Individualized Learning Plan for Characteristics of Dyslexia (ILP-D) District Oversight Plan

Tennessee Investment in Student Achievement

The following annotated sections from the [Chapter 0520-01-22 of the Tennessee State Board of Education Rules](#) support local education agencies (LEAs) in developing the required district oversight plans for Individualized Learning Plan for Characteristics of Dyslexia (ILP-Ds).

State Board of Education Rule 0520-01-22-.02(1)(d)(5) requires LEAs to:

> Adopt and implement an oversight plan that outlines the development, implementation, and monitoring of ILP-Ds for Students with Characteristics of Dyslexia in accordance with Tennessee Department of Education Rule 0520-12-05-.04 and the Tennessee Investment in Student Achievement (TISA) Guide. At a minimum, ILP-D oversight plans shall include procedures regarding [the following components].

(i) The development of ILP-Ds for all students with Characteristics of Dyslexia in the LEA or public charter school

Districts should address the following within their plans:

- Who is responsible for determining which students meet the criteria for an ILP-D (e.g., school-based data teams, interventionists)?
- How will LEAs ensure accurate identification of students who meet the criteria for ILP-Ds and timely writing of plans?
- Who is responsible for developing, implementing, and monitoring ILP-Ds? (See Section (vii) for more regarding the creation and implementation of plans.)

(ii) The monitoring of student progress on ILP-Ds quarterly

Districts should address the following within their plans:

- Who will be involved in the monitoring of ILP-Ds?
- Will monitoring of ILP-Ds be documented in TN PULSE through the Quarterly Progress Monitoring tile or another platform?
- If using TN PULSE for progress monitoring documentation, will other data be required to be uploaded and, if so, what?
- How will monitoring of the ILP-Ds be communicated between the interventionist and the general education teachers?
- How will progress monitoring be communicated to parents?

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(iii) Annual review and revision of ILP-Ds

Districts should address the following within their plans:

- When will the team responsible for ILP-Ds meet to review and revise ILP-Ds (e.g., within normal school-based data team meetings for students whose ILP-Ds are expiring; at specially scheduled meetings)?
- Will the ILP-D team meet in person or virtually?
- Is it acceptable for the person listed as "responsible" for the ILP-D to revise the ILP-D after team discussions held at another time?

(iv) Communication with parents and/or legal guardians and notification regarding ILP-Ds

Districts should address the following within their plans:

- How will the LEA determine parent communication preferences, including:
    - manner of communication,
    - technology access, and
    - language?
- Who will be responsible for generating in TN PULSE and sending parent notification letters when a child meets the criteria for an ILP-D?
- Who will be responsible for recording the parent's initial response within the TN PULSE system when a parent accepts or declines the ILP-D?
- How will parents otherwise be involved in the ILP-D process?
- How will districts ensure they are also still meeting parental communication requirements under the Tennessee Code Annotated § 49-1-905 (the Tennessee Literacy Success Act) and Tennessee Code Annotated § 49-1-229?
- How will districts communicate clearly to parents that an ILP-D is an intervention plan for reading and declining an ILP-D does not waive RTI^2 services?

(v) The special education referral process and how the LEA will ensure RTI^2 is not used to delay or deny special education evaluations

Districts should address the following within their plans:

- What is a summary of the special education referral process within the LEA?
- How is Child Find supported through the existing RTI^2 framework and tiered intervention support?
- How are parents being notified about the special education referral process, as required under State Board of Education Rule 0520-01-22-.02(1)(d)(4)?
- What communication processes are in place to effectively communicate the difference between an individualized education program (IEP) and an ILP-D, including a continuum of services and available accommodations (i.e., class versus testing accommodations)?

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(vi) The seamless coordination of services and supports for Students with Characteristics of Dyslexia who are also English Learners (ELs) and/or students with disabilities

Districts should address the following within their plans:

- How will districts rule out limited English proficiency as the ***primary*** cause of an EL student meeting the criteria for an ILP-D?
- How will districts further assess ELs, as needed, to determine reading deficits and the need for an ILP-D for those who meet the criteria?
- How will the LEA include all relevant stakeholders, including but not limited to RTI[2] teachers, ESL teachers, and special education teachers in the development and implementation?
- How will the interventionist, classroom teacher, and ESL teacher communicate and ensure coordinator of services and supports across plans?
- What is the LEA's procedure if a student needs wrap-around support? (Note: This is also an LEA procedure.)

(vii) Identification of school-based staff who are responsible for developing and implementing ILP-Ds

Districts should address the following within their plans:

- Who is responsible for developing and implementing ILP-Ds? If there are different teams/parties, what roles do they serve and why?
- What processes will be in place to ensure proper identification of qualifying students, progress monitoring, and review/revision of plans?

(viii) Training for appropriate staff regarding ILP-D requirements, development, and implementation

Districts should address the following within their plans:

- What training will be provided to staff to ensure a proper understanding of ILP-D requirements and best practices?
- How will training needs be determined throughout the year?
- Who within the LEA will be a touchpoint for questions from within the district on ILP-D requirements?

(ix) The sufficient staffing and resources required to support the development and implementation of all ILP-Ds across the LEA or public charter school

Districts should address the following within their plans:

- Who will ensure the oversight plan is followed (e.g., division of duties)?
- Who will be responsible for assigning permissions in the TN PULSE platform?
- Who will be responsible for record transfers and receiving records?
- Who will communicate with educators regarding the transfer of students?
- How will the LEA ensure that appropriate staff has access to data and information systems needed for the development, implementation, and monitoring of the ILP-D?

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Exit Criteria

State Board of Education Rule 0520-01-22-.01(5) requires ILP-Ds to include information about exit criteria. The department has recommended that a student may be exited from an ILP-D when the student has two consecutive universal reading screening data points that do not meet the criteria for the ILP-D. Districts may also define their own exit criteria based on student data. State Board of Education Rule 0520-01-22-.02(1)(f) states that Students with Characteristics of Dyslexia are not eligible to have an ILP-D if:

- The student's parent or legal guardian declines an ILP-D;
- The student with an ILP-D is subsequently determined eligible for special education and related services to support deficiencies in the area(s) of basic reading, reading fluency, or reading comprehension; or
- The student has a primary or secondary eligibility category on the student's finalized IEP to support deficiencies.

Districts should address the following within their plans:

- What are the LEAs standard exit criteria for ending a student's ILP-D? If different from the department recommendation, please detail our criteria and justification.
- How will LEAs track students with active ILP-Ds who are in the referral process to ensure students are exited from ILP-Ds if appropriate?
- What procedures will LEAs put in place for notifying parents who have previously declined an ILP-D that their student may still be eligible (such as on subsequent screening windows)?
- How will these exit criteria be communicated to all schools so that consistent practices are implemented across the LEA?
- Are there any student groups for whom exit criteria are unique? If so, explain.

Spelling

TISA includes encoding as a skill area that must be assessed where determined grade appropriate. The department, with the guidance of research and subject-matter experts, has included encoding as a necessary skill for screening in grades 1 through 12. The department has developed a state-provided encoding measure for grades 4 through 12. If districts choose to use an alternative skills-based encoding measure, it should be documented here. This measure should be as close as possible to a skills-based assessment that looks at grade-appropriate encoding skills based on the patterns of English orthography.

Districts should address the following within their plans:

- What is the district-selected encoding measure?
- Describe how it meets the criteria of assessing spelling at the skill level.
- What is the cut-off or risk indicator for a deficit? If the LEA created its risk criteria, please justify/support the decision.

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- How will the district communicate this plan to all schools so that there is normed, universal administration of the encoding assessment across the LEA?

NOTE: Once the department releases its 4 through 12 encoding measure, all LEAs not utilizing a skills-based encoding assessment will replace their 4 through 12 encoding measure with the department-provided measure for future screening windows.

Kindergarten

While protections against over-identification have been built into the URS Decision-Making Crosswalks, the department understands that a larger number of students may flag for the ILP-D criteria in the fall of kindergarten due to a variety of factors including but not limited to lack of exposure and school experience, unfamiliarity with assessments, and limited explicit instruction in foundational literacy skills.

Pursuant to the Tennessee Literacy Success Act and Tennessee Code Annotated § 49-1-229, LEAs are required to screen students three times per year in kindergarten, to identify students in need of further assessment, and to serve students with appropriate instructional supports. Such instructional supports could include but are not limited to Tier I small groups, opportunities for reteaching, tiered intervention, or tutoring. Districts may choose to not write ILP-Ds. However, LEAs may not delay screening or the provision of instructional support and may not use screening to delay or deny an evaluation for special education and related services. *See* U.S Dep't of Educ., [Memo to State Directors of Special Education](#) (Jan. 11, 2011).

LEAs may choose to create custom exit criteria for kindergarten students, or they may choose to have a separate process for when ILP-Ds will be written, such as in the winter and spring windows only. Any procedural practices that LEAs adopt should be universally applied across the districts. In other words, if LEAs are not writing ILP-Ds based on fall data, they should not be writing ILP-Ds for any students. Writing plans for only select students could lead to an inadvertent discrepancy in services, which could place districts in jeopardy of violating their obligations under federal or state special education or civil rights laws.

LEAs that serve kindergarten should outline their kindergarten procedures for ILP-Ds if they differ from other grades.

- When will ILP-Ds start being written for kindergarten?
- Does your district have set RTI[2] practices for kindergarten beginning with fall screening data?
- How will the LEA ensure that communication and practices are consistent and understood across all schools that serve kindergarten?

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