

THE RELATIONSHIP BETWEEN ADMINISTRATIVE
KNOWLEDGE OF REGULATIONS, LOCAL CONSTRAINTS,
AND THE DEGREE OF COMPLIANCE WITH
REGULATIONS OF SPECIAL EDUCATION IN
SELECTED LOCAL EDUCATION AGENCIES

by

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(ABSTRACT)

Principals have performed many tasks which either promoted or hindered facilitation of the learning process for all students in their schools. One of these tasks has been compliance with federal and state legislative procedural requirements for special education. Though there has been relative progress in special education, compliance has not been 100% in program visits performed by State Department of Public Instruction. The purposes of the study were to: (a) determine the relationship between the level of administrative knowledge of compliance requirements with the degree of application of legislative regulations of special education (b) identify the constraints or factors which prevented total compliance in a local education agency.

A two-part study was designed to fulfill the researcher's purposes. The initial phase of the study consisted of an opinionnaire to determine the amount and source of administrative knowledge of state and federal procedural legislative requirements. The second phase of the study involved individual interviews to

identify the constraints to compliance with special education legislative requirements.

Major conclusions were (a) knowledge did not make a difference in the school system's compliance with state and federal procedural legislative requirements (b) there were numerous constraints six of which permeated the study as knowledge understanding of regulations, excessive paperwork, money, time, parent/community awareness and maintenance of records (c) local educational agencies who were in 100% compliance did not differ significantly from schools who did not comply in the identification of factors which prevent compliance with state and federal legislative procedural requirements.

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Chapter I

INTRODUCTION

Principals have performed many tasks which either promoted or hindered facilitation of the learning process for all students in their schools. One of these tasks has been compliance with federal and state legislative procedural requirements for special education. Compliance is defined as the "act or trait of submitting to the wishes, requests, or dictates of another person or of a group" (Good, 1973 p. 122). More specifically, it is "behavior exhibited by an employee which suggests that he/she is basically committed to the goals of the organization and is contributing to the goals of the organization and is contributing to their realization" (Dejnozka, 1983 p. 34).

Compliance strategies have been devised through federal legislation and policies developed by the Department of Education to implement that legislation. All of these policies have stressed the need for leadership for proper compliance.

As administrative and instructional leader of the school, the principal is considered to be critical in effecting compliance with special education legislation within the Local Education Agency. Kauffman and Hallahan, (1981) indicated that of all organizations dealing with delivery of special education services, the local education agency possessed the most significant possibility of "complexity." The "complexity" could be explained

through the corporate responsibility of principals as being essential in the LEA. Hanson (1975) conceded that the building administrator:

. . . more than ever is caught between two colliding systems of control. He (she) faces a superordinate structure (superintendent, school board, state legislature), which expects him or her to execute the formally established policies for the school. The principal also faces the teachers who are gaining and exercising the right in determining the rules and regulations which he (she) is expected to administer. He (she) also sees their gaining and exercising the right to monitor and expose his or her administrative performance while the principal's right to monitor their performance threatens to evaporate (pp. 21-26).

Lietz and Towle (1980) discussed the importance of the school administrator being knowledgeable about federal and state requirements concerning special education in order to be effective in administering a special education program. Further, they stated that the school administrator should establish acceptable expectations of the school staff in implementing the requirements of the law. Stoops, Rafferty and Johnson (1975) indicated for a principal to be fully prepared for special education programs . . .

"a broad knowledge and understanding of the principles of child growth and development are essential, as well as full knowledge of the laws concerning special education." Cline (1981) in a study on principals' attitudes and knowledge about handicapped children found that principals with less than ten years of experience were more knowledgeable about placement procedures than those with more experience. Cline, in his conclusion, affirmed the lack of knowledge of principals pertaining to the handicapped. He stated that there should be emphasis on the education of principals because they serve as the "school's gatekeeper." Because of this role, the principal is the key person in the local education agency to determine placement of students in various programs. The principal is the administrative and instructional leader with responsibility of supervision for all programs including special programs at the building level. "Attitudes (of the principal) toward programs for the handicapped may be emulated by teachers" (Shockley, 1980 p. 16).

Inasmuch as principals are characterized as organizers and managers of their school's special education programs, they can affect the degree of compliance with special education legislation (Mayer, 1982). Numerous factors impinge upon the principals' organizational knowledge and decision making, including their own attitudes toward special education as well as policies of the board, directives of the superintendent, and skills of the special

education administrator. Inhibiting factors or constraints are evident through a review of program compliance visits of LEAs in 1983-84 and 1984-85 which revealed non-compliance issues. Table 1 indicates those areas that were not in compliance. The non-compliance areas included referral process, evaluation procedures, placement, Individualized Education Program for the handicapped, Group Education Program for the Academically Gifted, educational programs for the pregnant, pupil-teacher ratio and due process procedures. Though there has been relative progress in some areas, there has only been a degree of compliance. Compliance has not been 100% in all program visits. For example, in North Carolina during the 1984-85 school year, only 12% of the 32 LEAs who had program compliance visits were in 100% compliance with state and federal procedural requirements. "School districts . . . have no option but to move forward in compliance with the Education for All Handicapped Children Act" (Nevin, 1977, p. 19).

According to Nevin (1977) the "effective implementation of any law depends on both knowledge about the substantive issues involved in the law as well as the skills and performances associated with establishing appropriate processes and administrative procedures" (p. 19). The principal's knowledge therefore has become critically important. The principal's knowledge can contribute to the degree of effective compliance (Mayer, 1982).

Listed in Table 1 are the issues and the percent of LEAs that were cited in non-compliance during 1983-84 and 1984-85. During 1983-84, 24 LEAs were monitored and 32 LEAs were monitored during 1984-85.

Table 1

Non-Compliance Issues Cited in Monitoring Visits
1983-84 and 1984-85

<u>Non-Compliance Issues</u>	<u>% of LEAs 1983-84</u>	<u>% of LEAs 1984-85</u>
Referral Process	46	22
Evaluation Procedures		
*Comprehensive Evaluation	33	66
Special Identification	75	72
Required Screening and Evaluation	83	78
*Post-Evaluation	66	78
*Re-evaluation	46	56
Placement		
*School-Based Committee	71	78
Administrative Placement Committee	58	25
IEP for the Handicapped, GEP for the Academically Gifted, and Educational Programs for the Pregnant		
IEP development and implementations	17	12
Required persons develop and write IEP	87	28
*IEP components	54	59
*Parent participation in IEP writing	46	47

Table 1 continued

<u>Non-Compliance Issues</u>	<u>% of LEAs 1983-84</u>	<u>% of LEAs 1984-85</u>
*GEPs are developed and implemented	4	9
*GEPs are used for a group of two or more academically gifted students	4	16
Pupil-Teacher Ratio		
Academically Gifted	12	6
*Educable Mentally Handicapped	8	19
Specific Learning Disabled	33	6
Due Process Procedures		
Independent Educational Evaluation	12	6
Prior Notice: Written Consent	58	34
*Content of Notice	42	59
*The notice must be . . .	4	6
Surrogate Parents	4	3

*Issues that yielded a higher percentage of non-compliance issues in 1984-85 than 1983-84.

Source: North Carolina State Department of Public Instruction

STATEMENT OF THE PROBLEM

What is the relationship between the level of administrator's knowledge of compliance requirements with the degree of application of legislative regulations of special education?

Evolving from this question, the study addressed the following sub-questions:

1. What knowledge exists among principals concerning federal and state procedural legislative requirements?
2. What relationship exists between the knowledge of the director/supervisor of special education and knowledge of principals?
3. What is the principal's source of knowledge concerning compliance with federal and state procedural legislative requirements?
4. What are identifiable constraints which hinder or prevent compliance?
5. Is there a discernable pattern (or profile) of constraining factors that exist that characterize Local Education Agencies who do not comply with legislative procedural requirements?
6. Is there a difference between constraints of elementary and secondary principals with the degree of compliance with legislative procedural requirements?

PURPOSE OF THE STUDY

It was the purpose of the study to determine the amount of administrators' knowledge of compliance with the degree of application of legislative regulations of special education. The study further considered factors that prevent total compliance in a local education agency.

SIGNIFICANCE OF THE STUDY

Through utilization of the data gathered and analyzed in this research, a greater understanding of local constraints to total compliance and the principal's level of knowledge with their relationship to procedural compliance with special education legislation will be revealed. This information will supply the local education agency and State Department of Public Instruction with information that would be useful when planning staff development activities with principals. Activities may include types of constraints that reduce compliance with a thought to providing assistance to overcome recognized constraints. Subsequent inservices can also be developed.

LIMITATIONS OF THE STUDY

The study will be restricted to local education agencies from the state of North Carolina. These LEAs participated in program compliance visits conducted by the State Department of Public Instruction during the school year of 1984-85. Selected LEAs were part of a second cycle of program compliance visits within a five

year cycle of visitations of all LEAs from eight educational regions. North Carolina has a total of 142 LEAs.

The study and its related findings apply only to the subjects in local educational agencies participating in the investigation. Since the investigation was limited to twelve LEAs, the results of the study cannot be generalized to the entire state.

Data for the study came from principals and special education directors/supervisors in the LEAs. The principals' reactions to the results of their compliance visits will further limit the study, since those surveyed may have taken the initiative to correct their level of knowledge.

DEFINITIONS OF KEY TERMS

For the purpose of this study, the following key terms will be defined:

1. Compliance. The degree to which LEAs meet certain federal and state procedural guidelines. The degree of compliance is measured by a review.
2. Constraints. Factors that inhibit accomplishment or fulfillment of procedures.
3. Program Evaluation. Involves gathering data describing programs, keeping records, improving programs, ensuring accountability, reporting and decision making.
4. Program Compliance Visit (PCV). Full on site visitation of exceptional children's programs in the public schools to monitor programs for handicapped and gifted children for compliance with

P.L. 94-142 and Rules Governing Programs and Services for Children With Special Needs.

5. Elementary Principal. The chief administrator and instructional leader of a local school building with a student range of grade levels K-6.

6. Secondary Principal. The chief administrator and instructional leader of a local school building with a student range of grade levels 7-12.

7. Director/Supervisor of Special Education. The Central Office person designated the responsibility for the administration of the special education program for the local education agency.

8. Local Education Agency (LEA). The school corporation providing free public special education and related services to children on a local or cooperative basis and under the rules and regulations of the State Education Agency. (A Desk Reference Manual for School Principals on Special Education, p. 66).

9. State Education Agency (SEA). The state education agency is the North Carolina Department of Public Instruction.

10. Special Education. Specifically designed instruction, including necessary related services, to meet the unique needs of a handicapped student, including classroom instruction, instruction in physical education, home instruction in hospitals and institutions.

ORGANIZATION OF THE STUDY

Chapter I established the problem, stated the purposes and significance of the study, defined key terms and limitations and described the organization. Chapter II will consist of a review of literature on compliance with special education legislation, a perspective on constraints to compliance with special education legislation, the roles of the principal and special education director/supervisor in special education compliance. Chapter III will encompass the methodology, the type of research, the population to be surveyed, the instrument to be used, the method of collection and treatment of the data. Chapter IV will present the findings based on data gathered, give an analysis of the data and conclusions. Chapter V will discuss the results, summarize, give conclusions and recommendations for further research.

Chapter II

REVIEW OF THE LITERATURE

Introduction

The review of literature focuses on three major areas of research pertinent to the study: (a) an overview of compliance regulations and constraints to compliance; (b) the role of the principal in the administration of special education; (c) the role of special education director/supervisor in the administration of special education. No previous study has dealt with the topic under investigation even though the knowledge level of certain categories of special education has been explored.

AN OVERVIEW OF COMPLIANCE REGULATIONS

AND CONSTRAINTS TO COMPLIANCE

Compliance is the degree to which LEAs meet certain federal and state procedural guidelines as measured by a professional review. Mayer (1982) alluded to compliance as an accountability issue citing a statement from Plutarch: (Ulich, 1948, p. 6)

Fathers, themselves, ought every few days to test their children, and not rest their hopes on the disposition of a hired teacher; for even those persons will devote more attention to the children if they knew they must from time to time render an account.

Mayer contended that special education compliance reviews

were one measure of accountability. Public Law 94-142 requires that state education agencies demonstrate that their state is in compliance with the law. As a result, state education agencies (SEAs) evaluate and monitor local education agencies (LEAs) by means of on site visits by state officials who utilize checklists designed to measure degree of compliance.

Public Law 94-142 was the culmination of a long line of legislation affecting the handicapped in our nation. Podemski and others (1985) outlined the historical trend as indicated:

P.L. 85-926 passed in 1958, provided funds for the training of college instructors who would then instruct teachers of the mentally retarded.

P.L. 88-164 passed in 1963 . . . the act provided funding for the establishment of research and demonstration projects dealing with educating handicapped children.

P.L. 89-10 . . . Elementary and Secondary Act . . . primary focus on economically disadvantaged children; many programs for the handicapped children resulted from its passage.

P.L. 89-313 passed in 1965 to provide support for handicapped children in hospitals, institutions, and other state administered programs (Boston, 1977).

- P.L. 89-750 passed in 1966 . . . (1) created the Bureau of Education for the Handicapped, (2) provided for preschool programs for handicapped children.
- P.L. 90-480 passed in 1968 . . . elimination of architectural barriers to the physically handicapped.
- P.L. 90-538 called the Handicapped Children's Early Assistance Act. 1968.
- P.L. 91-230 passed in 1969 . . . (1) consolidated all existing legislation dealing with handicapped children, (2) recognized learning disabilities as a new handicapping condition, (3) included provisions for research, model programs, teacher training . . .
- P.L. 92-424 known as the Economic Opportunity Act Amendments of 1974 mandated . . . Head Start programs have 10 percent handicapped enrollments (Boston, 1977).
- P.L. 93-112. The Vocational Rehabilitation Act Amendments of 1973 included Section 504, which . . . states that handicapped persons should not be discriminated against because of their handicap in areas of employment, education, and accessibility to programs and services.

P.L. 93-380 passed in 1973 . . . addressed the following areas of compliance: (1) least restrictive environment, (2) due process procedures, (3) right to education for all handicapped children.

P.L. 94-142 . . . purpose . . . to ensure that every handicapped child receives a free, appropriate, education in the (1) least restrictive environment, (2) individual educational programs (IEPs), (3) the definition of handicapped, (4) non-discriminatory assessments, (5) parental involvement, (6) due process procedures, and (7) related services (pp. 5-7).

To highlight the importance of this mandate, Jones (1981) cited three special characteristics:

- (1) It is permanent legislation and does not require periodic reauthorization.
- (2) It is based primarily on existing state and federal statutes and case law.
- (3) It has a funding formula which permits every state, congressional district and school district to qualify for funds (p. 17).

Howe (1981) focused on these four major components of P.L. 94-142:

(1) least restrictive environment, (2) due process procedural safeguards, (3) protection in evaluation procedures and (4) individualized education programs.

The first one, least restrictive environment (LRE), requires that handicapped children be placed in educational environments that are appropriate to their individual needs; and that they be educated, to the greatest extent possible, with children who are not handicapped. The specific regulations of LRE in P.L. 94-142 (Code of Federal Regulations 1981) state:

(1) That to the maximum extent appropriate, handicapped children in public or private institutions or other care facilities, are educated with children who are not handicapped, and

(2) That special classes, separate schooling or other removal of handicapped children from the regular educational environment occurs only when the nature or severity of the handicap is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily

(p. 817).

The least restrictive provisions according to the 1985 Seventh Annual Report to Congress are basically adhered to and that states "have been actively engaged in the development of policies and procedures to ensure that handicapped children receive a free

appropriate public education in the least restrictive environment . . . as required by the act" (p. XIX).

Howe (1981) considers the due process hearing as the primary vehicle in P.L. 94-142 for resolving disputes between parents and schools concerning the education of handicapped children. Budoff and Orienstein (1982) in a study dealt extensively with the hearing and special education.

The third area of importance is protection in evaluation procedures. The regulations specify (Code of Federal Regulations 1981) that: state and local agencies shall insure, at a minimum, that the following measures be addressed:

(a) Tests and other evaluation materials:

- (1) are provided and administered in the child's native language or other mode of communication, unless it is clearly not feasible to do so;
- (2) have been validated for the specific purpose for which they are used; and
- (3) are administered by trained personnel in conformance with the instructions provided by their producer;

(b) Tests and other evaluation materials include those tailored to assess specific areas of educational need and not merely those which are designed to provide a single general intelligence quotient;

(c) Tests are selected and administered so as best to ensure that when a test is administered to a child with impaired sensory, manual, or speaking skills, the test results accurately reflect the child's aptitude or achievement level or whatever other factors the test purports to measure, rather than reflecting the child's impaired sensory, manual, or speaking skills (except where those skills are the factors which the test purports to measure);

(d) No single procedure is used as the sole criterion for determining an appropriate educational program for a child; and

(e) The evaluation is made by a multi-disciplinary team or group of persons, including at least one teacher or other specialist with knowledge in the area of suspected disability;

(f) The child is assessed in all areas related to the suspected disability, including, where appropriate, health, vision, hearing, social and emotional status, general intelligence, academic performance, communicative status, and motor abilities (p. 815).

The fourth component, Howe (1981) discusses, is that an individualized education program (IEP) is required for every handicapped child, prepared in writing according to state and

federal law. Public Law 94-142 specifies that to qualify for funds, an IEP must be written. Deno (1980) in a study deals with the substantive aspects of the IEP. The Code of Federal Regulations (1981) states that the content of the IEP must include:

- (a) A statement of the child's present levels of education performance;
- (b) A statement of annual goals, including short-term instructional objectives;
- (c) A statement of the specific special education and related services to be provided to the child, and the extent to which the child will be able to participate in regular educational programs;
- (d) The projected dates for initiation of services and the anticipated duration of the services; and
- (e) Appropriate objective criteria and evaluation procedures and schedules for determining, on at least an annual basis, whether the short-term instructional objectives are being achieved (p. 804).

The federal government offers money to states for special education under P.L. 94-142 the amount being determined by a December 1 count of handicapped children served. A state requesting the funds assures it will provide handicapped children with a "free appropriate education" in accordance with federal requirements. These requirements, which also apply to local

districts, cover the monitoring, evaluating and identifying of handicapped children as schools plan and carry out their education. Initially, New Mexico was the only state to opt out of seeking funds under P.L. 94-142 but it was still subject to Section 504 of the Rehabilitation Act of 1973. Section 504 of the Rehabilitation Act does not allow federal funds to any programs that discriminate against the handicapped. Subsequently in 1984, New Mexico applied for and received funding under P.L. 94-142.

Before the passage of P.L. 94-142 in 1975, 48 states had mandated special education for some or all of their handicapped children. State statutes and judicial decrees were the basis of the state mandates. Over half of the states had begun to mainstream students into the regular setting.

P.L. 94-142 was intended to assist the states in meeting financial obligations for the excess costs of providing special education. Educational standards under the Act became effective in 1978, requiring some states to make substantial revisions. Funding that was authorized began at a low level with increments, each year thereafter; however, congressional appropriations while gradually increasing, have not kept up with authorizations. Levine (1981) conceded that a commitment existed but the funds were not adequate to afford comprehensive services.

Earlier legislation, Section 504 of the Rehabilitation Act of 1973 (P.L. 93-112), had an important impact on special education.

This Act stated that federal funds were not to be provided to any program that allowed discrimination against handicapped persons. More importantly, Section 504 delineated standards similar to P.L. 94-142.

Bourexis (1978) explored policy implementation factors related to school compliance of P.L. 94-142 in Massachusetts. A field study was done on nine Boston public schools to determine the degree to which compliance was being met. Data were gathered through interviews and from other appropriate personnel involved in the implementation of P.L. 94-142. The following were delineated as factors pertaining to compliance:

- (1) goal consensus and role clarity by school personnel
- (2) sophistication of the school's organizational processes
- (3) ability of the school to communicate with other organizations
- (4) sufficiency of human, fiscal, physical, and material resources
- (5) amount of control over the implementation process
- (6) the level of commitment to compliance
- (7) the number of children who are referred and the ability to handle them
- (8) the amount of time the school has had to comply with the measure.

The study revealed that the primary obstacles to compliance were

lack of personnel, adequate materials and large caseloads.

How P.L. 94-142 and related laws are monitored is a major issue. The State Education Agency of North Carolina has given various divisions responsibilities for certain laws. The Division for Exceptional Children within the North Carolina State Department of Public Instruction is held accountable for the implementation of Public Law 94-142 and Public School Laws of North Carolina in the local education agencies. According to the Code of Federal Regulations 34, (1981) the mandate is:

300.601 Monitoring evaluation activities.

Each State educational agency shall:

- (a) Undertake monitoring and evaluation activities to insure compliance of all public agencies within the State with the requirements of Subparts C, D, and E.
- (b) Develop procedures (including specific timelines) for monitoring and evaluating public agencies involved in that education of handicapped children.

These procedures must include:

- (1) Collection of data and reports;
- (2) Conduct of on-site visits;
- (3) Audit of Federal fund utilization; and
- (4) Comparison of a sampling of individualized education programs with the programs actually provided.

The mandate from Public School Laws of North Carolina is stated thusly:

Article 45, 115-367, k

The department shall monitor the effectiveness of individualized education programs in meeting the educational needs of children with special needs.

The Rules Governing Programs and Services for Children With Special Needs as adopted by the State Board of Education in May, 1980 stipulated that:

Local school administrative units reporting headcounts above the expectancy norms will be audited. The Board may authorize within funds available additional allocations based upon audit recommendations.

Section .1536 of Rules mandate the following:

The State Board of Education will establish and operate an independent program audit function for exceptional children.

The Exceptional Childrens' Division has designed the Program Compliance Visit (PCV) to perform on-site visitations of exceptional children programs in the public schools, follow-up visitations to LEAs that have previously had full on-site visits and headcount audits. The objectives of a program compliance visit encompass items outlined:

- . monitor programs for handicapped and gifted children for compliance with P.L. 94-142 and Rules Governing Programs and Services for Children With Special Needs;
- . conduct headcount audit;
- . read LEA plans (Title VI-B, 89-313; EEOP, Early Childhood) on file in the Division office;
- . read LEA correspondence on file in the Division office to gain an overview of programs;
- . check Inquiry and Grievance System file;
- . conduct on-site visits to randomly-selected schools within randomly-selected LEAs;
- . compare random sample individualized education programs (IEPs) with actual classroom instruction;
- . review random sample student folders in confidential records;
- . interview the local director and small groups of parents, principals, regular class teachers, and special class teachers on local exceptional children procedures;
- . focus primarily on the areas of Child Find/Annual Census, Referral, Screening and Evaluation, Placement, Development and Implementation of Individualized Education Program (IEP), Least Restrictive Alternative, Pupil-Teacher Ratio, Procedural Safeguards and Due Process, Confidentiality and Access to Records, Qualifications and Certification of

- Educational Personnel, Comprehensive System of Personnel Development, and Building Facilities in examining exceptional children programs;
- . offer follow-up technical assistance from regional and Raleigh-based staff to local exceptional children programs;
 - . provide inservice opportunities for LEA local directors, principals, and teachers who serve as unit members;
 - . deliver the oral exit report of on-site findings to the LEA; and
 - . utilize the oral exit report as the basis for the final written report sent back to the LEA (From Director's Handbook, NCSDPI).

A review of the literature indicates limited studies in the area of compliance. Abbruzzese (1980), Ballard (1978), Jansma (1982), Beuks (1981) studied managerial aspects of compliance. Polifka's (1981) research dealt with compliance and consumer satisfaction. Sivage (1979) in a study ascertained the status of compliance in determining variables affecting a school system's level of compliance. Variables manifested were clarity of mainstreaming goals, staff knowledge of legislative requirements, communication between principals and special educators, principals' advocacy and leadership style, and school size. Weber and Rockoff

(1980) did a study on the relationship between demographic variables and compliance with P.L. 93-380 and P.L. 94-142.

Much progress has been made since November 29, 1975 when P.L. 94-142 was enacted but as indicated in the bi-weekly issue of Education of the Handicapped (1985) there are "flaws in the P.L. 94-142 monitoring system." This statement came as a result of South Carolina which was the first state to be fully monitored by federal officials. Both state and federal administrators concurred that paperwork was unwieldy. The compliance monitoring report generated 24,000 sheets of paper. President Gerald Ford anticipated such difficulties in compliance monitoring in the implementation of P.L. 94-142 as demonstrated in his presidential message in 1975:

"I have approved S. 6, 'The Education for All Handicapped Children Act of 1975.'

Unfortunately, this bill promises more than the Federal Government can deliver and its good intentions could be thwarted by the many unwise provisions it contains. Everyone can agree with the objective stated in the title of this bill -- educating all handicapped children in our nation. The key question is whether the bill will really accomplish that objective.

Even the strongest supporters of this measure know as well as I that they are falsely raising the

expectations of the groups affected by claiming authorization levels which are excessive and unrealistic.

Despite my strong support for full educational opportunities for our handicapped children, the funding levels proposed in this bill will simply not be possible if Federal expenditures are to be brought under control and a balanced budget achieved over the next few years.

There are other features in the bill which I believe to be objectionable, and which should be changed. It contains a vast array of detailed, complex and costly administrative requirements which would unnecessarily assert Federal control over traditional State and local government functions. It establishes complex requirements under which tax dollars would be used to support administrative paperwork and not educational programs. Unfortunately, these requirements will remain in effect even though the Congress appropriates far less than the amounts contemplated in S. 6.

Fortunately, since the provisions of the bill will not become fully effective until fiscal year 1978, there is time to revise the legislation and come up with a program that is effective and realistic. I will work with the Congress to use this time to design a program which will recognize the proper Federal role in helping

States and localities fulfill their responsibilities in educating handicapped children. The Administration will send amendments to the Congress that will accomplish this purpose." (Office of the White House Press Secretary, 1975)

Though the president had some reservations about P.L. 94-142, more students with special needs have received a free appropriate education. The gradual increase in the number of handicapped children served has been a trend since 1976-77. A growth of 632,486 children served occurred over the past eight years for a total of 4,341,399 handicapped children being served. (See Tables 2 and 3)

Table 2

Number of Children Aged 3-21 Years Served Under P.L. 94-142
and Aged 0-20 Years Served Under P.L. 89-313 from
School Year 1976-77 to 1983-84

School Year	Total Served	P.L. 94-142	P.L. 89-313
1976-77	3,708,913	3,485,088	223,825
1977-78	3,777,286	3,554,554	222,732
1978-79	3,919,073	3,693,593	225,480
1979-80	4,036,219	3,802,475	233,744
1980-81	4,177,689	3,933,981	243,708
1981-82	4,233,282	3,990,346	242,936
1982-83	4,298,327	4,052,595	245,732
1983-84	4,341,399	4,094,225	247,168

Source: "To Assure the Free Appropriate Public Education of All Handicapped Children" (Seventh Annual Report to Congress in the Implementation of the Handicapped Act: U.S. Department of Education - 1985)

Table 3
 Percentage of School Enrollment Served as Handicapped,
 by Handicapping Condition, during 1976-77,
 1982-83, and 1983-84 for the 50 States
 and the District of Columbia^{a/}

Handicapping Condition	1976-77	1982-83	1983-84
Learning disabled	1.79	4.40	4.57
Speech impaired	2.84	2.86	2.86
Mentally retarded	2.16	1.92	1.84
Emotionally disturbed	0.64	0.89	0.91
Other health impaired	0.32	0.13	0.13
Multi-handicapped ^{b/}	--	0.07	0.07
Hard of hearing/deaf	0.20	0.18	0.18
Orthopedically impaired	0.20	0.14	0.14
Visually handicapped	0.09	0.07	0.07
Deaf-blind ^{b/}	--	0.01	0.01
Total	8.33	10.76	10.89

^{a/} The percentages are based on school enrollment for preschool through twelfth grade children and handicapped enrollment for children aged 3 through 21.

^{b/} Data for these categories were not collected for 1976-77.

Source: Same as Table 2.

What constitutes constraints to compliance? Constraints refer to factors that inhibit accomplishment or fulfillment of a given piece of legislation as well as problems or difficulties encountered in meeting the demands of the law. Constraints are very much inherent in the organization of the schools. Among the reasons for these difficulties are the many legislative issues confronting the school community. P.L. 94-142 is just one of the major issues that have impacted the role of the schools. Schaffarzick and Sykes, eds. (1979) speak to six constraints to change the public school setting and thereby have implications to non-compliance of state and federal legislation: "non-decision making;" "zone of tolerance;" "vulnerability;" "conflict avoidance;" "non-instruction;" "politics of controversy" and "non-publication;" "non-implementation;" and "non-support." Burrello and Sage (1979) dealt with the driving forces in favor of change and restraining forces opposing change. The driving forces in Figure 1 included the general social climate, the courts and legislation. Restraining forces were ideological, bureaucratic and pragmatic factors.

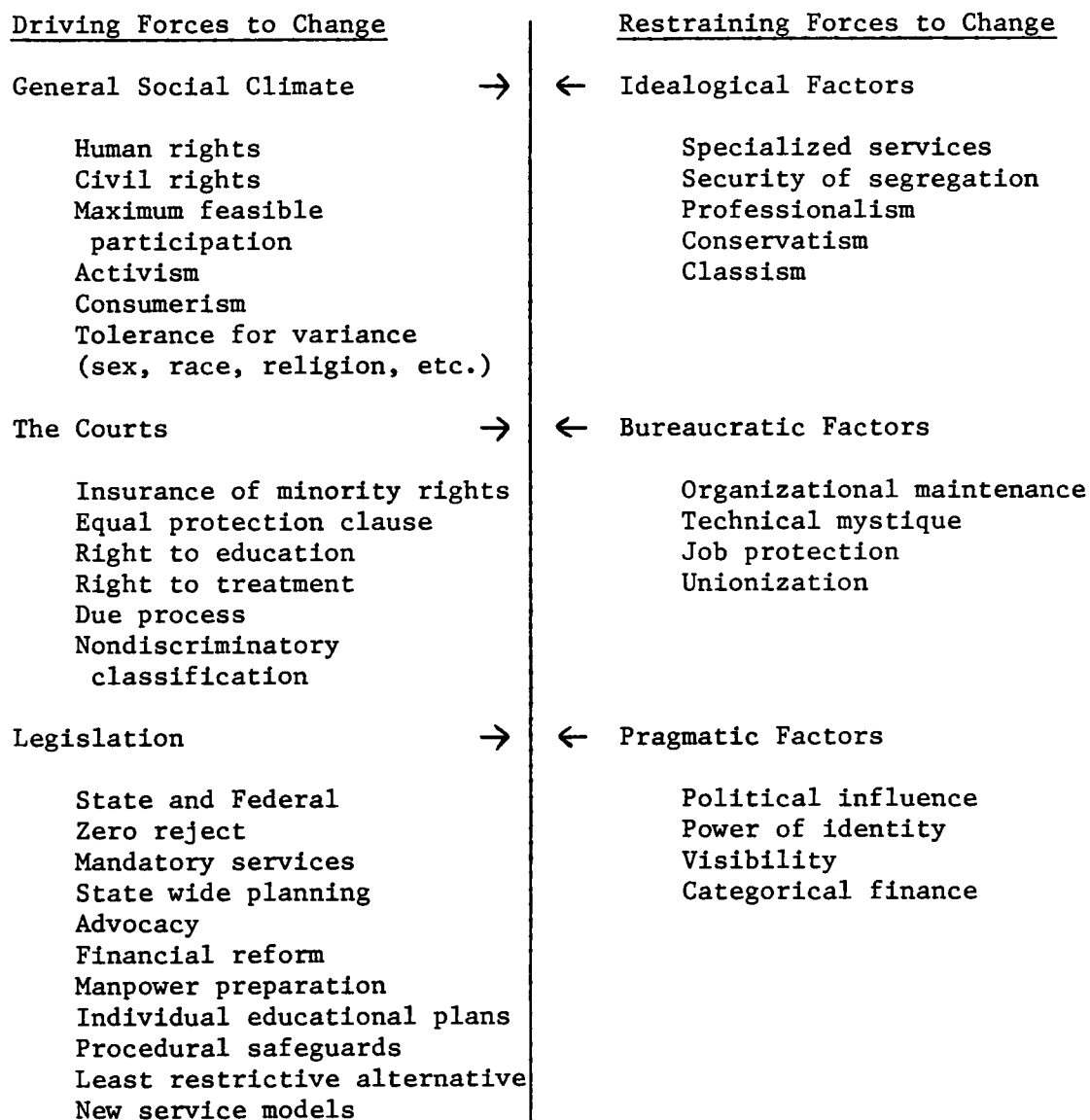
Welsch (1980) in his study concluded that time and inadequate space were also constraints. Welsch identified constraints at the high school level as personnel development and insufficient staff, whereas he identified these at the elementary level:

(1) dealing with the concerns of parents of "regular"

children that programs for their children be

Figure 1

Forces Influencing the Realization of Free,
Appropriate, Public Education for the Handicapped



L. C. Burrello, & D. D. Sage, Leadership and Change in Special Education (Englewood Cliffs, NJ: Prentice-Hall, Inc., 1979), p. 67. Reproduced by permission.

- equal in scope and support to those for special education students;
- (2) the development of new skills and knowledge in special education;
 - (3) developing understanding of the requirements of the law;
 - (4) the addition of new personnel and programs to supervise and monitor the special education program.

Christenson and Ysseldyke (1982) discussed in their study that institutional constraints are found in the referral process. Those identified were "organizational procedures, the teacher's perception of the competence of referral recipients, and availability of services." Drucker (1974) likewise cited various situations which would facilitate organizational effectiveness:

1. An organization's knowledge of mission, and the broadness of the mission.
2. The size of an organization, its structure, management style, and financial resources.

In summary, constraints to compliance as perceived by the literature are inherent within procedures developed as a result of the law, the organizational process and needed resources. Similarly, Etzioni (Sergiovani and Carver, 1980) stated in order for compliance to be achieved, three factors must exist, "the nature of the goals

to be achieved, the type of involvement one wishes from those who are to do the work, and the nature of the tasks which define this work."

ROLE OF THE PRINCIPAL IN THE ADMINISTRATION OF SPECIAL EDUCATION

Administrative leadership cited as a major characteristic of effective schools is centered in the principal who sets the tone and climate of the school. The principalship today is different and much more difficult than it was a half century ago. There is little resemblance between the duties, responsibilities, and problems of the principal of a few years ago and those of today's administrator. Vergason (1971) in his study suggested that accountability is necessary for the administrator (as well as the teacher) in the setting of tone and climate in which personnel can optimally work. Betz (1977) acknowledged with the escalation of handicapped services, the principal's role has become more visible. In a report entitled The School Principal: Recommendations for Effective Leadership, (1978) the principal's role was aptly summarized as taken from Toward Equal Educational Opportunity:

In many ways the school principal is the most important and influential individual in any school. He or she is the person responsible for all activities that occur in and around the school building. It is the principal's leadership that sets the tone of the school, the climate for learning, the level of professionalism and morale of teachers and the degree of concern for what students may or may not become. The principal is the main link between the community and the school and the way he or

she performs in the capacity largely determines the attitudes of parents and students about the school. If a school is a vibrant, innovative, child-centered place, if it has a reputation for excellence in teaching, if students are performing to the best of their ability, one can almost point to the principal's leadership as the key to success (p. 1).

Rutherford (1985) cites five characteristics of effective principals, namely "vision, translating the vision, a supportive environment, monitoring and intervening." As administrative and instructional leader of the school, the principal is critical in monitoring procedures required in special education legislation within the local education policy. Kauffman and Hallahan, (1981) indicate that of all organizations dealing with delivery of special education services, the local education agency possesses the most significant possibility of "complexity." The "complexity" could be explained through the corporate responsibility of principals as being essential in the LEA.

Shockley (1980) cites competencies inclusive of knowledge that a principal needs to implement P.L. 94-142:

1. Promotes and represents the developing trends and issues which affect their schools.
2. Fosters and engages in staff development programs which enable staff members to work collaboratively

and systematically in meeting the special needs of handicapped children.

3. Encourages and supports the development of appropriate and instructive learning environments for handicapped children.
4. Assists teachers in understanding a variety of assessment instruments and procedures.
5. Plans and implements new organizational structures which permit cooperative processes and relationships between the school, home and community, and the education department.
6. Manages the school plant and facilities, understands and communicates the architectural advantages and limitations of their buildings.
7. Understands personal attitudes as well as personal levels of strengths and limitations (p. 15).

Shockley (1980) explains the role of the principal in the function of staff development. This specificity may be construed as an expanded instructional position of the principal. Inservice is important if the barriers are going to be removed from regular and special education. P.L. 94-142 within its rules and regulations mandate comprehensive inservice.

Stoops, Rafferty, and Johnson (1975) indicate that "a broad knowledge and understanding of the principles of child growth and

development are essential, as well as a full knowledge of the laws concerning special education." Cline (1981) in a study on "principals' attitudes and knowledge about handicapped children" found that when compared with other experts in special education, principals demonstrated significantly less knowledge regarding placement and those with fewer than ten years experience are more knowledgeable than those with more experience. Cline in his conclusion of the study affirms the lack of knowledge of principals pertaining to the handicapped. He states that there should be emphasis on the education of the principal as the "school's gatekeeper."

Likewise Berman (1975) in discussing the principal as leader considered the principal as "gatekeeper of change." He corroborated the assumption that if you had to select one individual in the school district who counted the most it would be the principal. Nonetheless, Joiner and Sabatino (1981) in the conclusion of a study found that of all groups, general administrators with the role of setting the tone of the school were rated at the lowest level of consciousness "in regard to the policies" of P.L. 94-142.

Betz (1977) and Nevin (1977) in their studies dealt with the significance of "administrative competencies" in overseeing programs of special education. Jones (1981) claims "knowledge precedes acceptance and full implementation." Orr (1980) based on her study recommended that:

Public school administrators should assess the quality and quantity of available preservice and inservice programs designed to assist public school principals and teachers in the interpretation and implementation of Public Law 94-142 (p. 67).

Orr further concurs that the principals' maintaining knowledge is a necessity. Welsch (1980) in interviewing principals asserts that all of the elementary principals should have complete knowledge of federal, state and local laws, regulations and procedures in order to implement the law. The Junior High and Middle school principals acknowledged the need for knowledge but also indicated the principalship should:

1. Carefully monitor the special education program at the building level;
2. Hire competent personnel;
3. Philosophically support special education in front of the staff;
4. Work closely with all special education staff members;
5. Familiarize the regular staff periodically as to the requirements and mandates of P.L. 94-142 (p. 90).

Welsch further recommended that principals should be very knowledgeable of the P.L. 94-142 requirements. Bensky and others

(1980) acknowledged that adherence to P.L. 94-142 had caused stress for educators. Interpreted from this finding, the authors indicated need for staff development. The assumption made was "since lack of knowledge and related experiences surrounding P.L. 94-142 is one factor; intensive inservice was recommended." Lietz (1980) surmised that research is needed to determine if more knowledge would improve the effectiveness of principals at the building level.

Lietz (1980) itemizes the principal's special education functions as given by the National Association of Special Directors in Special Education.

1. Coordinate and administer special education services in the school;
2. Supervise educational personnel serving handicapped children in the school;
3. Designate and implement educational programs for handicapped children in the school, in accordance with approved policies, procedures, and guidelines of the LEA and of the State Department of Education;
4. Promote attitudes of school personnel and parents that encourage the acceptance and inclusion of handicapped children in regular classes and interaction with regular students;
5. Receive referrals of students with suspected

- handicapping conditions from teachers, parents, and others;
6. Arrange for appropriate evaluation for those students recommended for evaluation as a result of a screening procedure;
 7. Supervise the maintenance of child records at the school level and protect the confidentiality of these records;
 8. Receive teacher requests for assistance and provide or arrange for specialized assistance;
 9. Implement due process procedures;
 10. Plan for special education programs in the school and make budget recommendations to the superintendent;
 11. Participate in LEA plan for special education services (p. 108).

Robson (1981); Smith, Fleter, Sigelman (1979), Gearheart, Weishahn (1976), Meyen (1978), Weidholt, Hammill, Brown (1978); Nevin (1979) all concede to the importance of the principal's supportive role in special education. Lietz (1980) also concluded in his study that P.L. 94-142 "appears to increase the number of special education administration competencies required by general education administrators" (p. 93).

Orr (1980) in her findings suggested that university courses

be able to assist administrators in implementing P.L. 94-142.

Another finding was the need for staff development for principals in order to implement P.L. 94-142.

Podemski and others (1985) affirmed the significant impact of the principal's role in special education. "The school administrator, especially the building principal, is in a position to influence such change" (p. 1). In discussing the line of authority pertaining to special education administration, the special education supervisor/director was left out. The authors stated that many local education agencies do not have a supervisor or director. Even if there is a director or supervisor, this person does not have the "same level of authority, control, and decision-making responsibility as professional school administrators" (p. 2).

Podemski and others (1985) suggested the following recommendations for principals:

- . inform all personnel within the building of the status of special education and define their responsibilities with regard to the program;
- . involve special education personnel in the scheduling of students for class assignments, especially at the secondary level;
- . ensure that an honest effort is made to provide the special education teacher with sufficient materials;

- . recognize that many of the handicapped also have behavioral problems -- problems that should not negatively color the principal's attitude toward handicapped students or their teachers;
- . assume sufficient interest in the referral and assessment processes of special education to make cost-effective decisions concerning them;
- . seriously consider the evaluation criteria used to make judgments about program effectiveness and communicate such criteria to the special education teacher at the beginning of the program or at the beginning of the teacher's employment;
- . ensure, as educational leader of the school, that the goals and objectives of the special education curriculum are integrated with those of the regular curriculum;
- . assume an active role in supporting the special educator, a teacher who often suffers greater job stress than other teachers;
- . actively seek innovative inservice programs that will benefit the entire staff;
- . assist in communications with parents and special external personnel and agencies (p. 34).

In summary Gorton (1983) states that the administrator should

not only be knowledgeable concerning federal and state laws but have high expectations of staff in implementing the law. The administrator should also provide staff development and of primary significance "provide a model of behavior which indicates to all observers that the education of the handicapped in the least restrictive environment is an important and desirable educational priority, rather than an unnecessary legal mandate" (Rumble, 1979, p. 6).

Yules (1985) in the conclusion of her study indicated that:

"in order to increase the knowledge of those persons in administrative positions who are responsible for students with handicapping conditions, an infusion of special education administration courses needs to be incorporated into general education administration training" (p. 167).

Olsen (1982) in his study stated that "considerable room for growth in knowledge . . . toward P.L. 94-142 remains for the principal if he is to be an active leader for the handicapped at the building level" (p. 57).

THE ROLE OF THE SPECIAL EDUCATION ADMINISTRATOR

The special education administrator/director plays a pivotal role in a local school system in the administration of special education. In the Special Education Administrative Policies Manual, the Administrator of Special Education is "a person designated by the local education agency who has full or part-time responsibility for the planning, coordinating, budgeting, implementation and monitoring of all special education and related services provided to each exceptional child."

Betz (1977) in the conclusion of his study states that:

"the role relationship between the principal and the director . . . places the responsibility for the day-to-day operation of special education programming on the principal's shoulders. This may indicate that principals see a higher relevance for their administration of special education programs. It may, also indicate their understanding that all children in their building fall within their administrative jurisdiction" (p. 64).

He further contended that the principal is dependent on the special education administrator's expertise. Betz espoused the team concept of principal and special education administrator/director in order "to eliminate duplication of effort, facilitate communication flow . . . and improve the delivery of appropriate

educational services to handicapped children at the local building level."

Robson (1981) delineated differentiation of directors/administrators/supervisors of special education as opposed to principals. Special education administrators are responsible for . . . "consultative aspects . . . boundary spanning activities . . . maintenance of the special education organization . . . The principal has responsibility for direct services to pupils and in all supervisory and evaluation aspects of personnel administration" (p. 378).

The special education literature contains many references to the role and responsibilities of the special education administrator/director/supervisor. The most salient of these functions are:

To develop an appropriate special education for all exceptional children:

- establishes procedures for a system-wide census of all unserved and inadequately served exceptional children;

- develops a written handbook of procedures and policies;

- establishes procedures for placement, evaluation, assignment, and re-evaluation of students for exceptional children services program;

- surveys programs and analyzes data to facilitate the development of new programs and making needed changes in existing programs;

- evaluates on an ongoing basis, the total special education program, curriculum, procedures and individual student's needs and achievements;

establishes effective liaison and working relationships with the various offices and agencies (public and private) of the community, region and state which may provide specialized or professional help to the cultural arts program;

chairs administrative placement committee which assigns children to appropriate classes;

keeps informed of all federal and state laws, rules, regulations and policies pertaining to exceptional children;

plans and works cooperatively with all other central office staff who have an impact upon exceptional children's programs.

To perform the administrative duties necessary to enable exceptional children to utilize all educational opportunities:

recommends policies and programs essential to the needs of exceptional children and their parents;

assists principals with direction and coordination of classroom programs for all exceptional children;

provides leadership and direction to the Exceptional Children's Advisory Council;

assumes responsibility for compiling, maintaining and filing all reports, records, and other documents legally required or administratively useful;

supervises preparation of attendance reports and similar data necessary for reimbursement of funds, collecting of tuition for out-of-district students, and similar fiscal matters;

assists in recruitment, selection and recommendation for hiring of any exceptional children personnel;

assumes responsibility for the professional guidance and direction of and assists in the evaluation of personnel employed in the exceptional children area including teachers, supervisors and psychologists;

coordinates with director of transportation the transportation of all children placed in special classes;

develops budget recommendations and provides expenditure control on established budgets for special education;

keeps informed of the state of financial aide for special education;

maintains a permanent inventory of equipment purchased for special education;

approves all supplies, materials and texts used by exceptional children personnel if purchased through the central office.

To assist with the planning of and to participate in staff development activities relating to exceptional children and pupil personnel services which are designed to foster professional growth:

attends relevant professional meetings;

participates in developing inservice workshops.

To assist parent groups, community agencies, and individuals that have an interest in exceptional childrens' programs:

interprets the objectives and programs of the exceptional children services to the Board, the administration, the staff and the public at large;

provides requested information and when needed, a forum for interaction. (High Point City Schools Job Description Notebook)

Gearheart, Wright (1979) Baumgartner, Lynch (1967) Podemski,

Price, Smith, Marsh (1984) discussed the role of the special education director/supervisor in administering special education. A review of the literature also alludes to the importance of the special education director/supervisor working effectively with other support personnel. Begley (1982) in his study surveyed 124 special elementary administrators to determine burnout factors contributing to the administration of special education. The findings of the study included that individuals who had served as a supervisor/director for 7 to 10 years experienced the greatest feelings of emotional exhaustion and depersonalization.

Anastasio and Sage (1982) in a study on the role expectations for the director/supervisor of special education surveyed 247 special education directors, superintendents of schools, and principals with special education teachers. A questionnaire delineated 43 tasks of the perceived role of the special education director/supervisor. There was significant agreement among the three groups. Analysis of the data indicated that the facilitator aspect was emphasized even though it was low on the scale as perceived by the three groups. The aspect that was deemed most important was policy planning by directors and principals and legal rights by superintendents.

Whitworth and Hatley (1979) in their study determined the kind of training needed for special education directors/supervisors. Surveyed were 74 directors, superintendents, special and regular classroom teachers, and building principals. The results of the

study denoted that directors desired more training in student personnel services, guidance and counseling, and school community relations. In retrospect the director/supervisor has numerous roles but is best summarized by Baumgartner, Lynch (1967):

The supervisor's duties and responsibilities are varied. The underlying goals and objectives will be similar in the large, the middle-sized, and the small school system, but the manner in which those duties and responsibilities are implemented will be as different as the personalities of the different people involved (p. 75).

Summary

Both the principal and special education administrator have significant responsibility in determining total compliance within schools. However, in a study by Weber and Rockoff (1980), it was found that compliance was highly related to the number of years' experience of special educators. Polifka (1981), on the other hand, in his study of compliance and consumer satisfaction ascertained that parents felt procedures of legislative mandates were being followed. Smith and Tawney (1983) in "Compliance Monitoring: A Dead or Critical Issue" summarized the monitoring process as a means of enhancing opportunities for appropriate education for handicapped students.

For the LEA to be in compliance with the law, the principal

must have knowledge of the laws governing special education. In North Carolina these laws are found in the North Carolina Rules Governing Programs and Services for Children With Special Needs. A percentage of schools within each region of North Carolina has a program compliance visit each year. There appears to be a strong utilization of statistical data to measure compliance within a local educational agency. The review spells out 13 major areas from a fifty-eight page document: (Program Compliance Review Manual, 1984)

- 1.00 Child Identification and Location
- 2.00 Right to an Education
- 3.00 Referral
- 4.00 Evaluation
- 5.00 Placement
- 6.00 Individualized Education Program (IEP for the handicapped), Group Education Program (GEP) for the Academically Gifted, and Educational Programs for the Pregnant
- 7.00 Least Restrictive Alternative
- 8.00 Pupil Teacher Ratio
- 9.00 Due Process Procedures
- 10.00 Confidentiality and Access to Records
- 11.00 Qualifications and Certification of Education Personnel
- 12.00 Comprehensive System of Personnel Development (CSPD)
- 13.00 Building Facilities

Having knowledge of the rules and regulations of special education is one of the major changes in the principal's multifaceted role. Many forces have been applied to the schools. Hanson (1975) indicated that the building administrator:

. . . more than ever is caught between two colliding systems of control. He faces a superordinate structure (superintendent, school board, state legislature), which expects him or her to execute the formally established policies for the school. The principal also faces the teachers who are gaining and exercising the right in determining the rules and regulations which he is expected to administer. He also sees their gaining and exercising the right to monitor and expose his or her administrative performance while the principal's right to monitor their performance threatens to evaporate (pp. 21-26).

To facilitate the quality of compliance in North Carolina, two projects are currently being modeled in several districts. The projects are Triple P and Project APEX. The purpose of the Triple P program is to form a support network for principals who provide an appropriate educational program for students with special needs. The network provides principals with information regarding legal

aspects and regulations pertinent to special education, the classification of handicapping conditions, parent communication, community attitude and involvement toward special education.

Project APEX - Administrators Planning for Exceptionality - is a federally funded program designed to facilitate the education of exceptional students through professional development activities for local education agency superintendents and their appointed teams of administrators. The general purpose of the Project is to aid local administrators in their planning for exceptional students. Figure 2 delineates the goals and objectives and objectives for Project APEX.

Figure 2

Project APEX

Goals and Objectives

GOAL 1. To support the professional development of superintendents and board members in local education agencies for the accommodation of exceptional students in least restrictive learning environments, including the sharing of policy alternatives and the development or refinement of individual policy statements and plans of implementation.

Objective 1.1 To review and share ideas about alternative patterns of educational services for handicapped children and youth with LEA superintendents and one representative board member from each unit.

Objective 1.2 To share projections of future trends, from both national and state perspectives, for the education of exceptional children and youth.

Objective 1.3 To provide technical assistance to superintendents in the development and the refinement of their particular least restrictive environment policy statements and plans of action for implementation.

GOAL 2. To provide a reorientation in training for other educational leaders including central office personnel and principals, for whom specialized training is needed to plan staff development programs for

Figure 2 continued

classroom teachers and alternative strategies for appropriately serving the handicapped students in elementary and secondary classrooms.

Objective 2.1 To share ideas from exemplary exceptional child programs among local administrators.

Objective 2.2 To review and share ideas about alternative staff development programs with teams of central office administrators and building principals.

Objective 2.3 To provide technical assistance to school system teams of administrators as they work with others in their own systems to develop their particular plans and implementation strategies.

Objective 2.4 To help administrative teams refine staff development programs and plans of action for implementation.

GOAL 3. To provide superintendents and their administrative teams with the support requisite to implement new or revised policy statements and staff development programs to meet their needs for appropriate programming for the exceptional students in their school system.

Figure 2 continued

- Objective 3.1 To provide technical assistance to school officials in the identification of resources available to aid in the professional development of classroom teachers who serve handicapped students.
- Objective 3.2 To provide limited numbers of sets of materials to participating LEAs.
- Objective 3.3 To assist participating LEAs in implementing their plans of action.
- Objective 3.4 To evaluate this model of IHE-LEA networking to determine the implications for its future use.

Source: Project APEX, North Carolina State University
Raleigh, North Carolina

Project APEX lends itself to tightening up of staff development for principals. This staff development should lead to the enhancement of P.L. 94-142 and related laws as well as better quality programs.

The literature reviewed in Chapter 2 suggested a need for principals in local school districts to become more involved in the task of compliance with federal and state legislative procedural requirements for special education. The principal as educational leader, recognizing the exceptionality of every student in each individual building, must act as the advocate of the student and serve as a representative of the school system. According to Peterson, Albert, Foxworth, Tilly (1985), one future direction to assist the principal in advocacy is the Seattle School District which operationally defines strong leadership as the principal who is the instructional leader and dedicated to the fulfillment of the goals of the school utilizing all resources to accomplish goals.

In conclusion the principals' level of knowledge of compliance and the degree of application with regulations of special education can be summarized by Nevin (1977):

"It appears that general education administrators perceive that the degree of compliance with and the extent of commitment to the intent of the Education for All Handicapped Children Act of 1975 can only be demonstrated by each individual school district

and can only be as great as the competencies of the personnel involved" (p. 365).

Chapter III

METHODOLOGY AND PROCEDURES FOR RESEARCH

INTRODUCTION

In seeking to determine or isolate the factors that operate to obstruct local compliance, the descriptive tools of survey and interview were used. The study explored the local constraints and level of administrative knowledge of compliance. It attempted to establish a relationship between the level of administrative knowledge and the degree of application with regulations in special education.

THE POPULATION AND SAMPLE

The population surveyed in this study consisted of local education agencies located in the state of North Carolina that were part of the program compliance visits by the State Department of Public Education during the 1984-85 school year. There were 32 LEAs within the group that underwent review. These LEAs were a statewide subpopulation sample selected by the SEA without bias that met criteria for a program compliance review. The LEAs were a part of a five year cycle plan in which a compliance review process began in 1983-84. There are 142 LEAs in the state of North Carolina divided into eight educational regions. When beginning the five year cycle, there were fifteen to twenty-one LEAs per region. The Division of Exceptional Children with the North Carolina State Department of Public Instruction did not want any region to have more than five

LEAs monitored in a given year. During the first year, three LEAs were monitored in each region. The number was increased in subsequent years so as to complete all 142 LEAs within five years.

A representative sample of special education directors and principals was compiled to serve as the population under study. The purpose in studying the responses of this sample was to develop a data base reflective of the amount of knowledge special education directors and principals have in regard to compliance with federal and state procedural legislative requirements. This sample was drawn from administrators who participated in program compliance visits in 1984-85. Twelve LEAs were chosen because prior knowledge of four LEAs being in 100 percent compliance led to the stratification of the sample. The design of the study necessitated the comparison of LEAs that were in compliance and those that were not in compliance. Therefore those LEAs that were 100 percent in compliance were identified as one group termed as high compliance. Those LEAs that did not comply or had the most items out of compliance were further identified as the opposing group as low compliance. Four such LEAs were identified. In order to compare lack of compliance, a group of four LEAs with moderate percentage of compliance was identified. The precise measure of compliance for an LEA is "all or none." If one issue in a record is in non-compliance, then the entire record is in non-compliance.

Two hundred and twenty-six participants were identified from

the twelve LEAs. The population geographically represented eight county LEAs and four city LEAs. Pupils in membership being served by exceptional children programs ranged from 555 to 4,799. The entire school populations ranged from 2,734 to 23,030.

Since principals and special education directors/supervisors affect the degree of compliance at the individual level and local education agency, both were surveyed and a representative sample of principals and special education directors/supervisors were interviewed. A review of the literature emphasizes the need for school responsibilities of the principal and special education director/supervisor. These administrators can "pool their collective expertise to create opportunities for success, often playing roles that compliment or supplement one another's efforts" (Losen and Losen, 1985 p. 63). The results of the survey were used to contrast the relationship between the level of administrators' knowledge of compliance with the degree of application with regulations in special education. The amount of compliance is determined by the following:

1. A study of specific documents sent by the LEA for review prior to the site visit;
2. A comparison of services required to the services actually provided for randomly selected children;
3. A computerized check of staff certification;

4. Results of a director/supervisor questionnaire on the status of programming;
5. A site visit to the LEA for the purpose of interviewing Central Office Administrators; reviewing the folders of children randomly selected by the State Department of Education; interviewing parents or guardians of those children and visiting special education programs.

THE DATA

Data for the study were obtained through an opinionnaire and interview. Principals' responses to the opinionnaire were used to determine the following: (a) the amount of knowledge a principal has in regard to compliance with federal and state procedural legislative requirements; (b) whether a relationship exists between the knowledge of the director/supervisor of special education and knowledge of principals; (c) the principal's source of knowledge concerning compliance. Demographic information such as number of years as a principal or special education director/supervisor, total classroom teacher experience, continuing education in special education, whether the principal has tenure, and type of administrative unit provided identified concepts from the literature review as related to the degree of compliance with legislative requirements in a local education agency.

Responses to interview questions were used to (a) identify

constraints which hinder or prevent compliance; (b) determine whether a discernable pattern (or profile) of constraining factors exist that characterize local education agencies who do not comply with legislative procedural requirements and (c) whether there is a difference between constraints of elementary and secondary principals with the degree of compliance with legislative procedural requirements.

THE INSTRUMENT

The opinionnaire used in this research was based on a validated instrument constructed by Dr. Alice Stone, North Central Regional Consultant on Exceptional Children. The Stone opinionnaire (1983) was used to assess the knowledge and attitudes of principals and special education administrators in the North Central Educational Region of North Carolina State Department of Public Instruction.

To substantiate that the opinionnaire used in this study would measure the level of knowledge, the instrument was submitted to a panel for review. The panel included (a) an intern at Virginia Polytechnic Institute and University who was a former principal and special education director in North Carolina; (b) Special Education Director for the High Point Public Schools and (c) Special Education Coordinator of Guilford County Public Schools. Each person on the panel was asked to review the questions for clarity, conciseness and its ability to measure knowledge. Revisions, inclusions and omissions were made where necessary. Fifteen principals from the

High Point Public Schools were asked to complete the opinionnaire and determine the amount of time required to complete it.

To determine the source of the principals' knowledge of legislative regulations of special education, items were added to the opinionnaire. The items pertaining to source of knowledge were numbers 35 through 38. These items dealt with preservice training, inservice training, graduate courses and annual review of legislative requirements from North Carolina Rules Governing Programs and Services for Children With Special Needs. Demographic information pertaining to certification in Special Education and continuing units earned in special education were additional sources of knowledge. Item 39 was open-ended so as to obtain other ways knowledge was ascertained.

Interviews were used as a method of data collection to identify constraints to compliance in individual schools and the local education agency. The interview method also yielded supplementary data and explanations that were important to the understanding of the overall study. Eighteen principals and nine special education directors from the population in this study were interviewed.

The interview has had extensive treatment in the literature. Kerlinger (1973) saw the interview as one of the major methods of gaining information from people; however, on a pragmatic level, interviews take a lot of time. According to Kerlinger, "the interview is a face-to-face interpersonal role situation in which one person,

the interviewer, asks a person being interviewed, the respondent, questions designed to obtain answers pertinent to the research problem" (p. 481). Mouly (1978) added to that by stating

. . . the interview is a conversation carried out with the definite purpose of obtaining certain information and, if it is to yield dependable generalization, must subscribe to the same criteria as other scientific strategies (p. 201).

To decrease error and bias, probe questions can be used as "How do you mean?", "Can you tell me more about that?" or "Can you explain a little more fully what you mean about that?" (Moser and Kalton, 1972).

DATA GATHERING PROCEDURES

The opinionnaire was mailed to 214 principals and 12 special education directors from 12 LEAs who participated in the 1984-85 program compliance visits. The instrument was accompanied by a cover letter and sent with a self addressed envelope. Prior to sending the opinionnaire, superintendents were written a letter requesting support for the study. They were asked to encourage their principals to complete the instrument. Interviews were done both by telephone and personal contacts. Demographic data were taken from the 1984-85 North Carolina Education Directory.

DATA ANALYSIS

The data gathered from the revised Stone opinionnaire were reported in terms of one way ANOVA and Pearson Product Moment-Correlation. The data pertaining to amount of compliance were placed in three categories: high compliance, moderate compliance and low compliance. The one way ANOVA was employed to determine within group agreement of amount of knowledge for principals and directors/supervisors. The Pearson Product Moment-Correlation was used to determine the relationship between the knowledge of the director/supervisor of special education and knowledge of principals. The Statistical Package for the Social Sciences X was used to analyze the data from the opinionnaire.

The interviews were summarized using a descriptive analysis methodology. The content of the interviews was analyzed through the thematic analysis. Kerlinger (1973) states that the "theme is a useful though . . . difficult unit." He indicates that "a theme is often a sentence, a proposition about something" (p. 528).

The interviews were an integral part of this study. Structured and unstructured techniques were utilized to obtain specific information. Interviewees were all asked a series of predetermined questions for discussion as follows: (1) what are constraints which hindered or prevented you from compliance with federal and state regulations for special education? (2) identify indicators or evidence of support of special education programs in your local

education agency. (3) what makes compliance with federal and state regulations for special education difficult for you?

(4) what would make it easier for you to implement federal and state regulations? (5) how would you characterize local factors that inhibit your progress toward required compliance? (6) on a five point scale of 1-5 with "5" being the highest, how would you rate your superintendent's support of special education programs?

All principal interviews were conducted on site at respective schools or by telephone. Special Education Directors/Supervisors were interviewed at their central office or at the November 20-22, 1985 Council for Exceptional Children Conference held in Charlotte, North Carolina. With permission, interviews were tape recorded. Interrater reliability was used to determine correspondence on two randomly selected interviews.

Chapter IV

PRESENTATION AND ANALYSIS OF DATA

The purpose of this study was to determine the amount of administrators' knowledge of compliance with the degree of application of state and federal legislative regulations governing special education. These regulations include P.L. 94-142, Rules Governing Programs and Services for Children With Special Needs and Public School Laws of North Carolina.

North Carolina has had no other study based on specific data furnished by those responsible for implementing the P.L. 94-142 mandates. However Yules (1980), Betz (1977) and Lietz (1980) dealt generally with the importance of administrator knowledge. Yules identified and prioritized competencies necessary for secondary level administrators to supervise school-based special education programs. At the elementary school level, Betz dealt not only with the competencies principals needed, but also with the ideal relationship between the principal and the special education director/supervisor. Lietz suggested the profile of a model principal: an experienced, task-oriented administrator, with academic preparation in and commitment to the exceptional childrens' program.

The North Carolina Department of Public Instruction derived non-compliance issues as a result of its monitoring observations of selected LEAs during 1984-85 (Table 1, page 5). At this time, the reasons for non-compliance were not addressed.

The study utilized two forms of data gathering, an opinionnaire and individual interview. Data from the opinionnaire were analyzed for a total of 152 respondents of whom 140 were principals and 12 special education directors/supervisors representing 12 LEAs in North Carolina. Eighteen of these principals and nine special education directors/supervisors were interviewed. Data from the interviews were analyzed from the 27 respondents. Demographic information appears in the appendix.

In this chapter data based on the six research questions underlying this study have been tabulated and summarized. Each question will be reproduced, together with appropriate and pertinent data from the respondents.

Research Question 1. What knowledge exists among principals concerning federal and state procedural legislative requirements?

Principals' knowledge was assessed through correct responses to the first thirty-four items on the opinionnaire. Total correct responses for 140 principals ranged from 17 (50%) to 33 (97%) on the 34 item instrument. The overall mean correct response was 28 or 82.3%. The mean correct response for low compliance school systems was 24.2. For the moderate and high compliance school systems, the responses were 28 and 29 respectively. Table 4 shows the frequency of correct responses of principals by LEAs. There was a .5 difference in mean correct responses between low and high compliance. Table 5 gives a distribution of LEAs by mean correct responses of principals.

Table 4

Total frequency of correct responses of principals by compliance categories, of the knowledge of P.L. 94-142 and Rules for Governing Programs and Services for Children with Special Needs Instrument for 140 public elementary and secondary principals.

Low Compliance Scores (N=45)	Moderate Compliance Scores (N=75)		High Compliance Scores (N=20)	
	Frequency	Percent	Frequency	Percent
17	1	2.2	1	1.3
21	1	2.2	1	1.3
22	2	4.4	1	1.3
23	4	8.9	5	6.7
24	7	15.6	2	2.7
25	2	4.4	5	6.7
26	7	15.6	5	6.7
27	3	6.7	7	9.3
28	6	13.3	9	12.0
29	5	11.1	3	4.0
30	2	4.4	11	14.7
32	1	2.2	11	14.7
33	4	8.9	7	9.3
			5	6.7
			2	2.7
			17	21.3
			18	22.5
			20	25.0
			22	27.5
			23	28.8
			24	30.0
			25	31.3
			26	32.5
			27	33.8
			28	35.0
			29	36.3
			30	37.5
			31	38.8
			32	40.0
			33	41.3
			34	42.5
			35	43.8
			36	45.0
			37	46.3
			38	47.5
			39	48.8
			40	50.0
			41	51.3
			42	52.5
			43	53.8
			44	55.0
			45	56.3
			46	57.5
			47	58.8
			48	60.0
			49	61.3
			50	62.5
			51	63.8
			52	65.0
			53	66.3
			54	67.5
			55	68.8
			56	70.0
			57	71.3
			58	72.5
			59	73.8
			60	75.0
			61	76.3
			62	77.5
			63	78.8
			64	80.0
			65	81.3
			66	82.5
			67	83.8
			68	85.0
			69	86.3
			70	87.5
			71	88.8
			72	90.0
			73	91.3
			74	92.5
			75	93.8
			76	95.0
			77	96.3
			78	97.5
			79	98.8
			80	100.0

Table 5

Distribution of LEAs by Mean Correct Responses of Principals

<u>LEAs</u>	<u>Low</u>		<u>Moderate</u>		<u>High</u>	
	<u>Principals</u>	<u>LEAs</u>	<u>Principals</u>	<u>LEAs</u>	<u>Principals</u>	<u>Principals</u>
1	26	5	27	9	30	
2	27	6	28	10	29	
3	28	7	28	11	29	
4	26	8	28	12	27	

Research Question 2. What relationship exists between the knowledge of the director/supervisor of special education and knowledge of principals?

The Pearson product-moment correlation coefficient was employed to determine between group agreement of the knowledge of the director/supervisor of special education and knowledge of principals. The value of r for the two groups was 0.62.

Three separate one way ANOVAs were carried out to examine the knowledge means of the two populations according to low, moderate and high compliance. Tables 6 through 8 indicate these relationships. Table 6 is a summary of the administrative knowledge of respondents in the low compliance category. The means of the principals and the special education directors/supervisors in this category did not differ significantly. The value of the F ratio was .1785 which was not significant at $P < .05$.

Table 7 is a summary of administrative knowledge of respondents in the moderate compliance category. The means of the principals and special education directors/supervisors were slightly different. The value of the F ratio was 3.5524 while not significant did approach significance set at $P < .05$.

Table 8 is a summary of administrative knowledge of respondents in the high compliance category. The means of the principals and special education directors/supervisors were not significantly different. The value of the F ratio was .2421 which was not significant at $P < .05$.

Table 6
 Analysis of Variance of Knowledge of
 Principals and Special Education Directors/Supervisors
 in Low Compliance Category

<u>Source</u>	<u>D. F.</u>	<u>Sum of Square</u>	<u>Mean Square</u>	<u>F Ratio</u>	<u>F Prob.</u>
Between Groups	1	.0073	.0073	.1785	.6746
Within Groups	47	1.9111	.0407		
Total	48	1.9184			

<u>Respondents</u>	<u>N</u>	<u>Mean</u>	<u>Standard Deviation</u>	<u>Standard Error</u>
Principals	45	.0444	.2084	.0311
Special Education Directors/Supervisors	4	.0000	.0000	.0000
Total	49	.0408	.1999	.0286

Table 7
 Analysis of Variance of Knowledge of
 Principals and Special Education Directors/Supervisors
 in Moderate Compliance Category

<u>Source</u>	<u>D. F.</u>	<u>Sum of Square</u>	<u>Mean Square</u>	<u>F Ratio</u>	<u>F Prob.</u>
Between Groups	1	.1675	.1675	3.5524	.0632
Within Groups	77	3.6300	.0471		
Total	78	3.7975			

<u>Respondents</u>	<u>N</u>	<u>Mean</u>	<u>Standard Deviation</u>	<u>Standard Error</u>
Principals	75	.0400	.1973	.0228
Special Education Directors/Supervisors	4	.2500	.5000	.2500
Total	79	.0506	.2206	.0248

Table 8
 Analysis of Variance of Knowledge of
 Principals and Special Education Directors/Supervisors
 in the High Compliance Category

<u>Source</u>	<u>D. F.</u>	<u>Sum of Square</u>	<u>Mean Square</u>	<u>F Ratio</u>	<u>F Prob.</u>
Between Groups	1	.0100	.0100	.2421	.6274
Within Groups	22	.9400	.0413		
Total	23	.9500			

<u>Respondents</u>	<u>N</u>	<u>Mean</u>	<u>Standard Deviation</u>	<u>Standard Error</u>
Principals	20	.2236	.2236	.0500
Special Education Directors/Supervisors	4	.0000	.0000	.0000
Total	24	.0400	.2000	.0400

Since the research question #2 was stated so as to determine a relationship in the knowledge of principals and special education directors/supervisors, minimum and maximum correct responses were computed for each of the two groups by categories of low, moderate and high compliance. The number of items correct ranged from 17 to 33. Table 9 illustrates these data. The minimum correct response for principals in LEAs categorized as low and moderate compliance was 17; while the minimum correct response for principals in LEAs categorized as high compliance was 23. The minimum correct response for Special Education Directors/Supervisors was 26 for low and moderate while 27 in high compliance.

Table 10 gives a distribution of LEAs by mean correct response of principals as compared to the single score of directors/supervisors by LEAs. The mean correct response for principals was 28 while the mean correct response for special education directors/supervisors was 30.

Table 9

Distribution of Subjects by Level of Knowledge

	Respondents	Minimum Score	Maximum Score
High	Principals (N = 20)	23	33
	Special Education Directors/Supervisors (N = 4)	27	32
Moderate	Principals (N = 75)	17	33
	Special Education Directors/Supervisors (N = 4)	26	33
Low	Principals (N = 45)	17	33
	Special Education Directors/Supervisors (N = 4)	26	31

Table 10

Distribution of LEAs by Mean Correct Response of
Principals as Compared to Single Score of Directors/Supervisors

<u>LEAs</u>	<u>Principals</u>	<u>Special Education Directors/Supervisors</u>
1	26	30
2	27	29
3	28	31
4	26	26
5	27	33
6	28	26
7	28	32
8	28	30
9	30	32
10	29	31
11	29	27
12	27	31

Research Question 3. What is the principal's source of knowledge concerning compliance with federal and state procedural legislative requirements?

The principal's source of knowledge concerning compliance was determined by items 35-38 on the instrument. Table 11 illustrates the source of knowledge. Principals were asked to answer yes, no or undecided for various sources of knowledge available to them. These sources were: preservice training, inservice training, graduate courses taken since becoming a principal and annual review of the North Carolina Rules Governing Programs and Services for Children With Special Needs. The majority of principals, 120 (86%) obtained knowledge from the annual review of the North Carolina Rules Governing Programs and Services for Children With Special Needs. According to the Code of Federal Regulations (1981), each annual program plan must provide that the state educational agency insures that "ongoing inservice . . . programs . . . be available to all personnel engaged in the education of handicapped children . . ." (p. 808). Data indicate that 65% of principals have not had graduate courses in special education since becoming a principal. Principals (75.7%) also indicated that preservice training in special education was not a part of their college curriculum.

Principals were given an open ended question concerning source of knowledge. The question asked the principals to list additional sources of information pertaining to special education legislation.

Table 11

Knowledge Source of Special Education Legislation of Principals

<u>Type of Knowledge</u>	<u>No. of Responses</u>			<u>Mean</u>	<u>Standard Deviation</u>
	<u>Yes</u>	<u>No</u>	<u>Undecided</u>		
35. Preservice training in special education legislation was a part of your college curriculum.	22 (15.7%)	106 (75.7%)	12 (8.6%)	1.828	.379
36. Inservice training in special education legislation is part of your annual LEA staff development.	84 (60%)	41 (29.3%)	15 (10.7%)	1.328	.471
37. Graduate courses have been taken in special education legislation since becoming a principal.	36 (25.7%)	92 (65.7%)	12 (8.6%)	1.719	.451
38. The legislation requirements from the <u>North Carolina Rules Governing Programs and Services for Children With Special Needs</u> are reviewed annually.	120 (85.7%)	5 (3.6%)	15 (10.7%)	1.040	.197

Additional sources cited by the respondents included obtaining information from the Special Education Director/Supervisor, North Carolina Association for the Gifted and Talented, State Department of Public Instruction, Annual Council on Exceptional Children's Conference, Staff Newsletters, Association of Retarded Citizens, participation in Triple P and Project APEX.

Another open ended question was posed to each of the 140 principals and twelve directors/supervisors who participated in the study. The question was, "As a result of being notified by the State Department of your compliance status during 1984-85, did you take steps to learn more about the area of deficiency?" Twenty-seven respondents answered this question. One respondent cited that there was follow up by the Special Education Program director at each school. Other responses included the decision for all record keeping to be housed in one central place, an improvement of the access list to include all persons involved with records, an appointment of a team to review records, a review of legislative procedures and mandatory clean up sessions for reviewing exceptional children's folders.

Research Question 4. What are identifiable constraints which hinder or prevent compliance? For purposes of responding to research question 4, constraints of each respondent from interviews were examined. This ensuing section examines relevant data to correspond with research question 4.

LEA 1 - Secondary Principal. Respondent "A" indicated constraints to total compliance were the building structure itself and minor documentation of needed information for the maintenance of confidential records. According to the respondent the school building was erected in 1923 at which time special education was not a current nor a pressing issue with the schools. With increasing interest in accessibility of facilities, at this particular high school, many renovations in the physical structure have been completed. For example, ramps, walkways, and lavatory facilities have been designed for easy use by handicapped individuals. Cafeteria facilities have been made accessible to students in wheelchairs and also to those who require other equipment to assist them in walking, e.g. braces, canes, etc. However, the building was lacking an elevator. The building has four (4) floors including the basement. Travel to each floor is solely based on climbing stairs.

As to records, according to the respondent, the non-compliance issue encompassed documents which were not in place in the confidential folder for reason of misplacement due to excessive handling through the years, not required prior to 1977. The respondent surmised that the documents were "lost in transit." Overall, respondent listed eight constraints: building structure, minor documentation of needed information, centralized office for records, centralized staff for records, biased tests, awareness of handicap students' abilities, awareness of P.L. 94-142 demands and red tape of regulations.

LEA 1 - Elementary Principal. Respondent "B" indicated child

identification and location had been a constraint. The LEA had to return monies in 1984-85 due to improper identification. The respondent attributed this factor to administrators who were pressured by teachers who were incapable of handling students with disciplinary problems. Additionally this respondent indicated that the referral process was a constraint on the elementary level. It is difficult according to the respondent to determine if the child's deficiencies are due to environment, poverty, single parent homes or whether they are late bloomers. There is "hesitancy to test too early." Another constraint was paperwork within the referral process. From the time a child is referred, there is too much bureaucracy. In summary, respondent "B" listed six constraints: parents not agreeing, identification of handicapped and academically gifted students, referral process, evaluation process, IEP, and a need for money.

LEA 1 - Special Education Director. Respondent "C" cited five constraints: lack of sufficient time for teachers to complete required documentation, insufficient central office staff to monitor system documentation, a need to delete (sic) some uncooperative personnel, frequency with which regulations are changed and the variety of interpretations of regulations. Respondent "C" cited that consistent communications of interpretations would make it easier to be in compliance with federal and state regulations. The respondent also stated that there was a need to establish common interpretation among various persons who monitor programs.

LEA 3 - Secondary Principal. Respondent "D" indicated that confidentiality and access to records were constraints due to transition from one school to another school with no control of folders and transfers between other North Carolina administrative units. Further he contended that interpretation of rules is not always the same for program compliance visit personnel and that the continual changes in regulations were constraints. Respondent "D" cited seven constraints: transportation from one school to another, no control over folders, records transferred from other LEAs, specificity of the regulations, changing rules once you learn them, absence of indepth understanding of regulations and persons responsible for compliance viewing procedures as hindering instruction.

LEA 3 - Elementary Principal. Respondent "E" cited parents' unwillingness to permit students to be tested as a constraint. He felt that this prevented needed services for students. Because of the extreme rural setting the principal alluded that for students to be placed in special classes was degrading from the parents' vantage point. Respondent "E" indicated three constraints: parents unwilling to receive services, a need to acquaint general public with special needs, and a need to educate the community.

LEA 3 - Special Education Director. Respondent "F" indicated that money was a constraint. He also denoted that the state funding formula was an inhibiting factor. The emphasis on paperwork was also cited as a constraint. In summary, respondent "F" listed five constraints:

very poor county, funding formula, public education, unusual expectations, and paperwork.

LEA 4 - Secondary Principal. Respondent "G" indicated that the system had been sued several times in regard to appropriate program/placement. He discussed this aspect in reference to the issue of related services. "Parents expect more than what is required." As an example three aides had to be hired to work with three individual students. All are quadraplegic. One child weighing 200 pounds has to be lifted. The respondent also specified that having non-certified special education teachers was a constraint. Money was also cited as a constraint. Further he denoted the absence of a complete indepth understanding of regulations-procedures which involved forms, meetings and school-based activities. "The changes in Administrative Placement Committee including the new Teacher Assistance Team and also having to manage multi-disciplinary committees are 'mind boggling'. People who are responsible for compliance monitoring are trained as educators and view regulations as being in the way of instruction." Respondent "G" cited ten constraints: sued several times, parents expect more than required, local groups pushing special education, money for special aides, unusual needs of special students, IEP's when students are mainstreamed, teachers not always certified, too much regulation and red tape and lack of consistency with regulations.

LEA 4 - Elementary Principal. Respondent "H" indicated money as the "biggest" constraint. He also discussed bureaucratic maze of

paperwork as hindering total compliance. He felt that the steps to be followed slowed down the referral process. Respondent "H" cited five constraints: money, changing criteria, paperwork, no counselors for emotional problems and too much stock in test results.

LEA 4 - Special Education Director. Respondent "I" identified negative attitudes toward special education, lack of adequate local money and lack of knowledge of regulations as constraints to compliance. She indicated that principals were too busy to participate in special education inservice. She further acknowledged that the Assistant Superintendent of Instruction had his own agenda for instruction and did not consider special education inservice as a priority. Respondent "I" cited twelve constraints: attitudes, LEA positions not always used for special education, other LEA personnel not being knowledgeable, too busy to inservice principals, assistant superintendent overlooks special education, only teachers and director knowledgeable, principals need to be more knowledgeable, need money for related services, need clerical assistance, staff development for administration and school board, and the need for advisory council.

LEA 5 - Secondary Principal. Respondent "J" indicated that the key area which prevents compliance was the attitude of the "folks who are supposed to be getting all of the paperwork done." She noted that senior high school teachers are "just keen on trying to tell you" about their expertise and are really not willing sometimes to put in the kind of extra effort and time that is necessary to make sure that

all procedures are followed. Respondent cited four constraints: attitudes of secondary teachers, money, space and attitudes.

LEA 5 - Elementary Principal. Respondent "K" concluded that time and paperwork made compliance with state and federal regulations difficult. "There are just too many papers to be filled out and have to be signed by too many people to get a child in a program." The respondent felt much of the bureaucracy in the referral process was redundant. Respondent "K" cited three constraints: time, paperwork, and the length of the process.

LEA 5 - Special Education Director. The evaluation process was considered to be the major constraint given by respondent "L". Compliance as far as timelines would probably be the thing at which we are lax and particularly in the area of evaluations." She further contended that even though the LEA had a number of psychologists, there is a consistent backlog of students who need to be evaluated. Paperwork was also discussed in terms of forms that are collapsed but then expanded with different interpretations of the law. Respondent "L" cited five constraints: timelines, need better procedures for hearing/vision tests in special education, paperwork, no time to see teachers and changes in guidelines.

LEA 6 - Secondary Principal. Respondent "M" listed parent cooperation and conformity of paperwork from county to county as major hindrances to compliance. Additionally he indicated inaccessible building facilities was a constraint. His high school was not

architecturally designed for the handicapped. Specifically he cited a case of a physically impaired student in need for specially designed bathroom facilities as a constraint. Paperwork was discussed also as a constraint in terms of new information not covered in inservice. Respondent "M" cited four constraints: parent cooperation, architectural barriers, no conformity of forms between LEAs and need for inservice on regulations.

LEA 6 - Elementary Principal. According to respondent "N", to his knowledge his school has not been out of compliance which was contrary to SDPI reports. Contacting parents was the major difficulty. He noted that many of the parents work or there were no home phones. He did assent that rigid timelines in the referral process create a morale problem in his school. Respondent "N" listed four constraints: contacting parents, paperwork, timelines and teacher morale.

LEA 6 - Special Education Director. Least restrictive environment characterizes a constraint spoken to by respondent "O". The respondent stated that a problem with compliance is "just trying to provide the very best services that you can knowing that you do not have strength in terms of assistance." She indicated that the county LEA is 40 miles long. She acknowledged that P.L. 94-142 speaks to providing an education for a child as close to the home school as possible. She indicated that they have children who ride the bus an hour or more because there are not services in that school. "We have 21 schools and in a county as long as ours it's hard to have services in all the

buildings." Paper monitoring was also cited as another difficulty in complying with regulations. Respondent "O" listed five constraints: problems with least restrictive environment, teacher inservice, size of county, paperwork and attitudes.

LEA 7 - Secondary Principal. Respondent "P" cited the following as constraints: backlog of re-evaluations, communication between regular and special education teachers, intervention strategies, time frame, TAT (Teacher Assistance Team) and paperwork. Communication between regular and special teachers had reference to interactions which amounted to "turfdom" on the part of the special teachers. Time frames within the referral process was also cited as a constraint.

LEA 7 - Elementary Principal. Respondent "Q" identified emergency placement as a constraint. The respondent indicated that the referral process does not provide for cases where a child needs to be placed when there is not time to proceed through all the steps of diagnostic and eligibility process. He also indicated that not having enough of the psychologist's time and not have elementary counselors were constraints. Respondent "Q" listed seven constraints: emergency placements, time, not enough psychologists, no elementary counselors, disciplinary procedures for exceptional children, sequence of steps in the procedures and money.

LEA 7 - Special Education Director. Respondent "R" categorized six areas of constraints: building facilities, money, caps on funding resources, time and paperwork. The area of building facilities was

cited due to the inability of students in wheelchairs having access to two story buildings. Finances were discussed in terms of the North Carolina funding formula. Paperwork was mentioned in reference to a comprehensive federal report that was required but information requested was not readily available. The law of P.L. 94-142 was delineated as a constraint. The respondent stated that the law is all encompassing. "More resources are needed. We can't have bleeding hearts writing the law and scrooges handing out the money for implementation." He also contended that "What President Ford said in 1975 is very true about the intent and provisions of the law." Further, he surmised that "We've created frustration on the part of many people."

LEA 9 - Secondary Principal. Respondent "S" expressed that what operates as a constraint has been the constant changes of "titles or identifications." As an example, he noted the change from "gifted and talented" to "academically gifted." Another constraint manifested was his limited experience in the LEA. Respondent "S" listed three constraints: changes in procedures, communication system and time.

LEA 9 - Elementary Principal. Respondent "T" attested to the referral process as a constraint. The difficulty according to the respondent was inherent in adhering to procedures in sequence with accompanying documentation. Paperwork was also important as a constraint. Respondent "T" cited four constraints: sequence of procedures, getting all documentation, getting parents' signatures and paperwork.

LEA 9 - Special Education Director. Finding personnel particularly in the area of speech was cited as a major constraint by respondent "U". State funding formula was also described as a constraint. What hinders compliance according to the respondent is North Carolina having caps on each category of exceptional children. "Children don't come in categories." Two constraints were cited: finding speech personnel and caps on funding.

LEA 11 - Secondary Principal. Respondent "V" spoke to "bureaucratic limitations" in dealing with compliance. The referral process as it relates to the high school level was interpreted. On the high school level many students may "fall through the cracks" because teachers may think the child has been or should have been identified. Respondent "V" cited four constraints: time, expertise, knowledge of referral system and knowledge of all regulations.

LEA 11 - Elementary Principal. Respondent "W" surmised that a constraint could be the lack of knowledge of the local director in disseminating appropriate information to the LEA. He also added a constraint could be persons responsible for compliance not interested in fulfilling obligations. Two constraints were indicated: lack of knowledge of director and lack of interest in fulfilling obligations.

LEA 11 - Special Education Director. Respondent "X" cited the least restrictive alternative as the most difficult based on the information available. This was delineated because of a mobile population in this LEA. Required paperwork was also cited as a

constraint in terms of the constant change of guidelines. Six constraints were delineated by respondent "X": least restrictive environment, getting records on group home students, timelines, paperwork, reliance on test scores and change.

LEA 12 - Secondary Principal. Respondent "Y" identified building facilities as a constraint. The principal reported that this barrier had been corrected with a cost of \$150,000. This endeavor was essential with four students in need of wheelchairs and two with braces or crutches. Respondent "Y" cited three constraints: building barriers, money and more teachers.

LEA 12 - Elementary Principal. Inability to reach parents in a timely fashion was a constraint as denoted by respondent "Z". This was illustrated by the respondent as parents neglecting to sign permission forms for any number of reasons such as child losing them or never bringing the form home. Parents failing to come in for individual conferences to review testing materials and coming to school-based committee meetings or administrative placement meetings were illustration of slowing down the placement process. Then according to the respondent time and paperwork were deterrents in the referral process. Respondent "Z" listed six constraints: inability to reach parents in timely fashion, student absences on test dates, parents not signing forms, parents not coming for conferences, time and too many rules.

LEA 12 - Special Education Director. Maintenance of records was

identified as a constraint. Respondent "ZZ" stated that "I think the people who are handling records, which in most cases are the teachers, are not totally convinced of the priority level." She cited another constraint was that of the principal not following all the regulations as being essential. The respondent summarized the overall process of adhering to regulations as difficult because there are "just so many details in every single step of the process." Upon reflecting on other aspects, she concluded:

Its also discouraging when you're trying to be in compliance with the law and the people with whom you are working, mainly the parents, act totally indifferent. You keep telling them they're right and you keep inviting them to meetings and they don't act like they care. That's not all of them but I would say at the secondary level that is probably the rule rather than the exception. They just don't come out. They just don't act like they care. If a parent comes along and sues us, that would be rare. Sometimes I wish they would sue us just because I want to see that they're interested and they know what's happening.

Respondent "ZZ" cited seven constraints: time, teachers' priority not records, principals' priority not records, consistency of understanding regulations, money, so many details in placement process and paperwork.

Permeating the content of the interviews was the concept that principals were aware of those facets of law that must be considered in order that the handicapped may be served, but equally aware of those constraints present which inhibit or prevent total compliance. Six major themes appeared to be associated with constraints as obstacles to compliance. Table 12 demonstrates constraints by LEAs and respondents.

Data analysis on constraints indicated that knowledge understanding of regulations and constant changes in these regulations was a prevailing theme. Fourteen (51.8%) respondents noted that interpretation and consistency of regulations were constraints. There were concerns such as more awareness of P.L. 94-142 demands, the enormity of red tape tied to regulations, the frequency with which regulations are changed and the variety of interpretations of regulations. There was also a concern for the need to have an indepth understanding of regulations through inservices. Overall, the responses alluded to the fact that a thorough knowledge of federal and state regulations was suggested for administrators.

A second theme, as determined by twelve (44.4%) respondents, was that of excessive paperwork. According to respondents, there was too much bureaucracy from the time a child is referred until the time services are rendered. Closely tied to this constraint was the process of identification, referrals, placement, IEP all of which were identified by respondents as constraints. Local educational agencies

Table 12

Summary of Constraints by LEAs

<p>LEA 1</p> <p><u>Secondary Principal-A</u></p> <ol style="list-style-type: none"> 1. Building structure - 4 floors 2. Minor documentation of needed information - some lost 3. Centralized office for records 4. Centralized staff for records 5. Biased tests 6. Awareness of P.L. demands 7. Awareness of handicapped abilities 8. Red tape of regulations 	<p><u>Elementary Principal-B</u></p> <ol style="list-style-type: none"> 1. Parents not agreeing 2. Identification of handicapped and gifted students 3. Referral process 4. Evaluation process 5. IEP 6. Need money 	<p><u>Special Education Director-C</u></p> <ol style="list-style-type: none"> 1. Lack of sufficient time for teachers to complete required documentation 2. Insufficient central office staff to monitor system documentation 3. Need to delete (SIC) some uncooperative personnel 4. Frequency with which regulations are changed 5. Variety of interpretations of regulations
<p>LEA 3</p> <p><u>Secondary Principal-D</u></p> <ol style="list-style-type: none"> 1. Transition from one school to another 2. No control over folders 3. Transfer from other LEAs - getting records 4. Specificity of the regulations 5. Changing rules once you learn them 6. Absence of indepth understanding of regulations 7. Persons responsible for compliance - viewing as getting in way of instruction 	<p><u>Elementary Principal-E</u></p> <ol style="list-style-type: none"> 1. Parents unwilling to receive services 2. Would help to acquaint general public of special needs 3. Educate community 	<p><u>Special Education Director-F</u></p> <ol style="list-style-type: none"> 1. Very poor county 2. Funding formula - money 3. Public education 4. Unusual expectations 5. Paperwork
<p>LEA 4</p> <p><u>Secondary Principal-G</u></p> <ol style="list-style-type: none"> 1. Sued several times 2. Parents expect more than required 3. Local groups push special education 4. Money for special aides 5. Unusual needs of special students 6. IEP - when mainstreamed 7. Teacher not always certified 8. Too regulated 9. Red tape 10. Need consistency with regulations 	<p><u>Elementary Principal-H</u></p> <ol style="list-style-type: none"> 1. Money 2. Changing criteria 3. Paperwork 4. No counselors for emotional problems 5. Too much stock in test results 	<p><u>Special Education Director-I</u></p> <ol style="list-style-type: none"> 1. Attitudes 2. No local money 3. LEA positions not always used 4. Other LEA personnel - not knowledgeable 5. Too busy to inservice principals 6. Assistant Supt. overlooks special education 7. Only teacher and director knowledgeable 8. Principals need knowledge 9. Need money for related services 10. Need clerical assistance 11. Staff development for administrators and school board 12. Need Advisory Council

Table 12 continued

<p>LEA 5 <u>Secondary Principal-J</u></p> <ol style="list-style-type: none"> 1. Attitudes of secondary teachers 2. Money 3. Space 4. General attitudes of the referral process and paperwork 	<p><u>Elementary Principal-K</u></p> <ol style="list-style-type: none"> 1. Time 2. Paperwork 3. Lengthy process 	<p><u>Special Education Director-L</u></p> <ol style="list-style-type: none"> 1. Timelines 2. Near/far vision - screening 3. Paperwork 4. No time to see teachers 5. Changes in guidelines
<p>LEA 6 <u>Secondary Principal-M</u></p> <ol style="list-style-type: none"> 1. Parent cooperation 2. Architectural barriers 3. Non-conformity of forms between LEAs 4. Need inservice on regulations 	<p><u>Elementary Principal-M</u></p> <ol style="list-style-type: none"> 1. Contacting parents 2. Paperwork 3. Timelines 4. Morale of teachers 	<p><u>Special Education Director-O</u></p> <ol style="list-style-type: none"> 1. Teacher inservice 2. Size of county 3. Paperwork 4. Attitudes 5. Least restrictive environment
<p>LEA 7 <u>Secondary Principal-P</u></p> <ol style="list-style-type: none"> 1. Backlog of re-evaluations 2. Communication with regular and special teachers 3. Intervention strategies 4. Time frame 5. TAT (Teacher Assistance Team) 6. Paperwork 	<p><u>Elementary Principal-Q</u></p> <ol style="list-style-type: none"> 1. Emergency placements 2. Time 3. Not enough psychologists 4. No elementary counselors 5. Disciplinary procedures for exceptional children 6. Sequence of steps 7. Money 	<p><u>Special Education Director-R</u></p> <ol style="list-style-type: none"> 1. Facilities 2. Money 3. Resources 4. Time 5. Caps on funding 6. Paperwork
<p>LEA 9 <u>Secondary Principal-S</u></p> <ol style="list-style-type: none"> 1. Changing identification procedures 2. Communication system 3. Time 	<p><u>Elementary Principal-T</u></p> <ol style="list-style-type: none"> 1. Sequence of procedures 2. Getting all documentation 3. Getting parents' signatures 4. Paperwork 	<p><u>Special Education Director-U</u></p> <ol style="list-style-type: none"> 1. Finding personnel 2. Caps on funding
<p>LEA 11 <u>Secondary Principal-V</u></p> <ol style="list-style-type: none"> 1. Time 2. Expertise 3. Knowledge of referral system 4. Knowledge of all regulations 	<p><u>Elementary Principal-W</u></p> <ol style="list-style-type: none"> 1. Lack of knowledge of director 2. Lack of interest in fulfilling obligations 	<p><u>Special Education Director-X</u></p> <ol style="list-style-type: none"> 1. Least restrictive environment 2. Getting records on group home students 3. Timelines 4. Paperwork 5. Reliance on test scores 6. Changes
<p>LEA 12 <u>Secondary Principal-Y</u></p> <ol style="list-style-type: none"> 1. Building barriers 2. Money 3. More teachers 	<p><u>Elementary Principal-Z</u></p> <ol style="list-style-type: none"> 1. Inability to reach parents in timely fashion 2. Student absences on test dates 3. Parents not signing forms 4. Parents not coming for conferences 5. Time 6. Too many rules 	<p><u>Special Education Director-ZZ</u></p> <ol style="list-style-type: none"> 1. Time 2. Teachers priority not records 3. Principals priority not records 4. Consistency of understanding 5. Money 6. So many details to placement process 7. Paperwork

are responsible for insuring that all children with special needs within their jurisdiction be identified, located and evaluated. The identification, screening, evaluation and placement are done at the individual school level. The process obviously entails paperwork at each stage.

A third constraint was money, cited by eleven (40.7%) respondents. In addition to the need of increased local funding, there were several responses pertaining to the caps on state funding and the need for a change in that funding formula at the state legislative level. The State Board of Education Controller's office calculated the allotment of state Exceptional Children's ADM Funds on a formula which is based on a headcount of handicapped and gifted students served by each local school system. The formula included a maximum number of students by category for whom funds were received. This funding cap on the various categories is based on national population incidence figures. The cap is a percentage of the school system's average daily membership and is as follows:

<u>Category</u>	<u>% (CAP)</u>
Emotionally Handicapped	2.60
Learning Disabled	3.90
Mentally Handicapped	3.00
Speech Impaired	4.55
Other Handicapped	2.20

One special education director/supervisor summarized caps as a

constraint in this manner: "we need a funding formula that is set up differently because children with special needs don't come in neat little packages." There was also apprehension on the part of two respondents on the possible cut of funds by 67% at the federal level.

Eleven respondents (40.7) cited time as a constraint. Time as a concept dealt with the length of the process and timelines of which various phases have to be completed. One principal indicated that the facet of timelines affected the morale of teachers in his building.

Six respondents (22.2%) respondents cited parent and community awareness as constraints. The participants rendered responses indicative of sufficient awareness of the need for parent input and cooperation. Respondents cited the problem of parents not agreeing with placement and difficulty in obtaining signatures to bring closure to the placement process. There was also the need to acquaint and educate the general public of special needs.

A final theme pertaining to records was cited by five (18.5) respondents. Confidentiality and access to records is only one aspect. Maintenance of records plays a significant role as to whether a school is in compliance upon being visited by a monitoring team. Closely associated with records were responses made pertaining to control over folders and their upkeep.

The underlying causes of constraints were ascertained through

the interview question "How would you characterize local factors that inhibit your progress toward compliance with federal and state regulations?" Respondents were asked to explain these inhibiting factors in terms of cultural, political, ideological or philosophical, bureaucratic, pragmatic and economic causes.

Three respondents indicated cultural factors as an underlying cause which may inhibit compliance. One respondent surmised that the current tests used to evaluate exceptional students are biased. Many of the students according to the respondent are exposed to many different cultural ideas, mainly those of the middle class standards. Many of the students in that particular school however are often deemed "retarded" because they do not give standard answers to requests.

Two respondents alluded to political causes. One respondent attested to the fact that he is not certain that legislators are perhaps aware of just how much it takes to provide special students with the education as outlined in P.L. 94-142. At times, he stated "I ponder if they have a realistic view of the educational demands which befall a system/district in truly providing an appropriate education." Another respondent indicated that politicians need to look at the law. "The law should reflect what we can do."

Ideological and philosophical factors were delineated by several respondents. One respondent stated:

Ideologically and philosophically, I feel that

people are not often aware that special students are capable of attaining an education. Often times students are short-changed because there are those who do not believe that they can learn unless they are geniuses.

A second respondent indicated that philosophically there were "loopholes in appropriate education." "What is meant by 'appropriate'?" He contends that we have stepped above the line and given the optimum."

Another respondent stated:

Probably the philosophical beliefs of folks who are in key leadership roles are a factor. If the belief is that youngsters who need to be served as other youngsters, we do everything in our power to see that these youngsters receive an outstanding and excellent education and all the benefits that accrue to them . . . If we who are in administration feel like these youngsters should be pushed off to the side and not given every opportunity, then that's what is going to happen.

The bureaucratic factor was cited most often as an inhibiting factor of compliance. One respondent expressed his concern in this manner:

Bureaucratically, I feel that we often impede a service that can be provided immediately . . . If it were not for the "red tape" that one must

endure for the sake of following regulations.

Another indicated that there was too much emphasis on bureaucracy rather than the quality of programs. Several described the bureaucracy in terms of too much paperwork, difficulties in adhering to timelines and documentation of each step taken in the referral process.

One respondent characterized the pragmatic factor with this statement:

Pragmatically speaking, it is my contention that the everyday means of educating students is not at all comparable. Each day we must evaluate our existing programs and make adjustments and explore new ways to help our students achieve the highest educational zenith they possibly can. Education and economics are issues to me which fall hand in hand. Without the economic support of the community and the administration a school district cannot survive nor can it provide the essential education which is so vital to all students.

Educational factors were described as the "lack of administrative knowledge," "education as a low priority of some parents," and "only handicapped parents seem to know about special education." One respondent alluded to the need of higher education to teach more

about the federal and state regulations which at this point she did not feel was covered enough at the undergraduate and graduate levels. The respondent stated "I think if people knew . . . the full ramifications of what P.L. 94-142 was before they entered the field, some people might not come into it."

The final area was the economic factor which was discussed in terms of not having adequate local funding. The state funding formula was also described as an economic factor.

To further develop underlying causes, respondents were asked to rate their superintendents on a scale of 1-5 with "5" being the highest. The overall mean rating was 4.4. The superintendent's support by LEAs were in moderate agreement. These were delineated as follows:

<u>LEAs</u>	<u>Rating</u>
1	4.5
3	5.0
4	4.7
5	4.3
6	3.0
7	4.0
9	4.3
11	5.0
12	5.0

Research Question 5. Is there a discernable pattern (or profile) of constraining factors that exist that characterize Local Education Agencies who do not comply with legislative procedural requirements?

Five of the nine respondents (55.6%) from LEAs categorized as low compliance indicated money as the major constraint. Examples of the comments are listed below:

"county area is very poor"

"not enough money in local budget"

"SEA position designated for special education are not always used on the LEA level"

"money is the biggest problem"

"additional funding for clerical assistance is needed"

"state funding formula is a problem"

Money was listed by three respondents out of the nine (33.3%), one of which related to the funding formula, from the LEAs categorized as high compliance. Two respondents out of nine (22.2%) from the category of moderate compliance cited money as a constraint. The aspect of money as it pertains to the state funding formula was a recurring issue. Child Identification and Location was listed by one respondent from the low compliance category. Confidentiality, documentation and access to records were classified as constraints by two respondents from low compliance. Other areas that characterized LEAs who did not comply were lack of related services and lack of cooperation of parents. Of the total one hundred

forty-three responses in the low compliance category, there were twelve responses (8.8%) pertaining to constraints in the area of knowledge of regulations cited as awareness of P.L. 94-142, "specificity of regulations," "changing rules once you learn them," "absence of indepth understanding of regulations," "other LEA personnel - not knowledgeable," "only teachers and director knowledgeable," "principals need knowledge," "changing criteria," "too regulated," "red tape," and "need consistency with regulations." There were two responses (1.5%) in the area from moderate compliance. Six responses (4.4%) were listed from the high compliance area. They were "knowledge of referral system," "knowledge of all regulations," "lack of knowledge of director," "consistency of understanding," and "too many rules." Overall sixty-one constraints (42.7%) from the low compliance category and forty-four constraints (30.8%) from the moderate compliance category and thirty-eight (26.5%) from the high compliance category were cited.

Research Question 6. Is there a difference between constraints of elementary and secondary principals with the degree of compliance with legislative procedural requirements?

Of five responses pertaining to parental cooperation as a constraint, four (80%) were on the elementary level while one (20%) of the responses was on the secondary level. Out of five responses listing building facilities as a constraint four (80%) were on the

secondary level while one (20%) was on the elementary level.

On the elementary level, the principals cited the referral process as a problem of which fifteen (42.9%) responses out of thirty-five were noted. Statements which categorized the process were: "identification of the handicapped and academically gifted," "paperwork," "time," "lengthy process," "emergency placements," "sequence of steps" and "getting all the documentation." One principal noted that parents do not always agree with psychological screening even though teachers feel the services are needed. One acknowledged that parents did not want their children labeled as special education students. Another stated "how do you tell a student one day he is different and the next day he is not based on the criteria involved." According to one principal, "timelines create morale problems." Keeping steps in sequential order was clarified by one principal in this manner: "procedures in the sequence that they should be followed and the accompanying documentation make the overall process difficult."

Fifteen responses (30.6%) out of forty-nine responses on the secondary level cited the knowledge of regulations as an obstacle through these statements: "awareness of P.L. demands," "red tape of regulations," "specificity of the regulations," "changing rules once you learn them," "absence of indepth understanding of regulations," "persons needed who are responsible for compliance," "too regulated," "need consistency with regulations," "a need for

inservice on regulations," "changing identification procedures," "knowledge of referral system," and "knowledge of all regulations." On the elementary level one out of thirty-five responses related to the aspect of "regulations" as a constraint. On the secondary level, records as a constraint was listed four times while on the elementary level it was not listed at all. Tables 13 and 14 reflect constraints of elementary and secondary principals with the degree of compliance with legislative procedural requirements.

To differentiate between the secondary level and elementary level, one principal who is now secondary but has been an elementary principal gave this summation:

High school folks like to fudge and go through the process without going through all of the steps of the procedure. In other words they think, well I know Ms. so and so and for that reason we don't have to get signatures or we don't have to get this or that. I didn't find that to be true at all in the elementary schools. The idea of the elementary folks was I want to try to do what is right and I'm going to follow this to the letter of the law. But many high school folks have a tendency to try to circumvent the law or avoid it.

Table 13
 Summary of Constraints by Compliance Categories at the Elementary Level

<u>Low Compliance</u>	<u>Moderate Compliance</u>	<u>High Compliance</u>
1. Parents not agreeing	1. Time	1. Sequence of steps
2. Identification of handicapped and academically gifted students	2. Paperwork	2. Getting all documentation
3. Referral process	3. Lengthy process	3. Getting parents' signatures
4. Evaluation process	4. Contacting parents	4. Paperwork
5. IEP	5. Morale	5. Lack of knowledge of director
6. Need money	6. Emergency placements	6. Lack of interest in fulfilling obligations
7. Parents unwilling to receive services	7. Not enough psychologists	7. Inability to reach parents in a timely fashion
8. Would help to acquaint general public of special needs	8. No elementary counselors	8. Student absences on test dates
9. Educate community	9. Discipline procedures for exceptional children	9. Parents not signing forms
10. Changing criteria	10. Sequence of steps	10. Parents not coming for conferences
11. Paperwork	11. Money	11. Time
12. No counselors for emotional support		12. Too many rules
13. Too much stock in test results		

Table 14
 Summary of Constraints by Compliance Categories at the Secondary Level

<u>Low Compliance</u>	<u>Moderate Compliance</u>	<u>High Compliance</u>
1. Building structure - 4 floors	13. Changing rules once you learn them	1. Changing identification procedures
2. Minor documentation of needed information - some lost	14. Absence of indepth understanding of regulations	2. Communication system
3. Centralized office for records	15. Persons responsible for compliance - view as getting in way of instruction	3. Time
4. Centralized staff for records	16. Sued several times	4. Expertise
5. Biased tests	17. Parents expect more than required	5. Knowledge of referral system
6. Awareness of P.L. 94-142 demands	18. Local groups push special education	6. Knowledge of all regulations
7. Aware of handicap	19. Money for special aides	7. Building barriers
8. Red tape of regulations	20. Unusual needs of special students	8. Money
9. Transportation from one school to another	21. IEP - when mainstreamed	9. More teachers
10. No control over folders	22. Too regulated	
11. Transfer from LEA - getting records	23. Red tape	
12. Specificity of the regulations	24. Need consistency with regulations	
	1. Attitudes of secondary teachers	
	2. Money	
	3. Space	
	4. General attitudes	
	5. Parent cooperation	
	6. Architectural barriers	
	7. Non-conformity of forms	
	8. Need inservice on regulations	
	9. Backlog of re-evaluations	
	10. Communication with regular and special	
	11. Intervention strategies	
	12. Time frame	
	13. Teacher Assistance Teams	
	14. Paperwork	

Summary of Interviews With Principals
and Special Education Directors/Supervisors

Interviews for the study were conducted with twenty-seven North Carolina school administrators, eighteen were principals and nine were special education directors from nine LEAs. In each of the nine LEAs, an interview was conducted with the special education director, one elementary principal and one high school principal. Based on information gathered from the State Department of Public Instruction of North Carolina, districts (LEAs) were classified low, moderate and high compliance. The districts used were LEA 1, LEA 3 and LEA 4 as low compliance; LEA 5, LEA 6 and LEA 7 as moderate compliance; and LEA 9, LEA 11 and LEA 12 as high compliance. An interview guide was developed containing six questions: (1) What are constraints which hinder or prevent you from compliance? (2) Identify indicators or evidence for support of special education programs in your school system? (3) What makes compliance with federal and state regulations of special education difficult for you? (4) What would make it easier for you to implement federal and state regulations? (5) How would you characterize factors that inhibit your progress toward compliance with federal and state regulations? Explain whether factors are cultural, political, ideological or philosophical, bureaucratic, pragmatic, educational, economic. (6) On a five point scale of 1-5 with "5" being the highest, how would you rate your superintendent's support of special education programs?

Interviews were conducted on site at respective schools or the central administration building for twenty interviews, two at the Council for Exceptional Children Conference and five were conducted by telephone contacts. Notes were taken on all interviews. Where permission was granted, interviews were tape recorded and then transcribed. Interviews lasted approximately thirty minutes to one hour. The first took place on November 5, 1985; the final interview was held on December 2, 1985. An interrater reliability test was completed. The rater listened to tapes and reviewed transcripts and developed areas of constraints. There was 9 out of 10 agreement or 90% correspondence with items of constraints presented in the study. There was moderate concurrence by LEAs in listing constraints. The referral process and paperwork were cited by each respondent in LEA 5. Paperwork seemed to have been a theme throughout LEAs 5, 6 and 7. Knowledge and/or concern pertaining to state and federal regulations was expressed by respondents in LEA 1, LEA 3, LEA 4, LEA 5, LEA 6, LEA 11 and LEA 12.

One hundred forty-three identifiable constraints were determined by responses from the twenty-seven interviewees as delineated in Appendix.

SUMMARY OF RESEARCH FINDINGS

A mean of 28 (82.3%) correct responses was found on the 34 item instrument used to assess principals' knowledge. There was a moderate correlation of the knowledge of principals and knowledge of special education directors/supervisors. The value of r for the two groups was 0.62. Principals (86%) surveyed indicated that most of their knowledge on special education legislation came from North Carolina Rules Governing Programs and Services for Children With Special Needs. Additional sources of knowledge came from various sources such as the Special Education Director/Supervisor, North Carolina Association for the Gifted and Talented, SDPI Regional Center, Annual Council on Exceptional Children's Conference, Staff Newsletters, Association of Retarded Citizens, participation in Triple P and Project APEX. The aspect of knowledge did not appear to be significantly related to the degree of compliance with legislative regulations.

Numerous constraints were delineated as factors that prevented total compliance. Respondents cited as major constraints: knowledge of regulations, paperwork, money, time, parent/community awareness and confidentiality and access to records. The constraints did not differ significantly at the elementary and secondary level. Parental cooperation seemed to stand out on the elementary level and the lack of adequate facilities on the secondary level.

Chapter V

SUMMARY, CONCLUSIONS, DISCUSSION, IMPLICATIONS AND RECOMMENDATIONS

The purpose of the study was to determine if a relationship existed between the amount of administrators' knowledge of compliance with the degree of application of legislative regulations of special education. The study further considered factors that prevent total compliance in a local education agency.

Specifically, the purpose of this study was designed to answer these questions:

1. What knowledge exists among principals concerning compliance with federal and state procedural legislative requirements?
2. What relationship exists between the knowledge of the director/supervisor of special education and knowledge of principals?
3. What is the principal's source of knowledge concerning compliance with federal and state procedural legislative requirements?
4. What are identifiable constraints which hinder or prevent compliance?
5. Is there a discernable pattern (or profile) of constraining factors that exist that characterize Local Education Agencies who do not comply with legislative procedural requirements?

6. Is there a difference between constraints of elementary and secondary principals with the degree of compliance with legislative procedural requirements?

The subjects for this study consisted of North Carolina principals and special education directors/supervisors of twelve local education agencies. The study was concerned exclusively with those LEAs who had undergone program compliance visits during the year 1984-85. Therefore, the conclusions derived from this study were also limited to this specific population.

The primary data-gathering device was the opinionnaire. Permission was obtained from the developer to use the opinionnaire for this study. Other important sources of data included were: interviews with selected principals and special education directors/supervisors, Statistical Summary - North Carolina Department of Public Instruction, reports from Division of Exceptional Children - North Carolina Department of Public Instruction, North Carolina School Directory and appropriate resource persons from the Division of Exceptional Children.

After data were collected, they were systematically examined, evaluated and tabulated. The data were then analyzed to determine the relation and relevance to the problem under study. These data are reported in Chapter IV of this study.

The review of the literature revealed a considerable problem involving the principal and his role in compliance with requirements of state and federal legislation. There is need for clarity of the

principal's role in special education in light of special education director/supervisor's responsibility to the entire local education agency.

SUMMARY OF FINDINGS

This study sought to examine six questions. A summary of findings is as follows:

Question One:

What knowledge exists among principals concerning compliance with federal and state procedural legislative requirements? The overall mean knowledge score for all principals was 28 correct responses out of a 34 item rating instrument. The study demonstrates that knowledge did not make a difference on whether a school system was in compliance or not. The maximum correct response, for example, was 33 out of 34 in both low and high compliance school systems. Principals seem to have moderate knowledge with regard to compliance with federal and state procedural legislative requirements.

Question Two:

What relationship exists between the knowledge of the director/supervisor of special education and knowledge of principals?

The agreement between the group of principals and the group of directors/supervisors concerning the level of knowledge of special education legislation was moderate. The minimum number of correct responses for principals was 17 and 26 for special education directors/supervisors. The maximum correct response for both groups was 33.

The value of r was 0.62.

Question Three:

What is the principal's source of knowledge concerning compliance with federal and state procedural legislative requirements?

Responses to each of the items numbered 35-38 indicated that principals (85.7%) received most of their preparation in the area of special education legislation from the North Carolina Rules Governing Programs and Services for Children With Special Needs in an annual review. Based on the open ended question concerning source of knowledge, principals derived additional knowledge from a variety of sources.

Question Four:

What are identifiable constraints which hinder or prevent compliance?

The principals and special education directors/supervisors taking part in this study encountered numerous constraints in attempting to comply with requirements of P.L. 94-142 and Rules Governing Programs and Services for Children With Special Needs. The most serious reported constraints were the constant changes in regulations, the enormity of paperwork, time and money. The constraints encountered were coded into 143 responses. Of the total sample the respondents indicated that constant changes in regulations were a barrier to compliance. According to respondents, changes in regulations hindered their understanding and interpretations of special education regulations. From the total sample of 27 respondents, the following were listed as the most frequent constraints: knowledge and changes in regulations (51.8%), excessive

paperwork (44.4%), money (40.7%), time (40.7%), parent and community concerns (22.2%) and records (18.5%).

Question Five:

Is there a discernable pattern (or profile) of constraining factors that exist that characterize Local Education Agencies who do not comply with legislative procedural requirements?

Several variables characterized respondents from the local education agencies who participated in the study. The most frequently cited were money, knowledge and changes in regulations, and interpretations of special education regulations. There was an indication that there were discrepancies in interpretation of regulations by personnel who made program compliance visits. From the total sample of responses 48.1 percent, 40.7 percent, and 25.9 percent and 14.8 percent of the respondents respectively cited knowledge and changes in regulations, referral process, money and building facilities as the most frequent constraints in complying with federal and state legislation.

Question Six:

Is there a difference between constraints of elementary and secondary principals with the degree of compliance with knowledge procedural requirements?

There were slight differences found to exist in the responses of elementary and secondary principals with the degree of compliance with legislative procedural requirements. Of the nineteen responses from elementary principals on inhibiting factors affecting compliance, eleven

(57.9 percent) of those respondents in LEAs categorized as low and moderate compliance indicated that the referral process was a major obstacle. On the other hand, eight (42.10 percent) of responses from LEAs categorized as high compliance cited the referral process. At the secondary level, nine (81.8 percent) out of eleven responses from LEAs categorized as low and moderate compliance cited constant changes and knowledge of regulations as a difficulty while two (18.2 percent) responses from LEAs classified as high compliance denoted this area.

For the remaining constraints, there were slight variations by school levels in the responses of principals to problems encountered with legislative regulations of special education. For example, on the secondary level, building facilities was listed by one respondent from each of the groups of LEAs classified low, moderate and high compliance. Building facilities was cited as a constraint by one elementary principal. On the other hand parent contacts as a constraint was only cited by elementary respondents which was inclusive of all three categories of low, moderate and high compliance.

CONCLUSIONS

From an overall perspective, administrators surveyed in North Carolina do possess adequate knowledge to address compliance with federal and state legislative procedural requirements for special education. Major conclusions in the study were (a) knowledge did not make a difference in the school system's compliance with state and federal procedural legislative requirements (b) there were numerous

constraints six of which permeated the study as knowledge understanding of regulations, excessive paperwork, money, time, parent/community awareness and maintenance of records (c) local education agencies who were in 100% compliance did not differ significantly from schools who did not comply in the identification of factors which prevent compliance with state and federal legislative procedural requirements.

DISCUSSION AND IMPLICATIONS

Though there was adequate knowledge of the principals in the study, the responses on the opinionnaire fluctuated. Subsequently, it was surmised that a sufficient knowledge existed for the respondents throughout the opinionnaire items. There were nineteen principals who scored below 71%. There were responses with a range of 17-23 (50 to 68 percent). The total correct responses ranged from 17 (50 percent) to 33 (97 percent). The mean correct response score was 28 (82.3%). The sufficiency of the knowledge level was not addressed in this study. Principals (86%) surveyed indicated that most of their knowledge came from North Carolina Rules Governing Programs and Services for Children With Special Needs. Sixty percent of the principals according to the survey obtained their knowledge from inservice training in special education legislation as part of the annual LEA staff development.

Respondents showed most knowledge in the areas of IEP development, appropriate times for parental written permissions and the school-based committee process. An explanation for these results may be related to the fact that principals are closely involved with these processes on

a regular basis. Unexpected was the high number of correct responses concerning school-based committee functions since 78 percent of this area was out of compliance according to the SDPI report. The results could have been attributed to three factors: (1) Upon the completion of the program compliance visits, some principals may have upgraded their knowledge. Twenty-seven principals responded to the open ended question on the opinionnaire "as a result of being notified by the State Department of your compliance status during 1984-85, did you take steps to learn more about the area of deficiency?" (2) The nature of the opinionnaire to discern knowledge. It is somewhat likely in the survey process that assistance was given in completion of the opinionnaire. (3) The selection process of 12 LEAs out of 32 who actually underwent the compliance review during 1984-85.

The principals' knowledge was less adequate in evaluation procedures which encompassed special identification, required screening and post evaluation. Those areas corroborate the findings of the non-compliance issues cited in monitoring visits of 1984-85 as demonstrated in Table 1, page 5. The evaluation procedures which were in highest non-compliance ranged from 56 percent to 78 percent out of compliance. Evaluation procedures are usually delegated to diagnosticians and/or psychologists. Principals rarely have responsibility in the evaluation process. Finally, the knowledge of the principals was moderately correlated with the knowledge of special education directors/supervisors. The r value was 0.62.

The knowledge level of special education directors/supervisors exceeded that of the mean knowledge of principals in nine LEAs. In one LEA, the knowledge level was the same and in two LEAs, the knowledge level of the principals exceeded that of the special education directors/supervisors. Similarly, there were numerous maximum scores of 33 for principals whereas the maximum score of 33 characterized only one special education director/supervisor. These results are particularly noteworthy inasmuch as the principal looks to the special education director for guidance. Betz (1977) in his study contended that the principal is dependent on the special education administrator's expertise. One principal interviewed in the present study indicated that a constraint to compliance with special education regulations could be the lack of knowledge of the special education director/supervisor. A crucial point is that North Carolina does not require certification in special education administration as a requirement for the program administrator or director/supervisor. In many instances a person is simply assigned the responsibility of director/supervisor. In this study when special education directors/supervisors were asked about certification, one indicated "no" and one gave "no response." As to educational training, there was one no response, one bachelors degree, eight masters degree and two doctorate degrees.

The present study both supported and differed in studies on constraints in several major ways. First, the study identified a major constraint as interpretation and consistency of regulations. Welsch

(1980) in his study suggested that developing an understanding of the requirements of the law is essential. This study alluded to discrepancy in interpretations of those who monitor the law and those who implement the law. Polifka's (1981) research was similar in that he discussed the variable of staff knowledge of legislative requirements as a factor in a school system's level of compliance.

Another constraint was excessive paperwork. In the Bi-Weekly Issue of Education of the Handicapped (1985) paperwork was found to be unwieldy by both state and federal officials as a result of South Carolina being fully monitored by the U. S. Department of Education.

Money and time were also cited as primary constraints. Drucker (1974) indicated that financial resources, structure and management style facilitated organizational effectiveness. Likewise Bourexis (1978) found in his study that sufficiency of human, fiscal, physical and material resources as some of the factors needed to achieve full implementation with state and federal regulations. Time as a constraint was also supported by Welsch (1980). The referral process as a constraint was supported by Christenson and Yseldyke (1982).

Of all the major constraints delineated, there was one that specifically related to non-compliance issues cited from the SDPI report. The issue was the referral process which accounted for 22 percent non-compliance of the LEAs who underwent compliance reviews in 1984-85. This was a reduction from 46 percent in 1983-84. An area for further study certainly needs to be an analysis of the constraints identified

here. This analysis should attempt to look beyond the stated concerns and identify those factors which may be beyond the scope of knowledge and limited resources. Attitude, commitment and personal power or behavior may have implications in the area of compliance. The design of the study did not lend itself to an indepth exploration of constraints as personnel issues, morale et al that may have affected the implementation of the compliance process.

The study differed significantly from other studies in that it is the only identified study which delineates constraints by local education agencies according to how they complied with federal and state requirements. Numerous constraints were cited as factors that prevented total compliance. The aspect of knowledge however did not appear to be significantly related to the degree of compliance.

Because of the identifiable constraints, there are a number of recommended implications for practices. The central administration should therefore initiate needs assessments which would determine specific program needs at the building level so as to eliminate constraints principals are now experiencing. Some suggested strategies to eliminate constraints include these:

centralized office for all the confidential records in the system, filed by school and then sub-filed by teacher/classes is recommended.

a centralized staff person whose sole responsibility would be to maintain confidential records, send out necessary correspondence, file required information as it is forwarded by teachers, and oversee the general maintenance of records is recommended.

Additionally, the State Department and higher education officials should take the following actions:

consider certification in special education administration for directors/supervisors.

consider infusing additional special education courses as part of the required curriculum for principals.

The principals taking part in this study have encountered numerous constraints in attempting to comply with state and legislative procedural requirements of special education. They have played an active role in the implementing procedures designed to achieve compliance with state and federal legislation. All principals in compliance or out of compliance had similar constraints in complying with state and legislative procedural requirements of special education.

On the state level, the study suggested a need for consistent communication of interpretations and a need to establish a common interpretation among those who are being monitored for compliance and ones who monitor. There is a need for courses in special education legislation and its impact on schools should be explored on the higher education level. It can be surmised from the study that special education courses for principals surveyed in North Carolina range from minimal to non-existent. Yules (1985) concluded in her study that special education courses need to be infused into general education administration training so as to enhance the knowledge of those persons responsible for implementation of special education administration.

RECOMMENDATIONS FOR FURTHER STUDY

In view of the findings, conclusions and implications, the following recommendations for further study are proposed:

1. The constraints listed by Program Administrators and principals should be qualitatively examined so that technical assistance and staff development can realistically address how they can be overcome. This should be accomplished by an investigative interview mode of study.
2. If knowledge is a significant factor in compliance/non-compliance, further study may be needed to determine the critical factors.
3. A study should be done to determine to what degree does the leadership of the Special Education Director/Supervisor, Superintendent of Schools or Board of Education impact special programs at the local level.
4. Because of the concern of both special education directors/supervisors and principals, a study should be done to determine alternative ways of funding exceptional childrens' programs.
5. A study should be done to determine how such initiatives such as Project APEX and Triple P influence the knowledge level and attitudes of administrators, board members, superintendents and teachers in regard to exceptional childrens' programs.
6. A study should be done on ways to lessen bureaucracy in order to more effectively meet the needs of exceptional children.

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APPENDIX A
Opinionnaire

Local Education Agency Number: _____
 Enrollment (1984-85): _____
 Type of Administrative _____
 School Unit: County _____
 City _____

OPINIONNAIRE

Please check and/or complete the following items in the column which applies to you.

PRINCIPALS

Number of years as a principal: _____

Number of years total classroom teaching experience: _____

Degree(s): Bachelors _____
 Masters _____
 Six Year _____
 Doctorate _____
 Other _____

Do you have a certification in Special Education?
 Yes _____
 No _____

If no, how many continuing education units have you earned in Special Education?
 None _____
 1 to 3 _____
 4 to 6 _____
 7 to 9 _____
 More than 9 _____

Do you have tenure?
 Yes _____
 No _____

SPECIAL EDUCATION ADMINISTRATORS

Number of years as a special education administrator: _____

Number of years total classroom teaching experience: _____

Degree(s): Bachelors _____
 Masters _____
 Six Year _____
 Doctorate _____
 Other _____

Do you have a certification in Special Education?
 Yes _____
 No _____

If no, how many continuing education units have you earned in Special Education?
 None _____
 1 to 3 _____
 4 to 6 _____
 7 to 9 _____
 More than 9 _____

Do you have tenure?
 Yes _____
 No _____

The purpose of this opinionnaire is to assess your understanding and sources of information concerning federal and state legislative procedural requirements pertaining to special education. Please respond to each item on this survey by marking yes, no, or undecided as to legislative requirements. Do not think a long time over your answers, but give them quickly as they come to your mind. Feel free to write additional information on the survey but not on the answer sheet.

Key: A - Yes
 B - No
 C - Undecided

	Yes	No	Undecided
Example: Written parental permission for placement is obtained before a student receives special education related services.	A		
1. Individual Education Programs (IEPs) are treated as confidential records.			
2. Written parental permission is obtained when screening and/or evaluation require the administration of instruments, interviews or other procedures used selectively with an individual student.			
3. The Individualized Education Program (IEP) must include all of the following: present level of educational functioning; annual goals, short-term objectives; special and related services; extent in regular education and description of program; dates of service initiation and duration; and objective evaluative criteria.			
4. Deficits in adaptive behavior are considered and documented in the diagnosis of mentally handicapped students.			

The purpose of this opinionnaire is to assess your understanding and sources of information concerning federal and state legislative procedural requirements pertaining to special education. Please respond to each item on this survey by marking yes, no, or undecided as to legislative requirements. Do not think a long time over your answers, but give them quickly as they come to your mind. Feel free to write additional information on the survey but not on the answer sheet.

Key: A - Yes
 B - No
 C - Undecided

	Yes	No	Undecided
5. Written parental consent is obtained before a student's educational records are released to school officials within the local education agency (LEA) having a legitimate educational interest in the student or to another local education agency (LEA) where the student intends to enroll.			
6. The diagnosis of a potential pupil with specific learning disabilities involves: determining current intellectual functioning; calculating age standard scores on achievement; determining discrepancy from the age standard scores and current intellectual ability utilizing an item analysis.			
7. Within 15 calendar days, after the evaluation is completed, the student's parent(s) or guardian(s) is sent a written summary of the evaluation results and findings along with proposals for meeting the student's educational needs.			
8. The parent(s) or guardian(s) signs the Individualized Education Program (IEP) to signify agreement with the program.			

The purpose of this opinionnaire is to assess your understanding and sources of information concerning federal and state legislative procedural requirements pertaining to special education. Please respond to each item on this survey by marking yes, no, or undecided as to legislative requirements. Do not think a long time over your answers, but give them quickly as they come to your mind. Feel free to write additional information on the survey but not on the answer sheet.

Key: A - Yes
B - No
C - Undecided

	Yes	No	Undecided
9. The Individualized Education Program (IEP) is revised as often as determined necessary, but at least annually.			
10. When the administrative placement committee makes a decision regarding placement, it is then the responsibility of the school-based committee to ensure that an appropriate Individualized Education Program (IEP) is developed.			
11. A sign-off sheet should be available for persons to sign before reviewing confidential records of a special needs student.			
12. If the parent(s) or guardian(s) consent, the local education agency (LEA) provides or chooses to be provided an appropriate evaluation within 30 calendar days after sending the notice.			
13. The written notice to the parent(s) or guardian(s) inviting them to the Individualized Education Program (IEP) meeting includes: purpose of the meeting; time of the meeting; location of the meeting; and persons who will be in attendance.			
14. Academically Gifted screening and evaluation includes: IQ percentile; achievement percentiles and performance data.			

The purpose of this opinionnaire is to assess your understanding and sources of information concerning federal and state legislative procedural requirements pertaining to special education. Please respond to each item on this survey by marking yes, no, or undecided as to legislative requirements. Do not think a long time over your answers, but give them quickly as they come to your mind. Feel free to write additional information on this survey but not on the answer sheet.

Key: A - Yes
 B - No
 C - Undecided

	Yes	No	Undecided
15. Speech and/or language impaired evaluation includes hearing screening, education evaluation, and speech and language evaluation.			
16. Parents are given a copy of their due process rights at the Individualized Education Program (IEP) meeting.			
17. The administrative placement committee makes all final decisions regarding placement of students in programs for exceptional children.			
18. Referral or nomination forms are on file for Academically Gifted (AG) students placed after 1978.			
19. The school-based committee discusses appropriate placement alternatives with the parent(s) or guardian(s) and recommends, in writing, to the administrative placement committee the type of placement which would meet the educational needs of the student.			
20. A list of persons having access to confidential records is posted or available.			

The purpose of this opinionnaire is to assess your understanding and sources of information concerning federal and state legislative procedural requirements pertaining to special education. Please respond to each item on this survey by marking yes, no, or undecided as to legislative requirements. Do not think a long time over your answers, but give them quickly as they come to your mind. Feel free to write additional information on the survey but not on the answer sheet.

Key: A - Yes
 B - No
 C - Undecided

	Yes	No	Undecided
21. The official date of a referral is the date the parent(s) gives written permission for testing.			
22. When students suspected of having specific learning disabilities are screened and evaluated, deficits in psychomotor and adaptive behavior are documented.			
23. Students who are recommended for Academically Gifted placement receive a composite of 98 points on the AG profile sheet.			
24. The Individualized Education Program (IEP) is developed and written by: a local education agency (LEA) representative other than the student's teacher; the parent(s) or guardian(s); the student when appropriate; and other individuals involved in evaluation and treatment at the discretion of the local education agency (LEA) or the parent.			
25. The school-based committee reviews referral information for students suspected of needing special education services.			
26. The learning disability report includes educationally relevant medical findings and the effects of environmental, cultural or economic disadvantages.			

The purpose of this opinionnaire is to assess your understanding and sources of information concerning federal and state legislative procedural requirements pertaining to special education. Please respond to each item on this survey by marking yes, no, or undecided as to legislative requirements. Do not think a long time over your answers, but give them quickly as they come to your mind. Feel free to write additional information on the survey but not on the answer sheet.

Key: A - Yes
 B - No
 C - Undecided

	Yes	No	Undecided
27. When the parent disagrees with an evaluation, the local education agency (LEA) either pays for an independent evaluation or ensures that the evaluation is provided at no cost to the parents.			
28. The local education agency (LEA) keeps a list of hearing officers, including qualification of each person to serve in this capacity.			
29. Written parental consent is obtained before the initial placement of a child with special needs in a program providing special education and related services.			
30. A written notice is sent to parent(s) or guardian(s) before the local education agency (LEA) initiates or changes identification, evaluation, individualized education program, or educational placement.			
31. Reevaluations of exceptional children, which include the type of screening and evaluation required prior to initial placement, are completed at least every three years.			

The purpose of this opinoinnaire is to assess your understanding and sources of information concerning federal and state legislative procedural requirements pertaining to special education. Please respond to each item on this survey by marking yes, no, or undecided as to legislative requirements. Do not think a long time over your answers, but give them quickly as they come to your mind. Feel free to write additional information on the survey but not on the answer sheet.

Key: A - Yes
 B - No
 C - Undecided

	Yes	No	Undecided
32. A referral addresses specific problems the student is experiencing in academic performance and/or noted behaviors including strengths and weaknesses.			
33. All screening and evaluation is current or given within the last three years.			
34. A referral is made in writing when a teacher or other person involved with a student recognizes that his/her educational needs are not being met.			
35. Preservice training in special education legislation was a part of your college curriculum.			
36. Inservice training in special education legislation is part of your annual LEA staff development.			
37. Graduate courses have been taken in special education legislation since becoming a principal.			
38. The legislative requirements from the North Carolina Rules Governing Programs and Services for Children with Special Needs are reviewed annually.			

ADDITIONAL INFORMATION

39. List additional sources of information pertaining to special education legislation. (places or persons from whom you gained information)

40. As a result of being notified by the State Department of your compliance status during 1984-85, did you take steps to learn more about the area of deficiency. If the answer is yes, please describe how.

41. If you are a special education director/supervisor, what other roles or responsibilities do you have such as Chapter I Coordinator, etc. in your school system?

APPENDIX B
Interview Questions

INTERVIEW GUIDE

The following items are part of the criteria used in effecting compliance in an individual school or school district:

Child Identification and Location	Least Restrictive Environment
Right to an Education	Pupil Teacher Ratio
Referral	Due Process Procedures
Evaluation	Confidentiality and Access to Records
Placement	Qualifications and Certification of Educational Personnel
Individualized Education Program (IEP) or Group Education Program (GEP)	Comprehensive System of Personnel Development
	Building Facilities

1. What are constraints which hinder or prevent you from compliance?
2. Identify indicators or evidence for support of special education programs in your school system.
3. What makes compliance with federal and state regulations of special education difficult for you?
4. What would make it easier for you to implement federal and state regulations?
5. How would you characterize factors that inhibit your progress toward required compliance with federal and state regulations? Explain.
 - cultural
 - political
 - ideological or philosophical
 - bureaucratic
 - pragmatic
 - educational
 - economic
6. On a five point scale of 1-5 with "5" being the highest, how would you rate your superintendent's support of special education programs?

Definition of Constraints: factors that inhibit accomplishment or fulfillment of procedures.

APPENDIX C

Interview Schedule

Interview Schedule

NOVEMBER

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1	2
3	4	5 Respondent Y Respondent M	6 Respondent B Respondent A	7 Respondent U Respondent T	8 Respondent S Respondent J Respondent K	9
10	11 Respondent ZZ Respondent Z	12 Respondent W Respondent V Respondent X	13	14	15 Respondent L	16
17	18 Respondent N Respondent O	19	20 Respondent F Respondent I	21 Respondent E Respondent D	22 Respondent H Respondent G	23
24	25 Respondent R Respondent P Respondent Q	26	27	28	29 Respondent C	30

APPENDIX D

Letter from the Superintendent

P.O. BOX 789
HIGH POINT, N.C. 27261
(919) 885-5161

C. OWEN PHILLIPS
SUPERINTENDENT

September 26, 1985

**Mrs. Lillie M. Jones
Associate Superintendent
High Point Public Schools
High Point, NC 27261**

Dear Lillie:

You may use this letter as your authorization to pilot test the attached research instrument by surveying selected principals in the High Point Public School system as a part of your requirements for the doctoral program at Virginia Polytechnic Institute.

I wish you much success in the program and trust you will let me know where I may assist you further.

Sincerely,

**C. Owen Phillips
Superintendent**

**g
encl.**

APPENDIX E

Letter to Principals and
Special Education Directors/Supervisors

October 4, 1985

Dear Colleague:

I need your help!

Currently, I am enrolled as a doctoral student at Virginia Polytechnic Institute and State University in the area of Educational Administration.

As the present time, I am conducting research for my doctoral dissertation. The research will examine the relationship between local constraints and level of administrative knowledge with the degree of application with regulations of special education.

Attached is an opinionnaire that I am requesting you to complete. The information gathered from this opinionnaire will be confidential.

In order to be successful, your participation is valuable. Your prompt return of this opinionnaire by October 30, 1985 is very important.

Thank you for assisting me in this study.

Sincerely yours,

Lillie M. Jones

Enclosure

APPENDIX F

Principals' and Special Education
Directors/Supervisors' Demographic Information

Demographic Information of Principals

Characteristics N = 140

Administrative Experience

Years in Present Position

0-5	40	28.6%
6-10	30	21.4%
11-15	21	15.0%
16-20	33	23.6%
21-25	12	8.6%
26-30	2	1.4%
31-35	1	.7%
Over 35	1	.7%

Classroom Teaching Experience

0-5	39	27.9%
6-10	49	35.0%
11-15	23	16.4%
16-20	15	10.7%
21-25	8	5.7%
26-30	5	3.6%
Over 31	1	.7%

Educational Training

Bachelors	1	.7%
Masters	72	51.4%
Six Year	50	35.7%
Doctorate	17	12.1%

Demographic Information of Principals continued

Certification in Special
Education

No Response	1	.7%
Yes	16	11.4%
No	123	87.9%

Continuing Units in
Special Education

No Response	17	12.1%
None	54	38.6%
1-3	25	17.9%
4-6	20	14.3%
7-9	8	5.7%
More than 9	16	11.4%

Tenured Status

No Response	3	2.1%
Yes	120	85.7%
No	17	12.1%

Demographic Information of Special Education Directors/Supervisors

Characteristics

N = 12

Administrative Experience

Years in Present Position

0-5	5	38.5
6-10	6	46.2
11-15	1	15.4

Classroom Teaching Experience

0-5	5	38.5
6-10	6	46.2
11-15	1	15.4

Educational Training

No Response	1	7.7
Bachelors	1	7.7
Masters	8	66.7
Doctorate	2	17.8

Certification in Special
Education

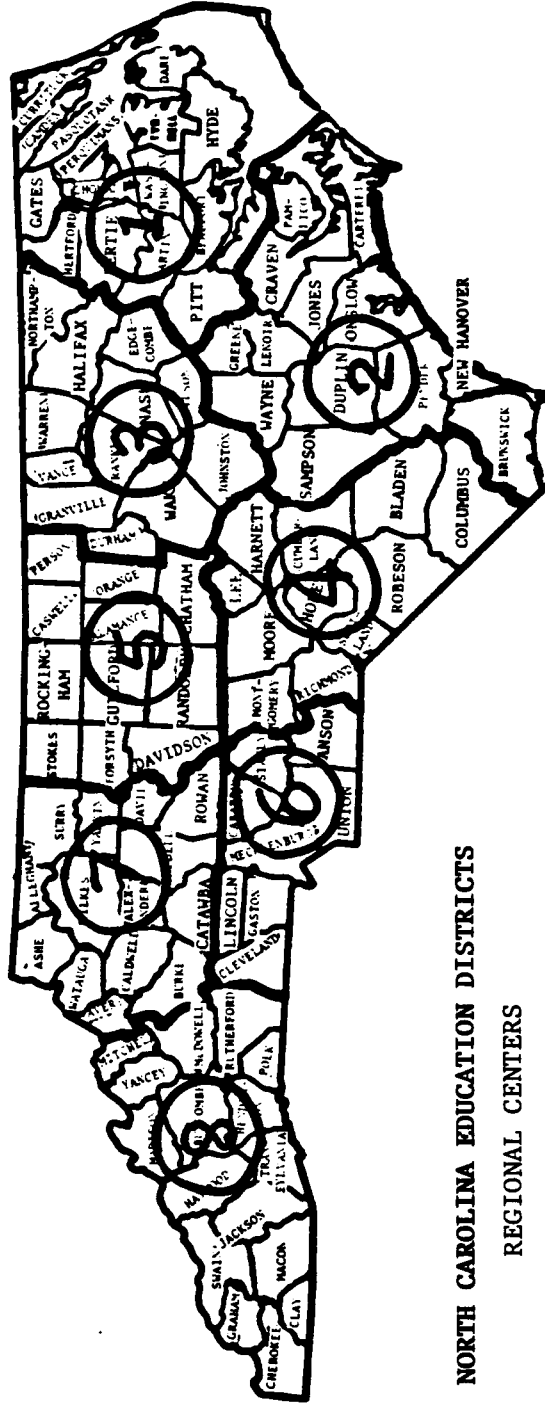
No Response	1	7.7
Yes	10	83.7
No	1	7.7

Continuing Units in
Special Education

No Response	8	66.0
1-3	2	17.0
4-6	0	0
7-9	0	0
More than 9	2	17.0

APPENDIX G

North Carolina Education Districts



NORTH CAROLINA EDUCATION DISTRICTS

REGIONAL CENTERS

- 1. Northeast, Williamston
- 2. Southeast, Jacksonville
- 3. Central, Knightdale
- 4. South Central, Carthage
- 5. North Central, Greensboro
- 6. Southwest, Charlotte
- 7. Northwest, North Wilkesboro
- 8. Western, Canton

* Rowan County, although in Education District 7, is served by the Southwest Regional Center in Charlotte.

APPENDIX H

Total Listing of Constraints by
Respondents Interviewed

Total Listing of Constraints by Respondents Interviewed

1. Building structure - 4 floors
2. Minor documentation of needed information - some gets lost
3. Centralized office for records
4. Centralized staff for records
5. Biased tests
6. Awareness of P.L. 94-142 demands
7. Awareness of handicap students abilities
8. Red tape of regulations
9. Parents not agreeing on placements
10. Identification of handicap and academically gifted students
11. Referral process
12. Evaluation process
13. IEP development
14. Need money
15. Lack of sufficient time for teachers to complete required documentation
16. Insufficient central office staff to monitor system documentation
17. Need to delete some uncooperative personnel
18. Frequency with which regulations are changed.
19. Variety of interpretations of regulations
20. Very poor county
21. Funding formula - money
22. Public education
23. Unusual expectations of public and parents
24. Paperwork
25. Transport records from one school to another
26. No control over folder
27. Transportation from other LEAs - getting records
28. Specificity of the regulations
29. Changing rules once you learn them
30. Absence of indepth understanding of regulations
31. Need persons responsible for compliance - teachers view as getting in way of instruction
32. Parents unwilling to receive services
33. Would help to acquaint general public of special needs
34. Educating community
35. Attitudes
36. No local money
37. LEA positions not always used for Special Education
38. Other LEA personnel - not knowledgeable

39. Too busy to inservice principals
40. Assistant Superintendent overlooks special education
41. Only teachers and director knowledgeable
42. Principals need knowledge
43. Need money/related services
44. Need clerical assistance
45. Staff development for administrators and school board
46. Need advisory council
47. Money
48. Changing criteria
49. Paperwork
50. No counselors for emotional problems
51. Too much stock in test results
52. Sued several times
53. Parents expect more than required
54. Local groups push special education
55. Money - for special aides
56. Unusual needs of special students
57. IEP when mainstreamed
58. Teachers not always certified
59. Too regulated
60. Red tape
61. Need consistency with regulations
62. Timelines
63. Near/far vision tests - how to do
64. Paperwork
65. No time to see teachers
66. Changes in guidelines
67. Time
68. Paperwork
69. Lengthy process of testing and placement
70. Attitudes of secondary teachers
71. Money
72. Space
73. Attitudes
74. Teacher inservice
75. Size of county
76. Paperwork
77. Attitudes
78. Contacting parents
79. Paperwork
80. Timelines - morale
81. Parent cooperation
82. Architectural barriers
83. Non-conformity of forms between LEAs
84. Need inservice on regulations
85. Facilities
86. Money
87. Resources
88. Time
89. CAP funding
90. Paperwork

91. Backlog - reevaluations
92. Communication about regulations with special teachers
93. Intervention strategies
94. Time frame
95. Teacher Assistance Teams
96. Paperwork
97. Attitudes
98. Least restrictive environment
99. Emergency placements - hearing impaired
100. Time
101. Not enough psychologists
102. No elementary counselors
103. Discipline procedures for exceptional children
104. Sequence of steps
105. Money
106. Finding personnel
107. Fundings
108. CAPS
109. Sequence of procedures
110. Getting all documentation
111. Getting parents signatures
112. Paperwork
113. Changing identification procedures
114. Communication system
115. Time
116. Time
117. Expertise
118. Knowledge of referral system
119. Knowledge of all regulations
120. Least restrictive environment
121. Getting records on group home students
122. Timelines
123. Paperwork
124. Reliance on test scores
125. Change
126. Lack of knowledge of director
127. Lack of interest in fulfilling obligations
128. Time
129. Teachers priority not records
130. Principals priority not records
131. Consistency of understanding
132. Money
133. So many details to placement process
134. Paperwork
135. Inability to reach parents in timely fashion
136. Student absences on test dates
137. Parents not signing forms
138. Parents not coming for conferences
139. Time
140. Too many rules
141. Building barriers
142. Money
143. More teachers

APPENDIX I
Summary of Constraints by
Respondents from LEAs Categorized
as Low Compliance

Summary of Constraints by Respondents from LEAs

Categorized as Low Compliance

1. Building structure - 4 floors - difficult to move wheelchairs
2. Minor documentation of needed information - some gets lost
3. Centralized office for records
4. Centralized staff for records
5. Biased tests
6. Awareness of P.L. 94-142 demands
7. Awareness of handicap students abilities
8. Red tape of regulations
9. Parents not agreeing on placements
10. Identification of handicap and academically gifted students
11. Referral process
12. Evaluation process
13. IEP development
14. Need money
15. Very poor county
16. Public education
17. Unusual expectations of public and parents
18. Paperwork
19. Transport records from one school to another
20. No control over folder
21. Transportation from other LEAs and getting records
22. Specificity of the regulations

23. Changing rules once you learn them
24. Absence of indepth understanding of regulations
25. Need persons responsible for compliance - teachers view as getting in way of instruction
26. Parents unwilling to receive services
27. Would help to acquaint general public with special needs
28. Educating community
29. Attitudes
30. LEA positions not always used for special education
31. Other LEA personnel - not knowledgeable
32. Too busy to inservice principals
33. Assistant superintendent overlooks special education
34. Only teachers and director knowledgeable
35. Principals need knowledge
36. Need clerical assistance
37. Staff development for administrators and school board
38. Need advisory council
39. Changing criteria
40. No counselors for emotional problems
41. Too much stock in test results
42. Sued several times
43. Parents expect more than required
44. Local groups push special education
45. Unusual needs of special students

46. IEP when mainstreamed
47. Teachers not always certified
48. Too regulated
49. Need consistency with regulations
50. Lack of sufficient time for teachers to complete required documentation
51. Insufficient central office staff to monitor system documentation
52. Need to delete (sic) some uncooperative personnel
53. Frequency with which regulations are changed
54. Variety of interpretations of regulations

APPENDIX J

Summary of Constraints by
Respondents from LEAs Categorized
as Moderate Compliance

Summary of Constraints by Respondents from LEAs

Categorized as Moderate Compliance

1. Timelines
2. Near/far vision tests - how to do
3. Paperwork
4. No time to see teachers
5. Changes in guidelines
6. Time
7. Lengthy process of testing and placement
8. Attitudes
9. Money
10. Space
11. Teacher inservice
12. Size of county
13. Contacting parents
14. Parent cooperation
15. Architectural barriers
16. Non-conformity of forms between LEAs
17. Need inservice on regulations
18. Facilities
19. Resources
20. CAP funding
21. Backlog - re-evaluations

22. Communication about regulations/special teachers
23. Intervention strategies
24. Time frame
25. Teacher Assistance Team
26. Least restrictive environment
27. Emergency placements - hearing impaired
28. Not enough psychologists
29. No elementary counselors
30. Discipline procedures for exceptional children
31. Sequence of steps

APPENDIX K

Summary of Constraints
by Respondents from LEAs
Categorized as High Compliance

Summary of Constraints by Respondents from LEAs
Categorized as High Compliance

1. Finding personnel
2. CAPS Funding
3. Sequence of procedures
4. Getting all documentation
5. Getting parents signatures
6. Paperwork
7. Changing identification procedures
8. Communication system
9. Time
10. Expertise
11. Knowledge of referral system
12. Knowledge of all regulations
13. Least restrictive environment
14. Getting records on group home students
15. Timelines
16. Reliance on test scores
17. Change
18. Lack of knowledge of director
19. Lack of interest in fulfilling obligations
20. Teachers priority not records
21. Principals priority not records
22. Consistency of understanding

23. So many details to placement process
24. Inability to reach parents in timely fashion
25. Student absences on test dates
26. Parents not signing forms
27. Parents not coming for conferences
28. Too many rules
29. Building barriers
30. More teachers

APPENDIX L
Summary of Constraints by
Elementary Principals

Summary of Constraints by Elementary Principals

1. Parents not agreeing
2. Identification of handicap and academically gifted students -
LEA monies
3. Referral process
4. Evaluation process
5. IEP
6. Need money
7. Parents unwilling to receive services
8. Would help to acquaint general public with special needs
9. Educate community
10. Changing criteria
11. Paperwork
12. No counselors for emotional problems
13. Too much stock in test results
14. Time
15. Lengthy process
16. Contacting parents
17. Paperwork
18. Morale
19. Emergency placements
20. Not enough psychologists
21. No elementary counselors
22. Disciplinary procedures for exceptional children

23. Sequence of steps
24. Sequence of procedures
25. Getting all documentation
26. Getting parents signatures
27. Building barriers
28. More teachers

APPENDIX M

Summary of Constraints by
Secondary Principals

Summary of Constraints of Secondary Principals

1. Building structure - 4 floors
2. Minor documentation of needed information - some lost
3. Centralized office for records
4. Centralized staff for records
5. Biased tests
6. Awareness of P.L. demands
7. Awareness of handicap abilities
8. Red tape of regulations
9. Transportation from one school to another
10. No control over folder
11. Transfer from other LEA - getting records
12. Specificity of the regulations
13. Changing rules once you learn them
14. Absence of indepth understanding of regulations
15. Persons responsible for compliance - view as getting in way of instruction
16. Sued several times
17. Parents expect more than required
18. Local groups push special education
19. Money for special aides
20. Unusual needs of special students
21. IEP - when mainstreamed
22. Teachers not always certified

23. Too regulated
24. Red tape
25. Need consistency with regulations
26. Attitudes of secondary teachers
27. Money
28. Space
29. Parent cooperation
30. Architectural barriers
31. Non-conformity of forms between LEAs
32. Need inservice on regulations
33. Backlog - re-evaluations
34. Communication between regular and special teachers
35. Intervention strategies
36. Teacher Assistance Teams
37. Changing identification procedures
38. Communication system
39. Time
40. Expertise
41. Knowledge of referral system
42. Knowledge of all regulations
43. More teachers

APPENDIX N
Opinionnaire Items by
Compliance Categories of Principals

Opinionnaire Items by Compliance Categories of Principals

LOW COMPLIANCE:

<u>Item</u>	<u>N</u>	<u>Mean</u>	<u>Standard Deviation</u>
Opin 1	45	1.1333	.3438
Opin 2	45	1.0222	.1491
Opin 3	45	1.0222	.1491
Opin 4	43	1.0930	.2939
Opin 5	39	1.5128	.5064
Opin 6	42	1.0000	.0000
Opin 7	42	1.3571	.4850
Opin 8	45	1.0222	.1491
Opin 9	45	1.0222	.1491
Opin 10	41	1.0732	.2637
Opin 11	44	1.0227	.1508
Opin 12	33	1.1515	.3641
Opin 13	44	1.1136	.3210
Opin 14	42	1.0000	.0000
Opin 15	43	1.0465	.2131
Opin 16	39	1.4103	.4983
Opin 17	42	1.1429	.3542
Opin 18	31	1.0968	.3005
Opin 19	45	1.0667	.2523
Opin 20	44	1.1591	.3700
Opin 21	31	1.5806	.5016
Opin 22	40	1.2000	.4051
Opin 23	31	1.1935	.4016
Opin 24	42	1.5238	.5055
Opin 25	45	1.0889	.2878
Opin 26	41	1.1707	.3809
Opin 27	28	1.4286	.5040
Opin 28	36	1.1111	.3187
Opin 29	45	1.0222	.1491
Opin 30	45	1.0222	.1491
Opin 31	45	1.0000	.0000
Opin 32	39	1.0256	.1601
Opin 33	37	1.0270	.1644
Opin 34	37	1.1081	.3148

MODERATE COMPLIANCE:

<u>Item</u>	<u>N</u>	<u>Mean</u>	<u>Standard Deviation</u>
Opin 1	74	1.0541	.2277
Opin 2	75	1.0000	.0000
Opin 3	72	1.0000	.0000
Opin 4	72	1.0139	.1179
Opin 5	71	1.5775	.4975
Opin 6	71	1.0423	.2026
Opin 7	61	1.3115	.4669
Opin 8	73	1.1233	.3310
Opin 9	74	1.0135	.1162
Opin 10	71	1.1408	.3503
Opin 11	73	1.0274	.1644
Opin 12	62	1.0484	.2163
Opin 13	73	1.0411	.1999
Opin 14	70	1.0000	.0000
Opin 15	69	1.0145	.1204
Opin 16	64	1.1406	.3504
Opin 17	73	1.2603	.4418
Opin 18	54	1.1481	.3586
Opin 19	72	1.1250	.3330
Opin 20	71	1.0563	.2322
Opin 21	54	1.4444	.5016
Opin 22	70	1.1429	.3525
Opin 23	55	1.3091	.4664
Opin 24	64	1.4688	.5030
Opin 25	74	1.0135	.1162
Opin 26	66	1.1515	.3613
Opin 27	58	1.3276	.4734
Opin 28	60	1.0167	.1291
Opin 29	74	1.0270	.1633
Opin 30	74	1.0000	.0000
Opin 31	73	1.0411	.1999
Opin 32	74	1.0000	.0000
Opin 33	72	1.0139	.1179
Opin 34	73	1.0137	.1170

HIGH COMPLIANCE:

<u>Item</u>	<u>N</u>	<u>Mean</u>	<u>Standard Deviation</u>
Opin 1	20	1.0000	.0000
Opin 2	20	1.0000	.0000
Opin 3	20	1.0000	.0000
Opin 4	20	1.0500	.2236
Opin 5	20	1.4500	.5104
Opin 6	19	1.0526	.2294
Opin 7	19	1.4211	.5073
Opin 8	20	1.0000	.0000
Opin 9	20	1.0500	.2236
Opin 10	20	1.0000	.0000
Opin 11	20	1.0000	.0000
Opin 12	17	1.1176	.3321
Opin 13	20	1.0500	.2236
Opin 14	19	1.0526	.2294
Opin 15	19	1.0526	.2294
Opin 16	20	1.2000	.4104
Opin 17	18	1.1111	.3234
Opin 18	16	1.1875	.4031
Opin 19	20	1.0000	.0000
Opin 20	19	1.0526	.2294
Opin 21	15	1.5333	.5164
Opin 22	18	1.0556	.2357
Opin 23	17	1.2941	.4697
Opin 24	20	1.3000	.4702
Opin 25	20	1.0000	.0000
Opin 26	20	1.1000	.3078
Opin 27	17	1.3529	.4926
Opin 28	18	1.0000	.0000
Opin 29	20	1.0000	.0000
Opin 30	20	1.0000	.0000
Opin 31	20	1.0000	.0000
Opin 32	20	1.0500	.2236
Opin 33	20	1.0000	.0000
Opin 34	19	1.0000	.0000

APPENDIX O
Correct Responses of Principals by
Compliance Categories

Correct Responses of Principals by

Compliance Categories

Total correct responses of principals by compliance categories, of the knowledge of P.L. 94-142 and Rules for Governing Programs and Services for Children with Special Needs Instrument for 140 public elementary and secondary principals.

<u>LEA ID</u>	<u>Low Compliance Scores N=45</u>	<u>LEA ID</u>	<u>Moderate Compliance Scores N=75</u>	<u>LEA ID</u>	<u>High Compliance Scores N=20</u>
1	22	5	31	9	31
1	25	5	30	9	27
1	24	5	26	9	33
1	24	5	29	9	27
1	32	5	27	9	31
1	25	5	22	10	24
1	27	5	29	10	29
1	33	5	27	10	32
1	23	5	28	10	30
1	23	5	27	10	32
2	26	5	24	11	23
2	30	5	27	11	30
2	28	5	27	11	33
2	24	5	27	11	29
2	23	5	26	12	25
2	29	5	18	12	26
2	26	5	29	12	24
2	26	5	26	12	30
3	24	5	23	12	29
3	26	5	24	12	30
3	33	5	26		
3	28	5	22		
3	22	5	32		
3	33	5	20		
3	28	5	25		
3	29	5	28		

Correct Responses of Principals by Compliance Categories continued

<u>LEA ID</u>	<u>Low Compliance Scores N=45</u>	<u>LEA ID</u>	<u>Moderate Compliance Scores N=75</u>	<u>LEA ID</u>	<u>High Compliance Scores N=20</u>
3	24	5	30		
3	33	5	22		
3	28	6	23		
3	24	6	22		
3	28	6	29		
4	26	6	30		
4	23	6	29		
4	30	6	29		
4	27	6	29		
4	26	6	30		
4	29	6	30		
4	17	6	31		
4	27	6	31		
4	21	6	27		
4	28	6	28		
4	26	7	17		
4	29	7	33		
4	29	7	25		
4	24	7	25		
		7	32		
		7	24		
		7	31		
		7	32		
		7	30		
		7	24		
		7	32		
		7	30		
		7	31		
		7	33		
		7	29		

Correct Responses of Principals by Compliance Categories continued

<u>LEA ID</u>	<u>Low Compliance Scores N=45</u>	<u>LEA ID</u>	<u>Moderate Compliance Scores N=75</u>	<u>LEA ID</u>	<u>High Compliance Scores N=20</u>
		8	25		
		8	27		
		8	31		
		8	22		
		8	24		
		8	29		
		8	27		
		8	30		
		8	30		
		8	26		
		8	26		
		8	32		
		8	25		
		8	31		
		8	29		
		8	30		
		8	29		
		8	26		
		8	30		

 $\bar{x} = 24.2$ $\bar{x} = 28$ $\bar{x} = 29$

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