

# **RECRUITMENT AND ENROLLMENT**

## **Intermediate School District as Fiscal Agent**

Intermediate School Districts (ISDs) and consortia of ISDs are the awardees of Strong Beginnings funding. ISDs may be approved to directly administer Strong Beginnings classrooms or develop agreements with eligible program providers. Eligible program providers are: school districts, public school academies and public or private, non-profit, or for-profit agencies.

Children who reside within the service boundaries of the ISD can be enrolled by any program provider. However, it is suggested that each ISD and its program providers within the ISD form an agreement regulating the enrollment of 3-year-old children across program provider boundaries. This may prevent competition among program providers. If the family moves after the child has enrolled, the program may continue to serve the child for the remainder of the program year, with the family providing transportation.

**Three-year-old children may not be enrolled across ISD boundaries for enrollment in Strong Beginnings.** If a family lives within the boundaries of a school district served by the ISD, they are eligible for Strong Beginnings programs provided by that ISD. If the family does not live within the service boundaries of a school district served by the ISD, they are not eligible for Strong Beginnings programs provided by that ISD even if the ISD is located within their county of residence. Any exceptions to this policy must be approved by the Implementation Consultant at Clinton County Regional Educational Service Agency (CCRESA).

## **Interagency Collaboration**

Strong Beginnings and Head Start programs in Michigan are required to collaborate in preschool recruitment and enrollment activities. Best practice is to utilize one preschool application for all state and federally-funded programs and share one waiting list. The local Great Start Collaborative could be asked to facilitate this work to ensure that as many of the community's children as possible take part in a program. If a program enrolls a child who is eligible for or dually-enrolled in an additional funded preschool program, it prohibits another child from participating in Strong Beginnings who may only be eligible for Strong Beginnings. Refer to resources for this section on collaboration.

## **Guidelines for Developing a Recruitment, Referral, and Enrollment Protocol**

Although Strong Beginnings and Head Start are designed to serve two different populations of children/families, both programs share a common goal: to ensure as many at-risk children as possible benefit from high-quality preschool programs. Therefore, each school readiness advisory committee must approve a collaborative recruitment and enrollment process to assist parents in selecting the program best

suited to their needs. A signed collaborative agreement includes the process and procedures, including timelines, for recruitment and enrollment. The ISD monitors to see that the procedures are followed by program provider staff.

While each region will create a protocol that is unique to area needs and resources, a strong recruitment, referral, and enrollment protocol will include specific items:

- Contact information for each program including name of person(s) having responsibility for recruitment, title(s), telephone number(s), e-mail address(s), and preferred mode of communication;
- Eligibility guidelines for each program including age(s) of children served;
- Recruitment and enrollment policies that allow families to learn about each program for which their children are eligible;
- Processes and timelines for mutual referrals among all available programs; and
- Appropriate signatures.

A protocol exhibiting best practice will include a common application. The common application should collect the required information from parents/guardians of each child for later verification of eligibility. In cases of single, separated, or divorced families, access to personal data provided to determine eligibility (e.g. tax forms, pay stubs, etc.) should be restricted to only the parent that provided that data. See the ISD Administration section of this manual for additional information on maintaining and protecting child files and eligibility information. Programs may want to consider including a question on the application regarding permissions for discussing the application with others. Enrollment applications should collect:

- Age of child;
- School district/county of residence;
- Annual income;
- Potential program eligibility factors placing the child at risk of educational failure;
- Health information and proof of immunizations; and
- Parent permission to share information among programs to determine proper placement.
- Screening for Basic Needs

## **Recruitment**

A well-developed plan for recruiting the children most at risk of school failure is essential. The local Strong Beginnings/GSRP family participation group and the ISD School Readiness Advisory Committee should be involved in drafting the plan.

Efforts to connect with families might include:

- Information given to home visit specialists through the ISD and community mental health agencies;

- Posters displayed at local health departments, doctors' offices, libraries, post offices, hospitals, and businesses that draw young families such as laundromats, and grocery stores;
- Flyers sent home with children enrolled in elementary school;
- Informational articles in the local newspaper;
- Door to door census;
- Recruitment tables at local area fairs and festivals;
- Electronic community bulletin boards;
- Information on local cable stations;
- Displays at kindergarten orientation; and
- Connecting with local *Early On*® and home visiting programs.

During the Strong Beginnings Pilot, ISDs in collaboration with programs providing Strong Beginnings may determine if it is best to recruit children for Strong Beginnings on an ISD wide basis or just in the geographical areas where programs exist.

## Referral of Head Start-Eligible Children

Strong Beginnings requires specific collaboration when a child is eligible for Head Start. **An eligible child must be referred to Head Start** before beginning Strong Beginnings. If a child who is eligible for Head Start attended Strong Beginnings and the family wishes the child to be enrolled in GSRP, they do not need to be referred to Head Start for a second time. The referral process within the protocol must identify which program is responsible for contacting families to inform them of the eligibility for Head Start. Once parents are aware of the eligibility, Head Start should contact the family to describe the services available. Families should be guided to make the program choice best suited to their needs. See the Office of Great Start memorandum on family choice in the resources for this section.

The Head Start program should follow-up with the referring Strong Beginnings program regarding the parents' decisions. It is not recommended that families be responsible for the completion of a referral form and/or returning a referral form to Strong Beginnings.

A referral form from Strong Beginnings to Head Start should include:

- Date of referral, date forwarded to Head Start, and date received by Head Start;
- Family contact information: parent and child names, mailing address, phone number, e-mail address;
- Signatures of sending and receiving program representatives;
- Program placement decision;
- Explanation of family program preference (preferably written by parent);
- Parent signature acknowledging parental choice and repercussions of the decision i.e., if choosing Strong Beginnings, their child will be included on a

Strong Beginnings waiting list until the referral process with Head Start is completed;

- Date returned to Strong Beginnings; and
- Signature of Head Start representative.

Strong Beginnings enrollment is deferred while the referral to Head Start is completed. The completed referral form is documentation that agreed-upon procedures have been followed and also reports the placement outcome for each family that has been referred. The completed referral may document acknowledgement from program representatives and parents that the family is income-eligible for one program and will be enrolled in another. If Head Start does not return the referral form, the Strong Beginnings program providers need only retain on file the original dated referral form to meet program requirements.

The protocol should detail the referral turn-around time frame before a family is removed from the Strong Beginnings waiting list. Then, as openings occur, all the children on the list are considered so that the family with the greatest need according to the Participant Eligibility and Prioritization Guidelines is contacted first. This critical portion of written protocol helps to ensure common understanding among programs and service to the highest number of eligible children/families.

## **Head Start Referrals to Strong Beginnings**

In addition, a protocol that formalizes a strong collaborative relationship among partners will document the Head Start program's steps for referring both applicants that do not qualify for Head Start and qualifying families on Head Start's waiting list to Strong Beginnings. Section 642(e) of the Head Start Act of 2007 details Head Start's requirements for collaborating with state-funded preschool programs. Refer to *Authorization for Requirement to Collaborate* in the resources for this section for select sections of the Head Start Act of 2007.

## **Considering Child and Family Additional Needs**

When reviewing applications and considering children for enrollment, several aspects of child and family need and preference should be considered, including:

### **Wrap around care:**

As part of the local coordinated recruitment and enrollment process, families should be asked if they have a need for wrap around care. Families identifying such a need must be made aware of, and referred to, Strong Beginnings programs that provide before and after school care and summer programming for three-year-old children and their siblings. Within their identified income bracket, families needing wrap around care should receive enrollment priority within programs that offer these services.

No fees may be charged to apply for or become enrolled in or during the Strong Beginnings programming. For those programs that offer additional service hours (before/after Strong Beginnings hours, Friday care, holiday care, summer

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programming), tuition may be charged to families for the programming beyond Strong Beginnings hours.

Programs that have currently enrolled children that will be transitioning to their Strong Beginnings classroom, may have a prioritization policy to enroll their currently enrolled income eligible children before any new families are enrolled in their program.

### **CDC scholarships:**

Programs offering supplementary tuition-based hours of care must be encouraged to accept CDC scholarships for families with incomes up to 200% of FPL. It is acceptable for programs to receive CDC scholarship funds and/or charge tuition for children enrolled in care before/after Strong Beginnings hours, Friday care, holiday care, and summer programming.

Programs that have currently enrolled children receiving a CDC scholarship and are transitioning to the Strong Beginnings classroom, no additional income verification is needed. Documenting the family's approval for the CDC scholarship eligibility is sufficient.

Families falling below 200% FPL, needing supplemental care for their three-year-old or other children in the family and not receiving CDC scholarships should be referred and encouraged to apply.

### **Head Start:**

Head Start programs may follow their own grantee enrollment policy and prioritize the enrollment of currently enrolled Head Start children transitioning into grantee Strong Beginnings classrooms ahead of enrolling any new children to the program.

### **Transportation:**

Families needing transportation services must be made aware of and referred to programs that provide transportation to and from their program. Every effort should be made to enroll families needing transportation in programs offering these services.

### **Developmental delays or diagnosed disabilities:**

Throughout the application and enrollment process, please refer to the subsection on special education eligible children within this section and the child assessment section for guidance when a child is identified as possibly experiencing developmental delays. Programs should not wait until the child is enrolled and/or attending to facilitate the referral with the family. ISDs must have a documented policy addressing both the enrollment process for children with IEPs in Strong Beginnings classrooms and guidance for ensuring best practices for inclusion classrooms. Those children that have IEPs recommending a placement in a general education setting must be given priority within this lowest bracket. Actual family

income must also be collected and reported in Michigan Student Data System (MSDS).

### **Homelessness or foster care:**

Any child experiencing homelessness or foster care must be given priority within this lowest income bracket. Please refer to the eligibility section for more information.

### **Early entry children:**

Priority for enrollment must be given to three-year-old children, regardless of income, before enrolling children with birthdates after September 1. Children who will turn three September 2-December 1 of the current year, may be enrolled if all eligible three-year-old children have been enrolled, there are no children on the waiting list, and there are additional vacancies within Strong Beginnings classrooms. The local prioritization process regarding income bracket and eligibility factors should also be applied to these children. ISDs must include in their policies timelines for enrolling children who will turn three September 2-December 1 based on historical enrollment trends and generally wait until after September 1.

### **Enrollment**

The recruitment process for children attending Strong Beginnings may begin as early as January of the year in which attendance will begin. Prospective program providers are cautioned to delay enrollment until the ISD has received a letter from Clinton County RESA (CCRESA) stating their award will continue for the current school year. Parents may be told they are on a waiting list and if expected funding is maintained, will be formally considered for enrollment using the Strong Beginnings prioritization process once the funding of the program has been finalized. It is often best to have parents receive in writing and counter sign a letter indicating they understand that submitting an application does not mean they will be enrolled in the program and that the program does not admit children on a first come, first served basis. Please see the Eligibility section of this manual for information on child eligibility.

### **Basic Needs Evaluation**

All families completing enrollment forms for Strong Beginnings must be evaluated for basic needs such as food and housing. If families have immediate needs in any of these areas, the Family Liaison or other appropriate personnel must support the family in finding assistance to meet these needs even though the child has not yet been and may not be admitted to the program.

### **Prioritization**

Ninety percent of all children enrolled throughout an ISD or consortium of ISDs must qualify with family income under 250% of the Federal Poverty Level (FPL). CCRESA further requires that each applicant be ranked by family's FPL and that

programs enroll children with families with the lowest income first following these procedures:

1. As Strong Beginnings preschool applications, including income level and other program eligibility factors, are collected, each family's Federal Poverty Level (FPL) is calculated. Follow current guidelines in the [Eligibility](#) section of the Strong Beginnings Pilot Implementation Manual to calculate the family's income. Poverty level calculators are available online and may be helpful, such as this [Federal Poverty Level Calculator](#). The family income, family size, and exact FPL must be recorded in each child's file, preferably on the enrollment form. The FPL for each child will be reported to the MSU research team.
2. Each child is then placed on a list of applicants from lowest to highest family poverty level. Children whose families are at the same poverty level should be ranked according to other collected program eligibility factors. Any children who are homeless or in the foster care system or who have an individualized education program (IEP) recommending placement in an inclusive preschool setting must be considered to be in the zero to 50% of FPL quintile. This, along with additional program eligibility factors must be considered when prioritizing children for enrollment. The actual FPL for a family with a child with an IEP will be reported to the MSU research team while children qualifying because of a foster care placement or homelessness will be reported within the 0 – 50% FPL quintile. All other program eligibility factors will also be collected and reported to the MSU research team for every child.
3. Any child who attended Strong Beginnings is automatically eligible for placement in GSRP. The family does not need to requalify financially and the child will be admitted to GSRP even if there are other eligible applicants with a lower FPL.
4. Any child eligible for Head Start by income or other factors is referred to Head Start by Strong Beginnings following local written protocols, in compliance with the Implementation Manual. The process must be complete before enrolling any Head Start eligible child in Strong Beginnings.
5. Once the award letter is received, the ISD notifies each program provider regarding the award and when enrollment may begin, according to local policy. Enrollment must begin with children from families between zero and 50% of FPL (who have completed the Head Start referral process) and continue with children from families between 51 and 100% of FPL (who have completed the Head Start referral process), between 101 and 150%, between 151 to 200%, and between 201 and 250%.
6. Since families with the most needs often wait until the beginning of the school year to apply to Strong Beginnings, programs must save 10% of their spots (2 spots per classroom) for children from families below 150% FPL who are late to apply until at least the Friday after Labor Day. After this date

children from families above 150% poverty may be given these final two spaces. If there are enough applications from families with incomes below 150% FPL to entirely fill the classroom, no spaces need to be saved.

7. Children who will turn three between September 2 and December 1 of the program year are considered Early Entrants to Strong Beginnings. They may not be considered for enrollment until after September 1 of the program year and may only be considered if there are no children of the appropriate age with completed applications. A child who is already three will be admitted ahead of an early entrant even if the early entrant is from a lower FPL quintile prior to and on September 1. Only after September 1 is the early entrant prioritized along with other older children.
8. Finally, if the ISD determines after the Strong Beginnings program has started for the year that all eligible children are being served and that there are no children on the waiting list who live with families at or below 250% of FPL, the ISD may then enroll up to 10% of children who live with families with a household income above 250% of FPL with extreme risk for low educational achievement as determined by number or severity of existing Strong Beginnings program eligibility factors. Careful documentation of the program eligibility factors for these children must be kept in each child's file.  
**The Strong Beginnings Implementation Consultant at CCRESA must be advised that over-income children are being accepted into Strong Beginnings.** Refer to the *Participant Eligibility and Prioritization Guidelines* in the resources for this section for detail about the specific prioritization process required during the recruitment and enrollment process.

Each ISD must utilize a written prioritization process that provides clear direction for all Strong Beginnings staff. Based on the required income quintiles explained above, it may also include weighted priority for local considerations such as lead exposure. It should include impartial guidance for staff on situations where children present with similar income and program eligibility factors.

## Wait List

When all Strong Beginnings funded classroom openings are filled, each ISD must establish and maintain a waiting list of eligible children seeking placement when a space becomes available in a classroom. Eligibility of children on the waiting list must be verified and prioritization for possible enrollment determined as indicated in the Prioritization subsection above. Verification and prioritization of new applications remains a critical aspect of ensuring children with the greatest need are served first. Children on the waiting list are enrolled as space becomes available. In addition to children who are enrolled in Strong Beginnings, each ISD will obtain unique identification codes (UICs) for children on the waiting list for Strong Beginnings. Requested information on waiting list children including UICs, will not be entered into MSDS but will be submitted to the Strong Beginnings MSU research team as requested.



## **Unique Enrollment Situations**

Occasionally families with unique situations apply for enrollment in Strong Beginnings. When a child's parents are separated, special considerations must be made when calculating the FPL; the Eligibility section of this manual addresses methods to use based on the specifics of the situation. Enrollment decisions may also be affected when the child spends time with each parent. If parents disagree about the enrollment or if one is unable to transport the child to a mutually agreeable program, program staff are encouraged to work with both parents to support a decision in the best interest of the child. In no case may a child be enrolled in two Strong Beginnings classrooms at one time or enrolled in one classroom on a part-time basis.

Additionally, each year some families will move. When a move is made to a nearby location, even if outside district boundaries, a child may remain in the current program as long as transportation can be arranged. When a family moves farther, every effort should be made to assist the family to enroll in another program based on the availability of space and funding and on the appropriate prioritization of families on the waiting list, if any. This includes the transfer of the Strong Beginnings application, enrollment file, and screening and assessment data. A family moving to a new program should not be required to complete duplicate enrollment paperwork for eligibility determination. A child found eligible at any point during the program year remains eligible for the remainder of the year as well as for the following year in GSRP.

## **Combining Eligible and Non-Eligible Children in Preschool Classrooms**

Only children fully funded by Strong Beginnings for classroom participation may be enrolled in Strong Beginnings classrooms. No braided or blended programs are allowed.

## **Special Education Eligible Children**

A child of any income level with an Individualized Education Plan (IEP) may be placed in a Strong Beginnings classroom through the Strong Beginnings recruitment, prioritization, and enrollment process only if they have a Qualifying IEP as defined below.

As stated earlier in this Section, each ISD must utilize a written prioritization process that provides clear direction for all Strong Beginnings staff. This must be based on the required income quintiles as explained above but may also include weighted priority for special cases such as the enrollment of children with IEPs. Strong Beginnings policy states that "all age-eligible children ... who have individualized education programs recommending placement in an inclusive preschool setting are considered to live with families with household income equal to or less than 250% of the federal poverty guidelines regardless of actual family

income and are prioritized for enrollment within the lowest quintile.” By applying this requirement to indicate a recommendation for an inclusive preschool setting on an individual basis, an Individualized Education Plan (IEP) Team creates a “Qualifying IEP” that allows Strong Beginnings to prioritize children based on need versus income only.

## Federal Guidance on Inclusive Preschool Settings

In a [Dear Colleague Letter](#), the U.S. Department of Education Office of Special Education Programs (OSEP) provides this definition: *“Inclusion in early childhood programs refers to including children with disabilities in early childhood programs, together with their peers without disabilities; holding high expectations and intentionally promoting participation in all learning and social activities, facilitated by individualized accommodations; and using evidence-based services and supports to foster their development (cognitive, language, communication, physical, behavioral, and social-emotional), friendships with peers, and sense of belonging.”*

The [United States Dept of Education Colleague Letter](#) further distinguishes inclusive practices as those delivered *“in the child’s classroom in the course of daily activities and routines in which all children in the classroom participate (e.g., ‘circle time’, ‘learning centers’).”* While *“services delivered in other locations that remove the child from the opportunity to interact with nondisabled children would not be considered as being received in the Regular Early Childhood Program. These include, but are not limited to, services delivered in a 1:1 therapeutic setting, or in a small group comprised solely of children with disabilities in another location within the building where the regular early childhood program is located”* (e.g., speech or physical therapy delivered via a time-restricted session two- or three-times weekly).

Additionally, in the Dear Colleague Letter referenced above, OSEP states, *“in determining the educational placement of a child with a disability, including a preschool child with a disability, the public agency must ensure that each child’s placement decision is made by a group of persons, including the parents, and other persons knowledgeable about the child, the meaning of the evaluation data, and the placement options...”*

## Qualifying IEPs

For an IEP to be considered a Qualifying IEP for Strong Beginnings, it must include a recommendation from the IEP Team that the child be placed **in an inclusive preschool setting**. An IEP that includes this language qualifies the child for Strong Beginnings regardless of income and allows the ISD to prioritize enrollment within the lowest quintile *but does not guarantee placement in Strong Beginnings*. Strong Beginnings is often an ideal inclusive general education placement for children with special needs. The intent of this provision is to create placement opportunities for children with IEPs within high-quality inclusive settings. As with all children, the family must complete an application for Strong Beginnings and the collaborative

enrollment and prioritization processes must be followed, including referral to Head Start.

Strong Beginnings is first and foremost a targeted program for income eligible children at risk for low educational attainment. The system *is not capable of accommodating every child with an IEP regardless of the complexity of the child's special education needs*. Strong Beginnings and special education staff must work closely together to evaluate each child's strengths and needs alongside the family's available resources and supports.

## **ISD Prioritization of Children with IEPs**

**The enrollment process must consider income and risk factors, such that children determined with higher need are enrolled before children with lesser need.** *For purposes of this subdivision...all age-eligible children served in foster care or who are experiencing homelessness or who have individualized education programs recommending placement in an inclusive preschool setting are considered to live with families with household income equal to or less than 250% of the federal poverty guidelines regardless of actual family income and are prioritized for enrollment within the lowest quintile.*

A written recommendation within an IEP for placement in an inclusive preschool qualifies a child for Strong Beginnings but does not guarantee placement within a Strong Beginnings classroom. The appropriate inclusive preschool placement for a child with an IEP may be Strong Beginnings, or could be one of several other program setting types including district run tuition preschool, Head Start, public school academy, or center- or home-based licensed child care. The IEP, as a document, is just one aspect of the process and does not establish guaranteed enrollment in Strong Beginnings. The IEP, an application for Strong Beginnings, and any additional available information must be considered within the Strong Beginnings prioritization process.

It is incumbent upon the ISD administrators to develop a process for determining Strong Beginnings eligibility for children with IEPs. It is imperative that the process is effective for both Strong Beginnings and special education at the ISD and local levels. The ISD can ensure the process is achievable and clear to all involved by including the ECC and ISD special education leaders, special education partners in local districts, Strong Beginnings subcontractor administrators, families, and community advisors in creating or reviewing the process. The written process must include criteria for evaluating, through review of the IEP and Strong Beginnings application, each child's prioritization for enrollment. A sample placement rubric is available within the Resources for this section.

The prioritization process must be closely tied to a process for determining the placement for any child with an IEP. **The ISD must ensure that the placement in Strong Beginnings includes a detailed plan for a child with an IEP to receive all of the special education and related services and supplementary**

**aids and services included in the child’s IEP in order to meet the needs of the particular child.** It must also assure that the inclusive setting has policies and practices that enable the child’s full participation and success.

Finally, the ISD must monitor carefully the number of children with Qualifying IEPs placed in each GSRP classroom to ensure successful inclusive programming. Individual classroom needs and resources must be taken into consideration, such as the variety and degree of disability as well as adult/child ratio in a classroom. [The Policy Statement on Inclusion of Children with Disabilities in Early Childhood Programs](#) from OSEP recommends inclusive classrooms limit the proportion of children with IEPs to no more than one-third of enrollment. Generally, it is recommended that children with IEPs make up only 25 percent of planned enrollment in each classroom to accommodate the possibility other children may be identified with special needs after enrollment. **Due to the research requirements in pilot Strong Beginnings classrooms, however, no more than 10 percent of planned enrollment in each classroom, or one child, may be admitted with a Qualifying IEP. For each two classrooms of Strong Beginnings operated by an ISD, however, one of the classrooms may have a second child with a Qualifying IEP.**

## Placement Considerations

When considering placement for a child with a diagnosed disability, the [Individuals with Disabilities Education Act](#) (IDEA) regulations and the [Michigan Administrative Rules for Special Education](#) (MARSE) must be followed. These rules and regulations do not supersede either the Strong Beginnings recruitment, prioritization, and enrollment requirements or the Head Start program standards for [Eligibility, Recruitment, Selection, Enrollment, and Attendance](#) (ERSEA). However, a child with an IEP does have rights under IDEA. Consider this excerpt from *The Law and Special Education* by Mitchell Yell:

- A student with disabilities has the right to be educated with students in the general education environment. The general education environment is considered the least restrictive setting because it is the placement in which there is the greatest measure of opportunity for proximity and communication with the “ordinary flow” of students in schools.
- The less a placement resembles the general education environment, the more restrictive it is considered. Specifically, a student with disabilities has the right to be educated in a setting that is not overly restrictive considering what is appropriate for that student. Appropriateness entails an education that will provide meaningful benefit for the student. When the educational program is appropriate, a student with disabilities should be placed in the general education environment, or as close to it as is feasible, so long as the appropriate program can be provided in that setting.
- Although placement in the general education classroom may be the least restrictive environment (LRE) for some students with disabilities, it is not

required in all cases. The IDEA requires inclusion when the general education classroom setting can provide an appropriate placement.

- The IDEA requires that, when appropriate, students with disabilities be educated in settings with children without disabilities. The law provides that: to the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities are educated with children who are not disabled, and that special classes, special schooling, or other removal of children with disabilities from the regular educational environment occurs only when the nature or severity of the disabilities is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily (IDEA, 20 U.S.C. 14129a)(5)(A)).
- There are two parts to the LRE requirement of the IDEA. The first addresses the presumptive right of all students with disabilities to be educated with students without disabilities. Schools must make good-faith efforts to place and maintain students in less restrictive settings. This presumptive right, however, is rebuttable; that is, the principle sets for a general rule of conduct (i.e. integration) but allows it to be rebutted when integration is not appropriate for the student.
- There are three major placement errors that IEP teams need to avoid. First, placement decisions should not be based solely on factors that are unrelated to a student's actual needs. Examples of such factors include determining a student's placement based on a student's category of disability, the severity of a student's disability, the availability of services, or administrative convenience. Second, a student's placement must not be predetermined. Predetermination of placement occurs when an IEP team decides on a student's placement prior to the actual IEP meeting. This does not mean that the IEP team members cannot come to the meeting with opinions and even a draft IEP, but that a final placement decision cannot be made until the parents are present and meaningfully involved in that decision. Third, an IEP team should not determine a student's placement prior to developing his or her IEP. The federal regulations to the IDEA require that a student's placement "must be based on the child's IEP" (IDEA Regulations, 34 C.F.R. 300.116[b]).

These rules and regulations are complicated because there is not a universal inclusive opportunity for all children in preschool, as there is for children in Kindergarten through 12<sup>th</sup> grade. **To best meet all applicable rules and regulations, either a Strong Beginnings or a Head Start representative, or both, should be included in the IEP team meeting immediately preceding possible placement in an inclusive preschool setting.**

The IEP process should carefully consider all of the following prior to completing an IEP for a preschool-age child.

- Do all parties feel that the IEP fully meets the child's needs?
- Does the IEP include a recommendation from the IEP team that the child be placed in an inclusive preschool setting?
- What is the status of the enrollment process for Head Start and/or Strong Beginnings for the recommended timeline for the child to enter an inclusive preschool, i.e.: are there current openings, are applications being processed and prioritized?
- Can the child's needs for special services be met in the context of Strong Beginnings?
- Does the plan ensure the child will receive all of the special education and related services and supplementary aids and services included in the child's IEP?
- What additional support or accommodations will be necessary so the child can successfully participate fully in the activities and environment of Strong Beginnings?
- How will special education services be delivered? Best practice for inclusive programming sees services "pushed in" to the regular education setting as indicated by OSEP.
- Are ongoing consultation meetings between special education staff and the Strong Beginnings teaching team planned? How will the Strong Beginnings teaching team be supported with appropriate planning, instruction, assessment, and program implementation including needed accommodations to the daily routine, behavior challenges, and parent communication when special education staff are not present?

No child may be enrolled in part-day Strong Beginnings and part-day ECSE.