

VENTURA COUNTY SELPA INSTRUCTIONS

Items highlighted in blue are new for 2010-2011.

I. PRE- IEP MEETING FORMS

A. Assessment Plan

Must be presented to parent within 15 days of receipt of referral, unless the district declines to assess. Reasons for declining might be: no areas of suspected disability, no evidence of problems at school, recent assessment conducted did not support eligibility, etc. If the district declines to assess, it must inform the parent, in writing, citing the reason, within 15 days of referral. (See CFR section 300.503)

The Assessment Plan should note reason for assessment/concern. For initial referrals only, specify name of person referring (may be SST) and date of referral. Also, for initial referrals, specify the school years that the student received intervention prior to referral (may be up to two). If none, specify. For students referred in previous years but not found eligible who are being referred again, use current referral information.

Check the boxes for all areas to be assessed. Check at least one box (or put "other") and indicate discipline of assessor. Parent/Adult Student Rights must be attached.

The box regarding LEA Medi-Cal billing gives parents the option to indicate if they do/do not give permission for the school district to request reimbursement for this assessment from the LEA MediCal billing option program. If parents do not check either box, Medi-Cal may not be billed. If parents have questions about this, explain that the federal Medicaid program allows school districts and county offices of education to apply for reimbursement for certain health-related services which are provided to eligible children within the school environment. Any income from this program may be used by the district to offset costs of providing special education services. The district may only bill Medi-Cal for assessment with specific permission from the parents. Explain to parents that it will not affect their child's individual benefits.

B. Assessment Plan Memo for Private School Students

This memo may be used to clarify the reason a service provider is receiving an Assessment Plan for a student not currently enrolled in their school.

C. Designation of Educational Representative

Used for parent or adult student to designate an educational representative on a long-term basis. The bottom of the IEP meeting notice may be used to designate representative for one IEP meeting only.

D. Excusal of IEP Team Member

IDEA 2004 allows a parent and the district to agree in writing that attendance of a required IEP team member's discipline is not necessary when the member's area of the curriculum or related service is not a topic of the meeting, or when the member's area is a topic and the member submits input in writing. Use of the Excusal Form is optional if another IEP team member with the same qualifications is available to attend.

The written consent of the parent must be obtained *prior* to excusing a team member from all or part of an IEP meeting. The excusal can apply to a general education teacher when an IEP is reviewed or

revised, but not recommended for an initial IEP. This form can also be used for the general education teacher when the student is enrolled in an NPS.

Either the parent or the district may deny a required team member's request to be excused from an IEP meeting.

1. Complete student identification information and date that Excusal form was submitted to parent.
2. Complete information regarding the IEP meeting that the required team member is to be excused from and identify the IEP team member being excused.
3. Check the applicable.
4. Make any comments, if appropriate. Comments might include rationale for how the area will be addressed by other staff; or that the written input will be reviewed with the parent at another time.
5. Identify the name, title and phone number of the person the parent should contact if they have questions about the form or about the area of the curriculum of the excused IEP team member.

E. Extended School Year Consideration

This form may be used to help the team decide if Extended School Year (ESY) is appropriate. Please note that all, if not most, students lose some knowledge or skills during a school break, but most students, including students with disabilities, are able to recoup these skills within a reasonable time frame upon his/her return to school. The student is entitled to an ESY program if the IEP team determines:

- 1) The student has a disability that is likely to continue indefinitely or for a prolonged period.
- 2) Interruption of the student's educational programming may cause serious regression when coupled with limited recoupment capacity; and
- 3) It is impossible or unlikely the student will attain the level of self-sufficiency and independence that would otherwise be expected in view of his/her disability

When completing this checklist, please review and consider information from the following:

- 1) IEP team members (e.g. parents, teachers, service providers and assessors) and private providers and assessors (e.g. non-public and private providers);
- 2) Existing data such as how the student regressed and recouped skills from previous breaks, previous IEPs, progress towards goals and objectives, observations, assessment reports, test results, progress reports, report cards, work samples, behavior logs, expert opinions, medical and other agency or private reports and information; and
- 3) Predictive data in terms of whether the student is likely to regress and how long it may take him/her to recoup lost knowledge and/or skills.

It is also important to consider all educational skills (e.g. academic, vocational, social, emotional, and/or behavioral), medical and other information such as the level and type of family or private support a student receives during a break.

F. Family Interview Worksheet

This form is to be used in preparation for an IEP of a student with significant disabilities. The meeting with the family can be held over the phone or in person, but is best when conducted in the home. The information should be used in developing goals and services on the IEP. It can be particularly useful information in preparing for the transition to adult life.

G. Home Language Survey

Included for your information only. Obtain copies from your district.

H. IEP Team Meeting Notices

1. Notice of IEP Team Meeting

Check at least one meeting purpose. (All students who will turn 16 prior to the next IEP should also have "Transition" checked.) Check the boxes to indicate who was notified of the meeting and the name of the individual expected to attend. If transition will be discussed, the district is responsible to invite any adult service providers whose input may be needed to develop transition activities.

CCS or Mental Health must be invited, and must attend if they will be providing educational services via the IEP.

If the student is a client of regional center, the regional center service coordinator should be invited, unless parents have indicated otherwise. Agencies which will assist the student with transition must also be invited, and others as appropriate. **Use the Request for Agency Input form to request input from agency representatives who are not able to attend the meeting.**

If the student is transitioning from the Early Start Program, the parent may request the Early Start service coordinator be invited. Forward copy of the invitation or call the person indicated by the parent on the form.

If the parent (or adult student) objects to any outside agency representative, that person shall not attend. Parent/Adult Student Rights do not have to be sent with this notice, but must be provided annually.

If the student is transition age (15 or older), check the box at the bottom indicating that the student received a copy of this notice, unless you use the separate Notice to Transition Aged Student (see below).

2. Notice to Transition Aged Student of IEP Team Meeting

This form may be used in addition to the regular IEP Team meeting notice to specifically invite the transition aged student to the IEP meeting. The parent should still receive the regular Notice of IEP Team Meeting, even if the student is over 18.

3. Request for Adult Agency Input in the Development of Transition Services for the IEP

This is an important form to notify any potential adult agencies who might be providing services to the transition aged student of the upcoming IEP meeting. In considering whom to invite think about any potential agencies that might provide services to the student during the transition to adult life and after exiting public school. For specific names of local contact people, see page 3 of the Exit Summary which is updated regularly by the SELPA on their website. Click on Transition to Adult Life, then Adult Services Agencies, and scroll to the bottom for publications. It is your responsibility to monitor responses from each potential adult services agency. If they indicate they are unable to attend the IEP, you must ensure that they participate in an alternative way. They can participate by conference call during the meeting or you could call and record their input prior to the meeting. Written input may be in the form of a fact sheet or brochure that they sent to you regarding services or the person may jot down their input and fax or email it back to you. Be sure to bring all copies of the written input to share and attach to the IEP.

4. Staff Notice of IEP Team Meeting

To be sent to all staff invited to attend. Don't forget at least one general education teacher, even for preschoolers.

I. Interdistrict Referral

1. Referral Form - Fill out when a referral to another district is warranted for special education services, within SELPA. (Not outside SELPA)

2. Consent for Release of Information for Interdistrict Referral must accompany the Interdistrict Referral form.

J. Notice of Referral

Notice of Referral – This form is to be filled out and sent to the parents immediately upon request for referral from parents, other outside parties, and the SST.

If the district is not sure whether or not they will assess, check the top box and sign the bottom and send to the parents. Within 15 days of the request, you need to take action by sending an Assessment Plan or Notice to Parent of Action giving reasons why the district will not assess. If you send the Assessment Plan at the end of the fifteen days, you also need to send the Notice of Referral again, this time with the second box checked and the element of Notice completed on the bottom half of the form.

If the district has already made the decision to assess, then the second box can be checked right away, and the elements of Notice filled out on the bottom half of the form.

K. Notification of Age of Majority

Separate notices should be sent to parents and student on the student's eighteenth birthday, with procedural safeguards (Parent/Adult Student Rights) attached, sample letters are included. Include a copy of the "Designation of Educational Representative" form for the student. From then on, you must send separate notice of IEP meetings to both parents and student.

L. Parent/Adult Student Rights

Parents of children with disabilities must be given a copy of their rights (Procedural Safeguards) at least one time per school year, as well as:

- Upon initial referral or parent request for evaluation
- Upon receipt of the first state complaint in the school year
- Upon receipt of the first Due Process complaint in the school year
- If the student is being considered for suspension for more than ten days, or for expulsion
- Upon request by parent

There are three versions of the rights, full, abbreviated and Adult Student. The abbreviated version meets the requirements of the law and is satisfactory for annual notice. The full version contains much more detail which may be of interest to parents only under certain circumstances. The Adult Student version is more simple. If any parent requests a copy of the full version, they shall be given it. There is a version of both in English as well as Spanish. If the parent needs their rights in any other language, check the SELPA website for versions in other languages.

M. Parent Contact Log

Documents your attempt to contact parents to attend an IEP meeting or get an Assessment Plan returned. After three unsuccessful attempts (one in writing, two by phone), you may hold the meeting without the parent's consent. Of course, parent signature is still required before implementing anything new on the IEP.

N. Prior Written Notice to Parent of Action

Use this form to notify parent when the district proposes a change or refuses a parent request, such as assessment or services. May be used to confirm offer made at an IEP meeting. Fill out fully, noting sources of data used to make decisions.

O. Reassessment Prior to Transition to Kindergarten

These guidelines will address the procedures for reassessing children served with Special Education preschool services who are transitioning to kindergarten. Early intervention programs are designed to promote substantial gains in children, therefore, a reassessment prior to entering kindergarten must be conducted to assess the child's continuing need for Special Education services.

Ed Code 56445 (a) states: "Prior to transitioning an individual with exceptional needs from a preschool program to kindergarten, or first grade as the case may be, an appropriate reassessment of the individual shall be conducted pursuant to (Section 56320) to determine if the individual is in need of Special Education services."

Section 56320 states "The pupil is assessed in all areas of suspected disability, including, if appropriate, health and development, vision, including low vision, hearing, motor abilities, language function, general intelligence, academic performance, communicative status, self-help, orientation and mobility skills, career and vocational abilities and interests, and social and emotional status."

Section 56320 also states that:

- assessors must be qualified, trained and knowledgeable,
- the assessment materials must not be racially, culturally, or sexually discriminatory,
- assessment must be provided in the pupil's native language or mode of communication,
- the language and form of the assessment must be selected to yield the most accurate information
- assessments must be valid and reliable,
- assessments must be tailored to assess specific areas of need and not merely a general intelligence quotient,
- assessments administered to students with impairments in the area of sensory, manual or speaking skills must accurately assess what they purport to assess, and not the impairment.

In addition, Section 56320 states "No single measure of assessment is used as the sole criterion for determining whether a pupil is an individual with exceptional needs or determining an appropriate educational program for the pupil."

Section 56344 (a) states: "An IEP required as a result of an assessment of a pupil shall be developed within a total time not to exceed 60 days."

Is this a review or a triennial? It will be a **triennial reevaluation**; at which the following triennial evaluation questions will be addressed:

- *Whether the pupil continues to have a disability*
- *The present levels of performance and educational needs of the pupil.*
- *Whether the pupil continues to need Special Education and related services.*
- *Whether any additions or modifications to the Special Education and related services are needed to enable the pupil to meet the measurable annual goals set out in the IEP of the pupil, and to participate, as appropriate, in the general education curriculum.*

How does this work? Between 3-6 months prior to a student transitioning out of Special Education preschool services, the members of the IEP team shall review the student's record to determine if *any new* assessment needs to be conducted to be able to determine if the student continues to need Special Education services (review) or to answer the triennial review questions (triennial reevaluation). Within 15 days of determining what is needed, an Assessment Plan will be developed, and given to the parent, noting the areas of assessment. Be sure that the assessment covers all areas of disability.

Does it have to be a “full” assessment? Assessment should be conducted to get the most pertinent data to answer the Triennial Reevaluation questions, in all areas of suspected disability. For example, a student with a speech and language impairment would be assessed in the area of speech or language function in which there are deficits, or the child with mental retardation would be assessed in the developmental areas of language, motor, self-help, or any other areas of delay.

Does a psychologist have to be part of the assessment team? Assessment must be conducted by qualified individuals. Ed Code 56320 (b)(3) states: “Individually administered tests of intellectual or emotional functioning shall be administered by a credentialed school psychologist.” A psychologist would only be part of the assessment team if the professional skills of a psychologist were needed, for example, in areas of general intelligence or social/emotional functioning. If these are not areas of disability or *suspected disability*, then a psychologist may not be part of the team.

Does the assessment have to be “formal” or standardized? The assessment must be sufficient to produce the data needed to answer the questions above. This data may be produced by observation, record review, parent interview, teacher data, progress reports, review and summary of other recent assessments, or other assessment and screening tools.

What if there is a recent assessment report in the file? If there is a recent assessment report, (within one year) that covers all areas of suspected disability, and can address all the questions above, then *new* assessment does not need to be conducted. However, an Assessment Plan will still be developed, and as part of the assessment, you will summarize that report, and add findings from classroom, progress reports, etc. Professionals who are qualified to conduct assessment in the particular areas will be responsible for reviewing the existing reports and developing the summary. If there is a recent assessment report in one area, but another area requires new assessment, then conduct new assessment in the area of need.

Is an IEP meeting needed? Yes, you have 60 days from receipt of the signed plan to conduct the assessment and hold an IEP team meeting. An Assessment Report must be developed, and presented at the meeting. Check “Triennial” as the reason for the meeting. As part of a triennial reevaluation, you must address eligibility as part of the meeting, develop new present levels and set a new triennial review date (three years from the date of the meeting.)

What is required in the Assessment Report? There are specific requirements from Ed Code Section 56327 for this report. To ensure inclusion of all of the required elements, use the **SELPA Preschool Transition to Kindergarten Assessment Report** (See *Report Forms Section*.)

Who is responsible for the Assessment Report? The law does not specify that any one discipline is responsible for the Report, therefore, districts and schools can decide who is responsible for pulling together the **Transition to Kindergarten Assessment Report**.

What if the parent does not respond to the Assessment Plan? If the district can demonstrate that it has taken reasonable measures to obtain parent permission (two attempts in writing, one by phone) then the assessment can be conducted without parent permission.

What if parents refuse to give consent for reassessment? If parents refuse permission, then the district may pursue Due Process procedures to obtain parent permission, however, the district does not violate its legal obligations if it declines to pursue assessment.

There is a sample letter which may be given to parents explaining the process of reassessment prior to entering kindergarten, as well as a checklist for making decisions about reassessment.

Special education preschool teachers should have a copy of the Ventura County SELPA **Preschool to Kindergarten Transition Assessment** which serves as a tool for assessing pre-academic, communication, and social-emotional development which can be summarized on the **Preschool to Kindergarten Transition Assessment Teacher Summary**. This assessment can be used as a source of data for the **Preschool to Kindergarten Transition Assessment Report**.

P. Special Circumstances Paraprofessional (SCPS) Forms

See *flowchart (Appendix I-A)* for process for the IEP team to consider whether or not extra paraprofessional support is needed for a student. Use forms SCPS 1-4 as needed. Additional information is available in the SELPA booklet "Special Circumstances Paraprofessionals." (located at www.venturacountyselpa.com/PublicationsAZ/tabid/1794/Default.aspx)

An **Assessment Plan** must be generated prior to conducting a SCPS Assessment. The results of the assessment must be written on the SELPA **Assessment Report - Need for Special Circumstances Paraprofessional Support** and presented at an IEP meeting. (See Report Forms Section).

Q. Surrogate Parent Forms

The LEA shall ensure that procedures are established and maintained for the assignment of an individual to act as a surrogate for the parents within 30 days upon referral of the child to an LEA for special education and related services or, in cases where the child already has a valid IEP, under the following circumstances: whenever the parents of the child are not known, the agency cannot, after reasonable efforts, locate the parents, or the child is a ward of the State and the parents have had their educational rights removed by a court of law use SP-1 and SP-2 to obtain this information

In some cases, the judge will have appointed an Educational Surrogate. In this case, the LEA would file a copy of the court order designating the surrogate in the student's cumulative file, and that person would assume the rights as "parent" on behalf of the child.

CA Ed Code Section 56065 stipulates that foster parents can serve as surrogates only for special education students whose biological parents:

- Have had their educational rights removed by a court of law
- Cannot be located

Foster parents are described as a person, relative caretaker, or nonrelative extended family member who has been licensed by the county department of social welfare or probation who has been designated by the court as a specific placement.

Foster Parents can serve as surrogates for the duration of the foster parent - foster child relationship. If the Foster Parent is willing to serve in this role the district must make a record using the form "Foster Parent Agreement to Represent Special Education Student." (SP-4) Foster Parents appointed as representatives will assume all rights of a "parent" in educational decision-making about their child, including approval for assessment, services, and review as well as initiation of due process or complaints.

In cases where there is a Foster Parent but the parents retain educational rights on behalf of the child, the Foster Parents may not be appointed by the LEA as a surrogate. However, if the parents wish to have the Foster Parent represent them at the IEP meeting they may use the “**Designation of Educational Representative**” form to allow this to occur.

If there is no foster parent willing to serve, the LEA shall select a relative caretaker, or court appointed special advocate, if any of these individuals exist and are willing and able to serve. (If the child is subsequently moved from the home of a relative caretaker who has been appointed as a surrogate parent, the LEA shall appoint another surrogate parent.) If none of these individuals are willing or able to act as a surrogate parent, the LEA shall select the surrogate parent of its choice. (SP-3)

The individual appointed by the LEA to act as a surrogate shall not be an employee of the State education agency, the LEA, or any other public or private agency that is involved in the education or care of the child. The surrogate shall have no interest that conflicts with the interest of the child he or she represents and shall have knowledge and skills that ensure adequate representation of the child.

An individual who would have a conflict of interest means a person having any interest that might restrict or bias his or her ability to advocate for all of the services required to ensure a free appropriate public education for the child with a disability. (SP-5) As far as practical, a surrogate parent should be culturally sensitive to his or her assigned child.

Except for individuals who have a conflict of interest in representing the child, individuals who may serve as surrogate parents include, but are not limited to, retired teachers, social workers, and probation officers who are not employees of a public agency involved in the education or care of the child. If a conflict of interest arises subsequent to the appointment of the surrogate parent, the LEA shall terminate the appointment and appoint another surrogate parent.

The surrogate parent shall serve as the child's parent and shall be able to exercise all rights relative to the child's education that a parent has as specified in the IDEA. A surrogate parent may represent a child with a disability in matters relating to identification, assessment, instructional planning and development, educational placement, reviewing and revising the Individualized Education Program, and in other matters relating to the provision of a free appropriate education to the individual. This representation shall include the provision of written consent to the IEP including nonemergency medical services, mental health treatment services and occupational or physical therapy services. The surrogate parent may sign any consent relating to IEP purposes.

A surrogate parent may represent the child until:

- 1.) The child no longer needs special education
- 2.) The minor reaches 18 years of age, unless the child chooses not to make educational decisions for himself (Use the “Designation of Education Representative” form), or is deemed by a court to be incompetent
- 3.) Another responsible adult is appointed to make educational decisions for the minor,
- 4.) Rights of the parent or guardian to make educational decisions for the minor are fully restored.

A surrogate parent shall not be appointed for a child who is a dependent or a ward of the court unless the court specifically limits the right of the parent or guardian to make educational decisions for the child or for a child who has reached the age of majority unless the child has been declared incompetent by a court of law.

See *flowchart (Appendix I-B)* and forms to use in the process of appointing a surrogate parent.

You may request an evaluation of the surrogate parent from the IEP team. (SP-6)

R. Three Year Old Transition

A Transition IFSP meeting must be held between 2 years 6 months and 2 years 9 months. District “Part B” personnel shall participate with approval of the parent in the transition IFSP meeting and the meeting will be scheduled within 30 days of notification to district. If the parent agrees to school district attendance, the Service Coordinator, district and family will agree by phone as to the best date of the transition meeting to ensure that the IEP will be held by the child’s 3rd birthday. The Service Coordinator may be from the Tri-Counties or North LA County Regional Center, or from one of our local school district Infant/Toddler programs.

Although meeting in person is the best practice, school district personnel may participate in the meeting by phone, if agreed upon by the family. The purpose of the meeting will be for the district to meet the child and family, discuss program options, consider areas of assessment and for the parent to decide whether or not to make a referral. The referral packet will be given to the school district within the time frame specified on the IFSP Transition Plan. The referral packet will include the most recent assessment(s) and IFSP.

The referral will be made using “**Referral From Early Start Program to School District for Special Education Assessment.**” The Early Start Service Coordinator is responsible for filling out the referral form, which should also include the most recent IFSP and assessment reports. Once the referral has been initiated, the district has 15 days to respond to the referral, by either presenting an Assessment Plan or Prior Written Notice to Parents of Action that it is declining to initiate assessment. Once the parent has signed the Assessment Plan, the 60 day timeline for assessment begins. Allowable interruptions will include school Holidays in excess of 5 days and breaks between regular school sessions. Referrals received within 30 days of the end of the school year must be completed within 30 days of the beginning of the new school year. See [Appendix I-C](#) for a timeline.

For children made eligible for Early Start after 2 years 10 months of age, the transition IFSP meeting will be held with the school district in attendance (if agreed to by family), but the IEP is not required to be developed by the child’s 3rd birthday. Regular school district Part B timelines apply.

Parents must be asked if they would like their Early Start Service Coordinator to be invited to the IEP meeting. If they indicate yes, then the Service Coordinator must be invited using the IEP Invitation form.

If the child may be participating in general education preschool environments, a regular education preschool teacher must be invited to attend the IEP meeting and regular preschool activities will be included in the IEP. The IFSP will be reviewed at the IEP meeting. Services shall start as specified on the IEP, but may be delayed until the reconvening of the district’s program year.

See the “**Three Year Old Transition Checklist for School District ‘Part B’ Preschool Assessment Staff**” which is a tool for documenting the required steps in this process.

S. Triennial Review

All students receiving special education and/or related services in the SELPA will have a Triennial Review at least every three years. Reevaluation may or may not need to be conducted to address the Triennial Review Components.

The purpose of the Triennial Review is to provide information to the IEP Team to determine:

- whether the student continues to have a disability
- present levels academic achievement and related developmental needs
- whether the student continues to need special education services
- whether any additions or modifications to the special education and related services are needed

to enable the child to meet the annual goals to participate as appropriate in the general curriculum.

Within one year prior to the Triennial Review date the IEP Team, including the parents, will review existing data and determine what additional information and assessment will be needed to address these components.

If the team considers the need for additional information and assessment at an IEP meeting, the form “**Worksheet for Determination of Needed Assessment for Triennial Review**” should be completed and included in the IEP.

Using the form, staff and parents consider each of the following areas, and decide whether or not additional assessment is needed:

- a. Eligibility – Regardless of which box is checked, the “comment” section should be filled out. (e.g.: “Need to determine if language ability remains substantially below age-level expectation,” or “team agrees child continues to have disability _____.”)
- b. Academic Achievement/Developmental Needs – If “needed” is checked, note areas.
- c. Need for Services – If “needed” is checked, specify concerns which require assessment.
- d. Additions or Modifications to Services – If “needed” is checked, specify areas to be assessed.

If parent/adult student and school staff all agree no additional assessment is needed, there are options. (See district guidelines). If the team chooses to wait until the next year to conduct the Triennial Review, the team will note date by which meeting will be held. Some IEP teams may choose to proceed to conducting the Triennial Review. If the parent disagrees with the rest of the team, and feels assessment should be done, an Assessment Plan will be developed at least two months prior to the Triennial Review date.

If the team feels additional assessment is needed, an Assessment Plan addressing the areas specified above, at least 2 months prior to the Triennial Review date.

If the decisions about needed assessment are made in a context other than an IEP meeting, all the team members, including the parent must participate in the discussion, either in person or by phone. The “**Documentation of District and Parent/Adult Student Decision Regarding Assessment Needed for “Triennial Review”**” form should be utilized to document the team’s decision.

Regardless of whether or not additional assessment is needed you must still address the questions above in an IEP meeting and document on the IEP. Be sure to check the “Triennial Review” box on the cover page, and address the required areas. A Triennial Review meeting must be a full IEP meeting, and should not be conducted as an Addendum.

For SLD students, the SLD eligibility page must be attached. **School districts or sites approved by the SELPA to participate in the Pattern of Strengths and Weaknesses Pilot will use the **Pattern of Strengths and Weaknesses SLD** page.** Whenever a Triennial Review meeting is held, a new “Triennial Review” due date is established.

If new assessment is conducted the results are reported on the **Psychoeducational Assessment Report or individual Report Forms. The assessors must make specific notations about indicators of special education and recommendations regarding the possible need for special education and related services.**

If new assessment is not conducted, an **Assessment Plan** would not be generated. In preparation for the triennial review meeting, complete the **Summary of Record Review in Preparation for Triennial Review** to indicate sources of data used and findings and recommendations which address the triennial review questions.