COLORADO
Department of Education

Colorado IEP Parent Training

Module 6: IEP Implementation

May 15, 2026

Module 6 overview

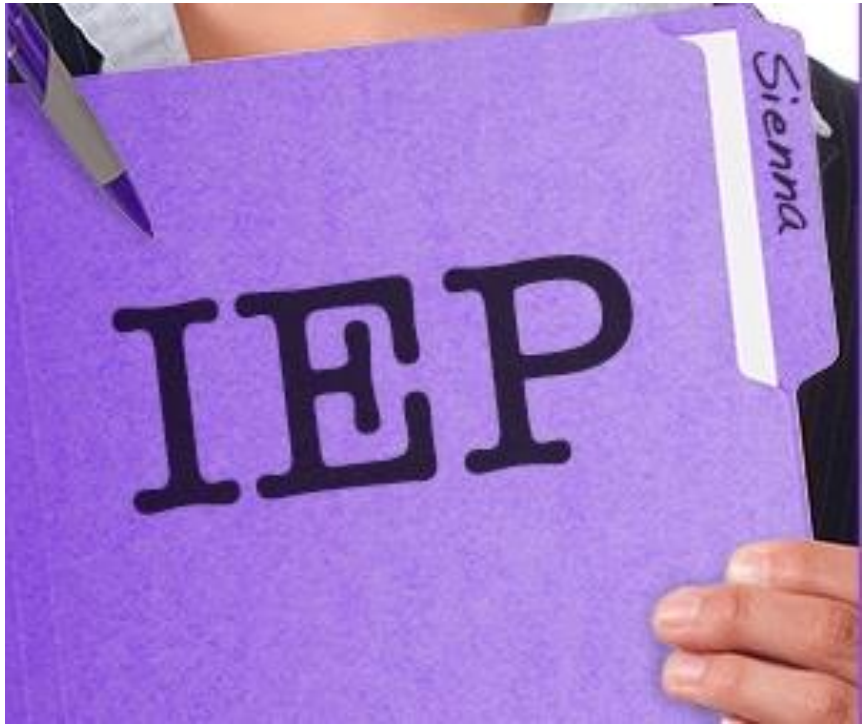
- IEP made accessible to staff
- Delivery of services and supports
- Progress monitoring and reporting
- Parent involvement
- IEP review
- Implementation issues

Review of acronyms

- **IDEA**: The Individuals with Disabilities Education Act
- **ECEA**: The Exceptional Children's Educational Act
- **CDE**: Colorado Department of Education
- **AU**: Administrative Unit, which includes school districts and Boards of Cooperative Education Services (BOCES), etc.
- **FAPE**: Free Appropriate Public Education
- **IEP**: Individualized Education Program
- **PSN**: Procedural Safeguards Notice
- **PWN:** Prior Written Notice

Accessibility of IEP

- After the IEP team completes the IEP, the school-based team must make the IEP accessible to each regular education teacher, special education teacher, related services provider, and any other service provider responsible for its implementation.
- 34 CFR § 300.323.



Delivery of services and supports

- The school must deliver services as written in the IEP as soon as possible following development of the IEP.
- School staff must understand their responsibilities as written in the IEP. They must have the skills to deliver the supports and services.
- School staff must be aware of and implement as appropriate the child's accommodations, modifications, and other supports.
- 34 CFR § 300.323.

Progress monitoring and reporting

- Progress monitoring is an ongoing process of collecting and analyzing data. The school team uses the data to determine the child's progress toward annual goals.
- Progress must be monitored and reported as written in the IEP.
- The progress reports help the IEP team determine if they need to make changes to the child's IEP.

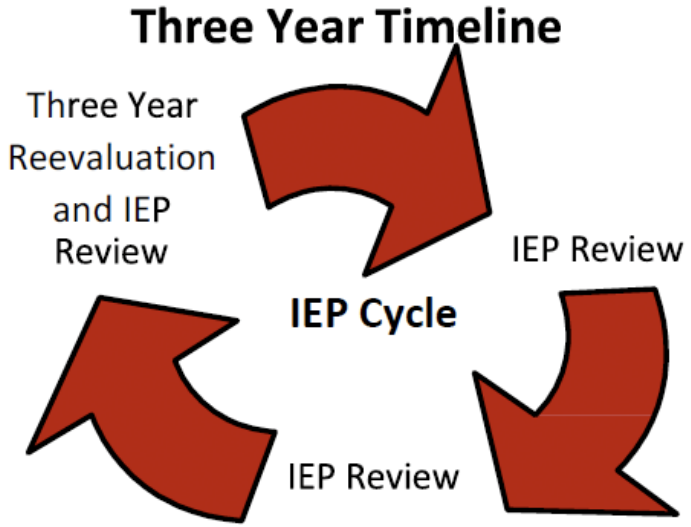


Involvement of parents

- Parents should participate in their child's education throughout the year, not just at IEP meetings.
- Parents should communicate with school staff with questions and concerns about the IEP as they arise.
- Communicating with school staff who know the child (not just those on the IEP team) can give parents a more complete picture of their child's experience.
- The child should also communicate about whether the IEP is providing a meaningful learning experience.
- Parents must be involved in changes to the IEP.

IEP review

- The IEP may be amended if needed. (**Module 4**)
- Parents should stay in communication with school staff about their child's progress and about concerns as they arise.
- Parents can request an IEP meeting if they have concerns that need to be addressed by the entire team.
- The IEP must be reviewed at least annually.
- The child will be reevaluated at least every 3 years. A parent or the AU can request an evaluation sooner if they think the child's educational needs have changed. The team will consider eligibility at each reevaluation.



Relationship of implementation and FAPE

- In implementing an IEP, a school district must provide special education and related services "in conformity with" the IEP. 34 C.F.R. §§ 300.17, 300.324.
- Not providing special education and related services in conformity with an IEP can result in the denial of FAPE. 34 C.F.R. § 300.17; ECEA Rule 2.21(4).
- Not every inconsistency or shortfall will be a denial of FAPE.
- Determinations about FAPE depend on the facts and circumstances of each situation.
- Reviewing agencies will consider the significance of a discrepancy or shortfall.

Implementation issues

- There are many ways in which IEP implementation issues may arise.
  - A child may have a shortfall in services provided. For example, not receiving specific services, supports, or accommodations; progress not monitored; behavior intervention plan not followed; etc.
  - The shortfall will vary in significance. To result in a denial of FAPE, the shortfall must be material. (More on this in upcoming slide.)
- Just as each IEP is individualized to the child, the nature and impact of an implementation issue depends on the specific child's IEP and circumstances.
- In many cases, parents can work with the school staff and/or the IEP team or the AU to resolve the issues.

When you have implementation concerns

- If you have concerns that your child's IEP is not being implemented as written, try to get as complete a picture as possible about what is going on.
- You may want to start with talking to the special education teacher or the AU's special education director. You may also want to request records, as appropriate. Be aware that IDEA does not require schools to keep service logs.
- It is a good idea to follow up your conversations in writing to confirm your understandings and to document the conversation.
- If informal communications are not helping, you may want to request an IEP meeting. CDE offers special education meeting facilitation to support IEP meetings.
- You may also want to consider using IDEA's dispute resolution (DR) options.
- Special education meeting facilitation & DR options are covered in **Module 9**.

Review of implementation issues

- When assessing implementation concerns, the CDE engages in a two-pronged inquiry:
  - (1) was there a shortfall in the provision of services required by the IEP, and
  - (2), if so, did the shortfall amount to a material failure to implement the IEP and thus a denial of FAPE?
- Not every discrepancy between the services provided and what the IEP requires will result in a denial of FAPE.
- To result in a denial of FAPE there must be a material failure to implement an IEP.
- "A material failure occurs when there is more than a minor discrepancy between the services a school provides to a disabled child and the services required by the child's IEP." *Van Duyn ex rel. Van Duyn v. Baker Sch. Dist. 5J*, 502 F.3d 811, 822 (9th Cir. 2007). Material failures may include shortfalls in implementing "substantial," "significant," or "necessary" IEP provisions. Id. at 818.

Module 6 summary

- Implementation of the IEP involves the delivery of services and supports as written in the IEP.
- The IEP must be made accessible to staff, and they must be informed of their responsibilities to implement the IEP.
- Staff must deliver services and supports as soon as possible after the IEP is written. Staff must have the skills and training to deliver the services and supports as written in the IEP.
- Progress must be monitored and reported as written in the IEP.
- Parent participation is part of the process throughout the year. Parents must be involved in changes to the IEP.
- Implementation issues may arise. There are resources and processes to help when this happens.

Individual support

Families, educators, and other professionals with questions about Special Education or needing assistance can contact CDE's Office of Special Education.

Phone: 720-926-1453

Email:

Parents_ESSUquestions@cde.state.co.us



CDE/Colorado resources

- CDE, Colorado Procedural Safeguards Notice (linked on CDE's Individualized Education Program page and at Dispute Resolution, Parent and Child Rights in Special Education)
- CDE, IEP Procedural Guidance
- PEAK Parent Center, Colorado's federally-designated parent training and information center
- Show and Tell, a federally-designated community parent resource center serving the Denver metro and surrounding area
- Disability Law Colorado, Colorado's protection and advocacy system agency

Other resources (not specific to CO)

- Center for Parent Information and Resources (CPIR), Measuring and Reporting Student Progress
- Progress Center IEP Tip Sheet, Measuring Progress Toward Annual Goals
- IRIS Center, Developing High-Quality IEPs, Monitoring & Reporting Student Progress
- IRIS Center, How can school administrators support implementation of high-quality IEPs
- CPIR, Requesting a Meeting to Review Your Child's IEP