



DISCUSSION PAPER: DOCUMENTING SPECIALLY DESIGNED SERVICES ON THE IEP (Su 2018, R 9/2023, 7/20/25)
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Related services personnel (RSP) have been included in IDEA since 1975. Refer to federal references at the end of this paper and Ohio Operating Standards 3301-51-09, which reinforces federal language.

What to consider when determining the need for related service personnel:

- is necessary for the student to fully benefit from their education, address an adverse educational impact
- promotes student access and meaningful participation; progress, student outcomes
- must be educationally relevant, reflects continuum of placement per LRE requirements

Andrew v. Douglas County Supreme court ruling: 03/22/17 Unanimously ruled school meet substantive obligation under IDEA. School must offer an IEP reasonably calculated to enable a child to make progress, appropriate in light of the child's circumstances. IEP must be developed that pursues academic and functional advancement. FAPE does not mean some educational benefit but Meaningful benefit (not merely more than "De Minimis"). Focus not just on full integration into regular education, but consideration of progress based on unique circumstance of child.

This court ruling about FAPE and De Minimis pertains to RSPs when determining the service type and amount of time needed for any given student to have meaningful benefit. Question: Is 30 minutes a month enough time to address a student's needs so there is meaningful progress?

SPECIALLY DESIGNED SERVICES SECTION OF THE IEP

This section documents who, what, why, where, and how much, must clearly describe the related service which aligns with the student's annual goals so a child makes meaningful progress. Descriptive details help others/district understand the related services the child needs. The documentation must be clear, especially for parents. If a child transfers within or outside of the district, clear information will assist the receiving school team in following the IEP as intended.

RELATED SERVICE AS A SPECIALLY DESIGNED INSTRUCTION (SDI)

If determined by the IEP team to be the child's special education, an RSP can be considered specially designed instruction (3301-51-01(B)(62)(a)(ii). This conclusion by the IEP team *can only be reached if a comprehensive* evaluation has been completed, the student meets an educational disability definition and the ETR team has determined the student is eligible for special education and related services. This shared decision-making process also includes identifying how the child's disability adversely affects their educational performance.

At the IEP meeting, the team must first consider and develop the student's goals. If the team determines that the student's educational need only requires a related service, the relevant provider to address student needs becomes the student's SDI.

RELATED SERVICES

1. Type of services: clearly describe skill/behaviors to target, and the focus of the skilled, specialized intervention is documented. The model of delivery-1:1 or small group, is also included. If more than one delivery will be used, that will be documented separately.

2. Goal addressed: list the goal(s) supported by the responsible provider. Do not list the objective. RSP can support other provider's goals.

3. Provider Title: list the discipline title of the provider who is legally and ethically responsible for the service: **Speech Pathologist, Occupational Therapist, Physical Therapist, etc.**

-cannot use Speech and Language personnel, OT/OTA, OT provider, PT services, OTA, PTA, etc.

4. Location of service:

a. list *school environment* when a student goal will be worked on in a variety of settings. The use of the *school environment* descriptor must align with the goal. If the service is provided in a specific/different setting for a portion of a goal or time, document this on a separate row. The location "School environment" also includes community and worksite settings as it relates to student IEP goals.

b. "designated therapy area" can use as location if the space for service delivery is not predictable or consistent.

c. targeted setting -list a specific location/environment where the intervention on student goal will be addressed.

5. Amount of time:

The statement describing the amount of service must be clear to all IEP members, especially parents. For School Age students, we may state the total amount of minutes per week or month, but the frequency of how those minutes will be used must be clear. Examples:

- a. 240 minutes per month, 60 minutes per week (or two 30-minute sessions per week)
- b. 60 minutes per month, three 20-minute sessions per month
- c. 40 minutes, one session per week
- d. Begin/End: if the service time span is different than others, enter the adjusted the start/stop time

For Preschool age students, the statement about service minutes must be stated in minutes per week.

Remember: The amount of service time needed is based on the student goals and objectives the RSP supports. Measurable Annual Goals and objectives are based on the student's previously identified educational needs, not staff schedule limitations or slots available (De Minimis). PTs and OTs must also develop a separate Plan of Care/Treatment, as per licensure requirement, in addition to the IEP.

ASSISTIVE TECHNOLOGY (AT)

Currently this "subsection" is used to document both devices and services. This section is frequently missed or incomplete. AT may be included and referenced in more than one section of the student's IEP. (see reference list for more information about AT).

An Assistive Technology device is any item, piece of equipment, or product system, whether acquired commercially off the shelf, modified, or customized, that directly assists a child with a disability to increase, maintain, or improve functional capabilities. An AT device must be described in terms of context and extent. RSP are to describe the AT features needed by the student rather than naming a specific device. (for a complete definition of AT Devices, see OAC 3301-51-01 (B)(2)).

AT Device Documentation: Listing AT Devices within the AT subsection will help the team locate the information easily. Student-owned devices may be documented in the *Profile* section of the IEP. AT *must* be documented in the *Special Instructional Factors* section of the IEP.

An Assistive Technology Service is any service that *directly* assists the child in the selection, acquisition, or use of an assistive technology device. (for a complete definition of AT Services, see OAC 3301-51-01 (B)(3)).

AT Service Documentation: Include the qualified responsible provider title, a goal, a location, and the amount of time (service minutes).

ACCOMMODATIONS

Child specific supports that provide **access** to course content, promote **participation** are included here. The IEP Team will describe the condition, context, and extent of the accommodation. While this section does not warrant a goal, the actual accommodation must be *targeted* and *required* by the student to access, participate, and make progress within their educational program.

SUPPORT FOR SCHOOL PERSONNEL

This section is used by RSP (and other team members) to document any supportive service provided to a teacher, another RSP, other school staff, etc. “on behalf” of the student). This is for adult-to-adult collaboration and is considered an *indirect* service. The RSP will describe what the provider will do, why, etc. Though documenting *time* is not currently required for SA, including the amount of time in the description is helpful to capture professional service time to better inform workload. The amount of time is required for PS. SSP does not warrant a goal, but this indirect support of others promotes student access, participation, and progress.

This section is also used to document the collaboration of the assistant and their supervising therapist, when this partnership is needed to delivery IEP services to a specific student. (See Operating Standards 3301-51-09 and OAC 4755 regarding the supervision of assistants). Sample statements might be:

PT to supervise PTA delivering IEP services as delegated

OT to supervise OTA carrying out IEP services as assigned

Therapist-assistant service delivery is especially important for students with intensive service and support needs. Remember, the student’s therapy service time is captured under the Related Service section.

SERVICE TO SUPPORT MEDICAL NEEDS

This section includes health-related support, such as planning for the safety of a child in school; ensuring that care is given while at school and at school functions to prevent injury (e.g., changing a child’s position frequently to prevent pressure sores); chronic disease management; etc. A goal is not required.

- This support service is provided *to the child*. This SDS areas does not require a documented amount of time or warrant an IEP goal, however, RSPs are urged to describe the type and extent of the medical support that will be provided. Support for Medical needs must be needed by the student to access, participate, and make progress within their educational program.
- As this is a direct service, OTs and PTs must complete an assessment and professional plan of care as required by their respective Practice Acts prior to the delivery of service.

FEDERAL RESOURCES

IDEA Regulations: Part [300 / A](#) Sec. 300.34 Related Services

- [\(a\)](#) General. *Related services* means transportation and such developmental, corrective, and other supportive services as are **required to assist a child with a disability to benefit from special education**

IDEA Regulations: Part [300 / B](#) Sec. 300.114 LRE requirements

- [\(2\)](#) Each public agency must ensure that--
- [\(i\)](#) 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 nondisabled; and**
- [\(ii\)](#) Special classes, separate schooling, or other **removal of children with disabilities from the regular educational environment occurs only if the nature or severity** of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.
 - Setting/location **where student specific** performance can be reasonably expected
 - Based on student need**, can be a separate space, in a classroom, on campus, in unstructured settings (cafeteria, restroom, bus, playground)
 - Removal from regular ed. only if nature or severity, with support and services, does not promote student success. Regular education with supports & services **first**

- Unique strengths & needs of **each student**
- Maximum extent appropriate with non-disabled children
- When child is removed from general education this must be justified (per 34 CFR Section 330.320 (a)(5) (Ohio-LRE Section of the IEP)

IDEA Regulations: Part 300 / B Sec. 300.115 Continuum of alternative placements

- (a) Each public agency must ensure that a **continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.**
- (b) The continuum required in paragraph (a) of this section must--
 - (1) Include the **alternative placements** listed in the definition of special education under Sec. 300.38 (instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions); and
 - (2) Make provision for **supplementary services** (such as resource room or itinerant instruction) to be **provided in conjunction with regular class placement.**

-Includes related services

- Instruction in: regular classes, special classes, special schools, home, hospitals, institutions;
- Supplementary services (resource room or itinerant instruction)
- Provided in conjunction with regular class placement

-Other considerations/description of services:

- Individual Direct
- Small Group Direct
- Large Group Direct
- Co-teaching, Consultation/collaboration Teacher, staff, student, parent

STATE RESOURCES

Operating Standards: OAC 3301-51-01, 3301-51-09

ODEW/OEC Universal Support Materials:

OEC IDEA Monitoring recordings: <https://education.ohio.gov/Topics/Special-Education/Special-Education-Monitoring-System/IDEA-Onsite-Reviews>

IEP Rollovers: <https://education.ohio.gov/getattachment/Topics/Special-Education/Federal-and-State-Requirements/Ohio-Required-and-Optional-Forms-Updated/Guidance-for-IEP-Form-2024.pdf.aspx?lang=en-US>

DCY Preschool Universal Support Materials: <https://childrenandyouth.ohio.gov/for-providers/preschool-special-education/universal-support-materials>

OCALI

Assistive Technology Resource Guide: <https://ataem.org/at-resource-guide>

AT Consideration in the IEP Process: <https://ataem.org/at-consideration>

Assistive Technology Domains: <https://ocali.org/storage/ocali-ims-sites/ocali-ims-ocali/documents/AT-Domains.pdf>

Assistive Technology Decision-Making tool: https://ims.ocali.io/storage/ocali-ims-sites/ocali-ims-ataem/documents/AT_Decision-Making_Tool.pdf

Assistive Technology Overview: https://ocali.org/storage/ocali-ims-sites/ocali-ims-ocali/documents/Third_Thursday_Understanding_Assistive_Technology_2015-10-12.pdf

AT video (OCALI): <https://www.youtube.com/watch?v=WXRgShc0qdw>

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