

**Ensuring Timely and Consistent Implementation of IEPs for Military-Connected  
Students with Disabilities**

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December 30, 2025

Suggested citation: Cornelius, K. E., Hott, B. L., & Curran, J. (2025). *Ensuring timely and consistent implementation of IEPs for military-connected students with disabilities* (Executive summary). InnovateEDU.

## **Ensuring Timely and Consistent Implementation of IEPs for Military-Connected Students with Disabilities**

In the United States, school mobility outside of planned, or structural, transitions (e.g., elementary to middle school or middle to high school) is common and carries significant implications for educational continuity. Longitudinal data indicate that 40–50% of students experience at least one nonstructural school move between Grades 3 and 12, and 15–25% experience two or more such moves (Goldhaber et al., 2022). For students with disabilities (SWD), these moves pose greater risk because access to a free and appropriate public education (FAPE) depends on the timely and consistent implementation of individualized education programs (IEPs). Each transition requires receiving districts to interpret and implement IEPs developed under differing state policies, district procedures, and professional norms.

Concerns about IEP implementation are well documented even in stable educational settings. Evidence shows that IEPs frequently demonstrate both procedural and substantive compliance issues. Further instructional quality is poor. Gaps related to IDEA requirements, including the documentation and delivery of services aligned with FAPE (Hott et al., 2021). When students move across districts or state lines, these challenges are amplified. Although IDEA requires receiving districts to provide services comparable to those in a student’s existing IEP during school transfers (34 C.F.R. § 300.323[f]), the regulation affords states and districts substantial discretion in defining and operationalizing key service terms, including specially designed instruction, service frequency, intensity, setting, and progress monitoring. During the 30-day interim period, districts may review records and, when appropriate, conduct new evaluations to

determine continued eligibility under the receiving state's criteria, a process that can delay implementation or result in changes to services (U.S. Department of Education, Office of Special Education Programs [OSEP], 2009).

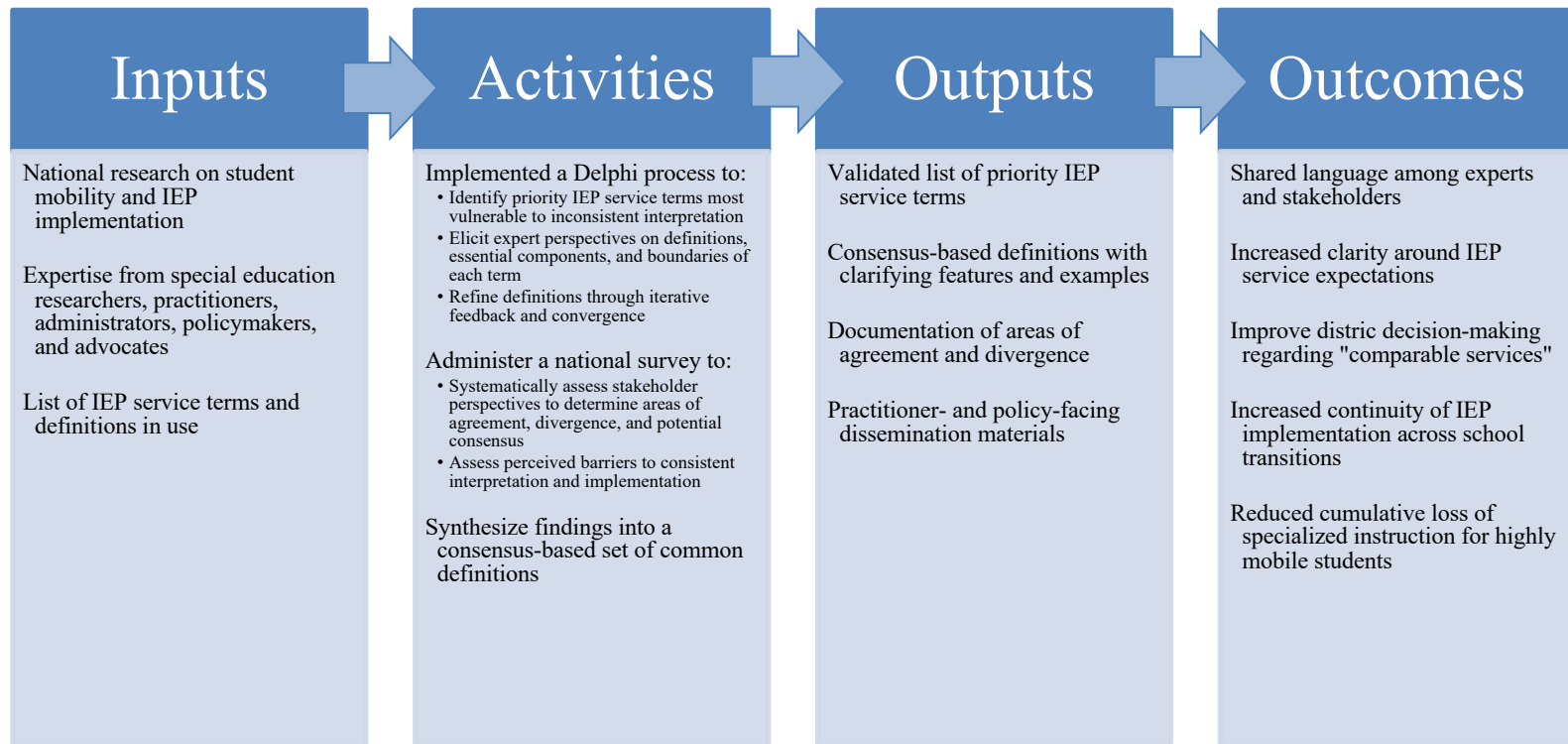
The absence of shared definitions across jurisdictions creates predictable special education service delays. These systemic conditions are associated with an average delay of 5.4 months before services for transferring students with disabilities fully align, or comparable, with those previously provided (Partners in PROMISE, 2022). For highly mobile populations, particularly military-connected students who experience repeated, cross-state moves, these delays accumulate, resulting in substantial loss of specialized instruction and inconsistent access to a FAPE.

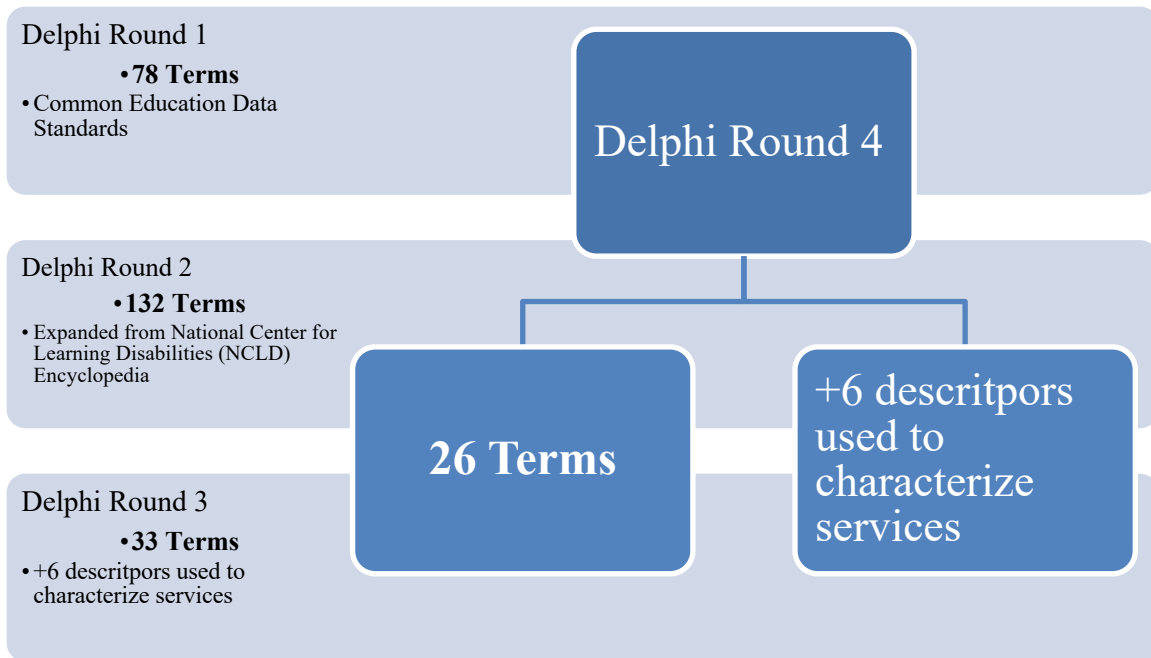
Taken together, this evidence points to a structural policy challenge rather than isolated compliance failures. Without common, cross-state definitions of IEP service terms, districts lack the clarity necessary to ensure continuity during transitions. Establishing shared definitions represents a critical policy lever for improving implementation fidelity, reducing service delays, and protecting the educational rights of highly mobile students with disabilities.

Figure 1 illustrates the project logic model. The model connects the identified problem of inconsistent IEP implementation during student mobility to the consensus-building activities and anticipated outcomes. The model shows how the absence of common, cross-state definitions of IEP service terms leads to implementation delays and service variability and demonstrates how iterative consensus development and expert validation are expected to produce shared terminology, improve implementation fidelity, and strengthen continuity of services for highly mobile students with disabilities.

**Figure 1**

*Logic Model: Establishing Common Definitions for IEP Service Terms*



**Figure 2***Delphi Round Summary*

A Delphi process (Clayton, 1997) was used to reach initial consensus among an expert panel including (1) higher education faculty with expertise in special education law, (2) practitioners with expertise in occupational therapy, applied behavior analysis, and speech and language pathology, (3) educators with experience teaching general and special education and responsibilities including IEP development and implementation, and (4) experts in special education law and policy working on behalf of national organizations. Following a request from Moving on the Mission, the formation of an expert panel, and Institutional Review Board approval, the panel identified 77 terms from the Common Education Data Standards (CEDDS), a U.S. Department of Education supported voluntary initiative that promotes consistent education data definitions and interoperability across systems.

Next through a series of virtual meetings, the panel expanded the list to 132 definitions by adding expert-informed terms from the National Center for Learning Disabilities (NCLD) Encyclopedia. Round 3 was completed electronically and focused on IEP service term refinement, narrowing the list to 33 IEP service terms, while retaining 6 additional descriptors used to characterize service delivery (e.g., direct service, indirect service, accommodation). Round 4 was also completed electronically and the panel reached consensus, resulting in a final set of 26 core IEP service terms, supplemented by the 6 descriptive service modifiers.

Following panel consensus, the authors developed an instrument that included the 32 terms and associated definitions. The panel determined a priori that 80% agreement would meet field acceptance of each term (Diamond et al., 2014). The survey was distributed through the Council for Exceptional Children (CEC) to members who self-identified as school-based practitioners (e.g., administrators, related service providers, and teachers). A total of 14,739 members received the invitation to participate. Two reminder emails were sent during the data-collection window to increase response likelihood. Across the three mailings, between 4,516 and 5,788 recipients opened the invitation email, and 1,094 individuals opened and completed at least a portion of the survey items.

The survey included a consent document and allowed participant to individually view each term and associated definition. Next, participants were able to select agree or disagree with each definition. Between September 26, 2025, and December 1, 2025, 1,092 educators (10.60%;  $n = 453$  administrators,  $n = 83$  related service providers,  $n = 423$  teachers,  $n = 133$  did not identify role) responded to the survey.

Of the 32 terms presented, at least 80% of the respondents agreed with 30 of the definitions presented. Two terms did not reach the established 80% participant agreement. Assistive technology (72%) and applied behavior analysis (77%) had some disagreement among participants. See Table 1 for a list of terms, associated definitions, and percentage agreement with the definition.

**Table 1**

*Terms, Definitions, and Field Agreement*

Term	Definition	Consensus %
Service	Specially designed instruction and supports provided at no cost to the family to meet the unique needs of a student with a disability. These services are intended to ensure access to the general curriculum and promote educational progress in the least restrictive environment for the student. Services include specially designed instruction and related services, which may be delivered directly or indirectly, depending on the needs of the student.	95%
Direct Services	Services that are provided directly to a child by a special education teacher or related services professional. Direct service can be provided to an individual child or to a small group of children with similar needs and are provided in order for a child to meet the goals and objectives on the child’s IEP.	96%
Indirect Services	Services that are not provided directly to a child. A special education teacher or related service professional provides these services to others who are working directly with a child. Indirect services may include activities such as 1) Staff consultation with a general education teacher or other school staff on situations resulting from a child’s disability 2) Modifying curriculum or environment for a child 3) Observing a child 4) Monitoring a	93%

	child’s progress in a specific area 5) Monitoring equipment or assistive technology used by a child.	
Adaptations	Changes educators make to their teaching, assignments, or the environment, in collaboration with the IEP team and other partners, to help ensure student success.	87%
Accommodations	Adaptations that do not change or reduce the standard, that allow a student to participate and progress in the general education curriculum.	91%
Modifications	Adaptations that change what a student is taught or expected to learn, altering the content or standards.	93%
Adapted Physical Education (APE)	Specially designed physical education instruction that is modified or adapted to meet the unique needs of students with disabilities.	96%
Assistive Technology	Programs that directly assist an individual with disabilities in the selection, acquisition, or use of an assistive technology. Such assistance includes: 1) the evaluation of the needs of an individual, including a functional evaluation of the individual in his or her customary environment; 2) purchasing, leasing, or otherwise providing for the acquisition of assistive technology devices; 3) selecting, designing, fitting, customizing, adopting, applying, maintaining, repairing, or replacing assistive technology devices; 4) coordinating and using other therapies, interventions, or services (e.g., those associated with existing education and rehabilitation plans and programs); 5) training and technical assistance for an individual or, if appropriate, an individuals' family members; and 6) training or technical assistance for professionals (including those providing early intervention services), employers, or other individuals who are substantially involved.	72%

<p>Augmentative and Alternative Communication Services</p>	<p>A type of assistive technology service that uses equipment, tools, and/or strategies to supplement or compensate for impairments in speech-language production and/or comprehension, including spoken and written modes of communication, on a permanent or temporary basis for students who are unable to use speech alone to meet their daily communication needs.</p>	<p>95%</p>
<p>Applied Behavior Analysis (ABA)</p>	<p>Services provided by a board-certified behavior analyst or a registered behavior technician under the supervision of a BCBA that are designed to improve the student’s socially significant behaviors.</p>	<p>77%</p>
<p>Behavioral Services</p>	<p>Interventions and strategies designed to address a student's behavior that interferes with their learning or the learning of others.</p>	<p>94%</p>
<p>Braille Services</p>	<p>The development of braille materials and the specialized braille instruction for students who are blind or have visual impairments.</p>	<p>97%</p>
<p>Career and Technical Education Rehabilitation Training and Job Placement</p>	<p>Focuses on providing individuals with disabilities the skills and support needed to enter or return to the workforce, aligning with the goals of vocational rehabilitation.</p>	<p>94%</p>
<p>Communication Services</p>	<p>Programs that help participants develop or refine their communication skills, usually by focusing on communication in a particular context (e.g., helping a parent/guardian communicate with a child or helping professionals communicate with their clients).</p> <p>Training may emphasize active listening skills, problem-solving skills, conflict resolution techniques, body language, empathy, sensitivity to the values and/or cultural background of other, genuineness and other facets of the communication process.</p>	<p>80%</p>
<p>Extended School Year (ESY)</p>	<p>Special education and related services that: 1) Are provided to a child with a disability - beyond the normal school year of the public agency; in accordance with the child's IEP</p>	<p>92%</p>

	<p>goals and areas of need; and at no cost to the parents of the child. 2) Are necessary when the skills or progress a child with a disability gains during the regular school year will be significantly jeopardized without a continued educational program during school breaks, or when other factors—such as severity of the disability or critical emerging skills— indicate that a break in services would deny the child FAPE. 3) Parents may choose to decline ESY services without impacting the student's eligibility for special education services during the following school year.</p>	
<p>Family training, counseling, and home visits</p>	<p>Services provided, as appropriate, by social workers, psychologists, and other qualified personnel to assist the family of a child eligible under this part in understanding the special needs of the child and enhancing the child's development.</p>	<p>88%</p>
<p>Functional Behavior Assessment</p>	<p>A process used to determine the purpose of a particular targeted behavior that is impeding a student’s educational performance. Once the purpose (or function) of the behavior is identified, in addition to the factors maintaining the behavior, educators can create a plan to address the behavior.</p>	<p>95%</p>
<p>Instructional Aide/Assistant/Intervener Service</p>	<p>Refers to the provision of support from a paraprofessional or aide to assist a student with a disability in accessing their education, whether through direct instruction or support with daily tasks, as determined by the IEP team.</p>	<p>92%</p>
<p>Interpretation for the Hearing Impaired</p>	<p>Services that enable students who have hearing impairments to communicate their needs manually, verbally, or in writing. Interpreting services include oral transliteration services, cued language transliteration services, sign language transliteration and interpreting services, and transcription services, such as captioning technologies. This service is also provided to students who are deaf-blind.</p>	<p>98%</p>

<p>Nursing Services</p>	<p>Services that are provided for the assessment of health status for the purpose of providing nursing care, including the identification of patterns of human response to actual or potential health problems. They also include the provision of nursing care to prevent health problems, restore or improve functioning, and promote optimal health and development. Finally, they involve the administration of medications, treatments, and regimens prescribed by a licensed physician.</p>	<p>92%</p>
<p>Occupational Therapy</p>	<p>Services provided by a licensed occupational therapist or occupational therapy assistant under the direction of an occupational therapist, that are designed to improve the student’s functional ability to perform tasks in the school.</p>	<p>86%</p>
<p>Orientation and Mobility Services</p>	<p>Programs that help individuals who are blind or who have visual impairments by qualified personnel to develop the fundamental spatial concepts and skills that are necessary for mobility and independent living. Instruction focuses on moving safely and efficiently in the school, home or community environment, and usually includes procedures for street crossings, travel in unfamiliar areas, utilization of public transportation, and appropriate use of aids such as sighted guides or canes.</p>	<p>95%</p>
<p>Physical Therapy</p>	<p>Services provided by a licensed physical therapist or physical therapy assistant, under the direction of a physical therapist, that are designed to prevent, alleviate, or compensate for movement dysfunction and related functional problems.</p>	<p>87%</p>
<p>Psychological Services</p>	<p>Services provided by a certified or licensed school psychologist that are designed to support the mental health, learning, and behavior of the student, ultimately helping them succeed academically, socially, and emotionally.</p>	<p>93%</p>

Rehabilitation Counseling	Services that focus specifically on career development, employment preparation, achieving independence, and integration in the workplace and community of a student with a disability.	88%
Residential Services	Programs that provide a therapeutic living environment in community-based residential facilities for students with disabilities. Such individuals require a structured, supervised treatment program that may include individual, group, family, and other treatment modalities as appropriate.	94%
Social Work Services	Services provided by a licensed social worker that are designed to support a student’s social, emotional, and behavioral functioning to enable meaningful participation in their educational program.	93%
Speech-language Services	Services provided by a licensed speech-language pathologist or a speech-language assistant, under the direction of a licensed speech-language pathologist, that are designed to improve the student’s speech, language, and communication skills to improve educational and social performance in schools.	96%
Supported Employment	Services include assigning a "job coach" to work side-by-side with each client, offering advocacy to the employer and other employees, training in basic job skills and work-related behaviors, assisting with specific tasks as needed, and providing initial and ongoing support as required to ensure that the individual retains competitive employment.	94%
Translation and Interpreter Services	Services that allow individuals who cannot comprehend or communicate using either the spoken or written language used by the school system to understand or express themselves in their primary language (e.g., foreign language translator, sign language interpreter).	97%
Transportation Services	Services that provide transportation for individuals, or make arrangements to	94%

	transport individuals, to and from home, schools, or sites in which they are involved in vocational or rehabilitation activities . These services may include: 1) Travel to and from school and between schools; 2) Travel in and around school buildings; and 3) Specialized equipment (such as special or adapted buses, lifts, and ramps), if required to provide special transportation for a student with a disability.	
Vision Services	Services that include specialized educational supports designed to meet the unique needs of students who are blind or visually impaired, including training for communication and compensatory skills (e.g., alternative formats to produce written information including the use of Braille, large print, audio recordings, or assistive technologies like speech-to-text software), use of assistive technology, orientation and mobility skills, visual efficiency skills, independent living skills, social skills, career education, self-determination skills, and recreation and leisure skills as aligned with the Expanded Core Curriculum (ECC) to promote access, independence, and academic success.	96%

**Discussion**

The results of this study underscore that schools and educators are motivated to implement IEPs appropriately and in good faith. However, without a shared understanding of core service terms, consistent implementation is difficult to achieve. A respectable response rate from special education professions and the high levels of agreement across most definitions suggest that it is possible to systematically implement service terms across jurisdictions. Variability in interpretation could be explained through differences in professional training, state guidance, and local service delivery models, all of which complicate implementation during student transitions. An 80% agreement

threshold was established *a priori*, a level that exceeds the average consensus threshold reported in prior studies (approximately 75%; Diamond et al., 2014), further strengthening confidence in the resulting definitions despite known sources of variability.

Next steps will include conducting focus groups with survey respondents who volunteered their contact information to participate in a follow up study. These focus groups will examine how educators operationalize IEP service terms in practice, explore reasons for disagreement on select definitions, and surface contextual factors related to service delivery. These findings will inform refinements to definitions and identify where flexibility is necessary to accommodate legitimate differences in service delivery while maintaining a shared conceptual foundation.

### Conclusion

Developing clearly defined IEP service terms is a necessary first step toward supporting schools in honoring a FAPE for military-connected students with disabilities during school transition and enabling truly transportable IEPs. By reducing ambiguity at transfer, shared definitions promote continuity of services across districts and states where frequent moves are common. Continued national engagement and iterative validation will be necessary to balance clarity with flexibility, ensuring definitions strengthen implementation fidelity without constraining context-responsive service delivery. Given that up to half of U.S. students experience at least one non-structural school move (Goldhaber et al., 2022), this work extends beyond military-connected populations and offers a scalable approach to improving continuity for all highly mobile students.

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