An Analysis of Activities and Success Patterns of Coordinators of Planning, Monitoring, and Data Collection

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AN ANALYSIS OF ACTIVITIES AND SUCCESS PATTERNS
OF COORDINATORS OF PLANNING, MONITORING,
AND DATA COLLECTION

by

William D. Howard

A Dissertation
Submitted to the
Faculty of The Graduate College
in partial fulfillment of the
requirements for the
Degree of Doctor of Education
Department of Special Education

Western Michigan University
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AN ANALYSIS OF ACTIVITIES AND SUCCESS PATTERNS
OF COORDINATORS OF PLANNING, MONITORING,
AND DATA COLLECTION

William D. Howard, Ed.D.
Western Michigan University, 1983

Public Law 94-142, the Education of all Handicapped Children Act, 1975, requires school districts, through evaluation, to document compliance to the law and its regulations. In Michigan, the individuals primarily responsible for the monitoring of compliance to these federal rules and regulations at the intermediate education unit (IEU) level hold the position known as Coordinator of Planning, Monitoring, and Data Collection (CPMDC). Little is known about how persons holding CPMDC positions function. A review of the literature revealed a need for more information concerning these positions so that data based decisions can be made. This investigation was concerned with patterns which emerged between the perceived importance of and time spent engaging in seven required CPMDC activities.

Based on the results of on-site monitoring visits, each Michigan IEU was ranked according to the number of state department negative citations received. Ten IEUs with the least number and another 10 with the most negative citations were selected to form two groups. Following a field test, each of the CPMDCs from the 20 IEUs was interviewed on-site and asked to rank the perceived importance of required activities and time spent engaging in them. In order to determine the extent to which participants' rank
ordering tended to be in agreement, the investigator made use of Kendall's statistic, \( W \), the "coefficient of concordance."

The results of this investigation indicate agreement among the low citation group and a lack of agreement among the high citation group concerning the importance of and time spent engaging in required activities. The low group also participated in fewer non-required activities than the high group. While limitations of the study preclude making casual statements about the variables, recommendations included a need for the role and responsibilities of the CPMDC position to be more clearly defined.
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DEDICATION

To my loving partner in life, Mary. Thank you for your endless support and encouragement.
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During the last three years I have been associated with an outstanding department of special education. I wish to express my deep appreciation to Morvin Wirtz, my advisor and mentor. The commitment on the part of my committee members, Elizabeth Patterson, Abraham Nicolaou, and Gerald L. Sievers, was exceptional.

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CHAPTER I

INTRODUCTION

In recent years, special education administrators have spent a great deal of time revising existing procedures in order to achieve compliance with Public Law (P.L.) 94-142, the Education of All Handicapped Children Act, 1975 (Howe, 1981). The definition of compliance is "to obey a court ruling or legislative requirement" (Hanson & Penrod, 1980, p. 44). School districts operating under the jurisdiction of P.L. 94-142 (all states except New Mexico) are required to demonstrate compliance or be penalized (Abeson & Ballard, 1976). P.L. 94-142 requires school districts to plan and carry out certain processes (e.g., due process, individual educational planning, etc.) and through evaluation, document compliance to the law and its regulations in these critical activities (R. O. Brinkerhoff, 1979). It is assumed that if an intermediate education unit (IEU) or local educational agency (LEA) is in legal compliance, the effectiveness of programming is increased (Howe, 1981).

The agency at the federal level responsible for assuring that compliance will occur was first known as the Bureau of Education for the Handicapped (BEH). It later became the Office of Special Education and Rehabilitative Services (OSERS) and now has the title of Special Education Programs (SEP). The federal monitoring procedures of SEP include the following four components:
1. Review of each state's program plan
2. Program administrative review
3. Complaint management system
4. Waiver procedures (Califano, Berry, & Boyer, 1979)

SEP conducts on-site monitoring visits to at least half of the participating states annually (Howe, 1981).

At the state level, the Special Education Service Area (SESA) of Michigan's Department of Education (MDE) is the agency responsible for special education. It utilizes on-site review procedures when monitoring IEUs and LEAs. On-site review procedures are used, in part, to provide compliance information to the federal government. The liaison between SESA and IEUs is provided by individuals who hold the position of Coordinator of Planning, Monitoring, and Data Collection (CPMDC). At the present time there is no definition of this position in Public Act (P.A.) 198, Michigan Special Education Rules, as amended August 13, 1980 (P.A. 451).

The seven activities which individuals holding CPMDC positions are responsible for coordinating, as reported by the 1981-83 Michigan Annual Program Plan (APP), are the following:

(a) Maintenance of the student registry and conduct periodic audits regarding its validity.
(b) Collection and editing of the following MDE forms, verification of their accuracy, and timely submission to the appropriate service areas:

1. DS-4061 membership reports and DS-4096 final cost reports (submitted to Department Services).
2. SE-4568, December 1 Special Education Student Count (submitted to the Special Education Service Area)

3. SE-4625 Title VI-B, P.L. 94-142 application (submitted to the Special Education Service Area)

(c) Preparation of all intermediate education unit Title VI applications, monitoring of project progress and timely submission of the year-end reports.

(d) Meetings with the parent advisory committee on at least a quarterly basis to provide for communication and dissemination of current and pressing issues regarding the special education delivery system.

(e) Meetings with LEA and ISD [IEU] personnel regarding Michigan Department of Education intermediate district plan criteria and modifications as required under P.A. 198 and P.L. 94-142.

(f) Reporting of all cases of noncompliance regarding the intermediate plan and assisting in the final resolution of those problems. Development of procedures to monitor compliance to the intermediate plan and assisting in implementation of corrective action.

(g) Review of applications and provision of technical assistance to school districts on projects submitted regarding professional development, demonstration, and research activities. (Amended Annual Program Plan for Fiscal Years 1981-83, 1981, pp. 18-19)

During the years 1981-83 about $27,000 was provided to each Michigan intermediate education unit from P.L. 94-142 funds to support its Coordinator of Planning, Monitoring, and Data Collection position. This money was allocated to assist the intermediate education unit to fund "the person responsible for collecting accurate data and otherwise assuring that all handicapped students are identified, evaluated, and placed, and provided other needed services to assure the implementation of free appropriate public education programs for all children" (Amended Annual Program Plan for Fiscal...
At the present time special education resources are being expended on the relatively new positions of CPMDC which may or may not be viewed as a priority position by decision makers such as LEA and IEU superintendents, directors of special education, boards of education, and Michigan's Director of Special Education. As federal and Michigan resources decline, decisions will have to be made as to whether the Coordinator of Planning, Monitoring, and Data Collection positions should be continued, modified, or discontinued. However, decisions of this nature, to be meaningful and valid, must be based on research data. Currently, no such data are available.

Purpose

Based upon a review of the literature, discussions with individuals holding the position of Coordinator of Planning, Monitoring, and Data Collection, and special education decision makers, there is an evident need for more information. A better understanding of the Coordinator of Planning, Monitoring, and Data Collection position in the state of Michigan is required so that decisions related to this position may be data based.

The specific objectives for this investigation are:

1. To collect data concerning the specific types of tasks in which an individual holding a Coordinator of Planning, Monitoring, and Data Collection position engages and the amount of time spent performing these tasks.
2. To investigate any pattern which may emerge between the tasks and the amount of time spent performing these tasks by the Coordinator of Planning, Monitoring, and Data Collection and the number of Special Education Service Area negative citations received by the intermediate education unit.
CHAPTER II

REVIEW OF THE RELEVANT LITERATURE

The present study was undertaken to review relevant practices in order to establish a better understanding of the function of CPMDcs.

The first section of Chapter II consists of the definitions of key terms to be used in the study. The federal involvement in mandatory special education and the need for states to comply with the rules and regulations of P.L. 94-142 will be explained in the second section. In the third section, Michigan's Coordinator of Planning, Monitoring, and Data Collection role and responsibilities will be presented. A review of task identification and task analysis in relationship to CPMDC positions will be presented in the fourth section.

Definition of Key Terms

For the purpose of this study, the following terms are defined in order to provide clarification and consistency throughout this document.

Citation: means a recorded violation of a standard by the Special Education Service Area monitoring team as indicated by public document.

Compliance: means "to obey a court ruling or legislative requirement" (Hanson & Penrod, 1980, p. 44).
Documentation: means "Any written forms, worksheets, board actions, logs, policies, letters, district-wide surveys, or parent advisory council minutes used to establish the existence of implementation of special education standard" (Birch, Braccio, & Parshall, 1981, p. 3).

Individual education planning committee (IEPC): means "persons appointed and invited by the superintendent to determine a person's eligibility for special education programs and services and, if eligible and in need of special education programs and services, to develop an individualized education program" (P.A. 198, R. 340,1701a, Rule la (b)).

Individualized education program (IEP): means a written statement for each handicapped child developed in any meeting by a representative of the local educational agency or an intermediate education unit who shall be qualified to provide or supervise the provision of, specially designed instruction to meet the unique needs of handicapped children, the teacher, the parents or guardian of such child, and, whenever appropriate, such child, which statement shall include (A) a statement of the present levels of educational performance of such child, (B) a statement of annual goals, including short-term instructional objectives, (C) a statement of the specific educational services to be provided to such child, and the extent to which such child will be able to participate in regular educational programs, (D) the projected date for initiation and anticipated duration of such services, and (E) appropriate objective criteria and evaluation procedures and schedules for determining, on at least an annual basis, whether instructional objectives are being achieved. (P.L. 94-142, Section 602 (19); 20 USC 1402).

Intermediate educational unit (IEU): means any public authority other than a local educational agency, which is under the general supervision of a State educational agency, which is established by State law for the purpose of providing a free public education on
a regional basis, and which provides special education and related services to handicapped children within the State. (P.L. 94-142, Section 602 (22); 20 USC 1402).

**Local educational agency (LEA):** means the public educational agency other than the intermediate or state agency, which is established in a community type setting as the local educational system.

**Monitoring:** means "The continuous examination of a special education delivery system without interfering with its ongoing operation. It is designed to ascertain if the programs and services are being operated in compliance" (Birch et al., 1981, p. 3).

**Noncompliance:** means failure to adhere to special education federal and state rules, regulations, State Board of Education policies, and individual IEU Approved Annual Plans (Birch et al., 1981).

**On-site review:** means "The on-location comparison of the special education delivery system against specified standards. It is designed to yield a profile showing areas in which new procedures, staff development or other methods of improvement might be needed" (Birch et al., 1981, p. 4).

**Performance objectives:** means "a set of specific behavioral statements representing measurable steps towards the achievement of the short-term instructional objectives and annual goals written in the individualized education program" (P.A. 198, R. 340.1701a, Rule 1a (j)).

**Proof of compliance:** means "the written documentation or on-site observation that a rule, identified as being out of compliance, has been corrected. Proof of compliance establishes that a rule meets the minimum(s) [sic] described within the standards"
Special education: means "specially designed instruction at no cost to parents or guardians, to meet the unique needs of a handicapped child, including classroom instruction, instruction in physical education, home instruction, and instruction in hospitals and institutions" (P.L. 94-142, Section 602 (16); 20 USC 1402).

Special education classroom: means "a classroom that is under the direction of an approved special education teacher and in which a person receives specially designed instruction" (P.A. 198, R. 340.1710b, Rule 1b (f)).

Special Education Service Area (SESA): means the state agency responsible for special education services within Michigan's Department of Education.

Standards: means

The minimal acceptable level against which special education delivery systems are compared. The intent of the comparison is to answer the question: "Is this standard in evidence and operational?" Usually this question is answered with a simple yes or no. In Michigan, the statements are used for monitoring purposes and are restatements of special education rules and regulations. (Birch et al., 1981, p. 4)

Systems problem: means

An indication that a standard that is out of compliance is pervasive throughout the delivery system. The vastness of the problem indicates that corrective action must be taken on behalf of all students within the district. And a major alteration of the procedures used to implement the system will need to be undertaken to come into compliance. (Birch et al., 1981, p. 4)

Validation: means

The process by which SESA establishes the credibility of the data collection procedures utilized through the ISD
[IEU] monitoring evaluation system. Substantiation is based upon three variables: (a) an approved model, (b) which is administered with depth and accuracy, and (c) clearly identifies corrective action and follow-up procedures. (Birch et al., 1981, p. 4)

The Federal Mandate

In the past it has been assumed that local communities controlled and were responsible for the public schools (Martin, 1979). Although the Constitution of the United States does not indicate that education is a function of the federal government, and therefore is the individual state's responsibility, the public schools have been increasingly influenced by the judicial, legislative, and executive branches at the federal level (Reutter, 1981). A review of the major instances of federal involvement that led to mandatory special education at the federal level is necessary to bring P.L. 94-142 compliance efforts into focus.

The civil rights court case, Brown v. Board of Education (1954), resulted in a decision that education must be available on equal terms for all. The Brown case has been used by advocates for children with handicaps who were being denied a free public education. The 1964 Civil Rights Act also established the precedent that free and appropriate education, regardless of race, color, or nationality was a fundamental right for all (Martin, 1979).

During the 1970's a fundamental change occurred in legislation dealing with the handicapped concerning those states having permissive legislation. Permissive legislation at the state level, which means that the public may provide special education programs and
related services in efforts to meet the needs of handicapped students, became mandatory special education at the federal level. Mandatory legislation required the public schools to provide special education programs and related services without choice in order to receive special education funds from the federal government. The question can be raised as to why mandatory legislation concerning the education of handicapped students occurred.

The impetus for mandatory special education at the federal level came from organized groups, primarily consisting of parents who had handicapped children (Wirtz, 1977). Among these parent groups, the Pennsylvania Association for Retarded Children (PARC) in January, 1971, brought suit against the state of Pennsylvania. PARC successfully argued that the state of Pennsylvania had failed to provide all retarded children a free public education (Levine & Wexler, 1981).

In essence, P.A.R.C. argued that mentally retarded children were not receiving their full right to an education because the state was delaying or ignoring its constitutional obligations to provide a publicly supported education to the retarded, the same education that state law and Equal Protection of Law Clause of the 14th Amendment of the U.S. Constitution required. (Levine & Wexler, 1981, pp. 38-39)

Thus, mandatory education became tied to the 14th Amendment of the U.S. Constitution and its federal basis established. Following a three judge ruling, the PARC and the state of Pennsylvania (1971) became the first major special education court case involving the right to a free appropriate public education.
Shortly after the PARC case, a suit was brought against the Board of Education of the District of Columbia by the parents and guardians of seven handicapped children. In this case, Mills v. Board of Education of the District of Columbia (1972), the Federal Court issued a decree in favor of the parents and guardians (Abeson & Zettel, 1977). The three major differences between the PARC and Mills court case were, (a) that in the Mills decision all handicapped students were involved, not just the mentally retarded; (b) the federal court issued a decree rather than a consent agreement; and (c) because the location of the suit occurred in the District of Columbia, the decision affected all federal jurisdictions and not only one specific state (Levin & Wexler, 1981). In addition to judicial actions, legislative measures began to influence the decline of permissive special education.

Parent, professional, and handicapped groups concerned about the rights of handicapped adults began lobbying for legislative measures which would assure the handicapped their rights. The first such legislative effort was P.L. 93-112, the Vocational Rehabilitation Act of 1973. The 93rd Congress passed this landmark piece of legislation in September 1973, overriding President Gerald Ford's veto. Title V, Section 504 of the Vocational Rehabilitation Act of 1973 reads, "No otherwise qualified handicapped individual in the United States . . . shall, solely by reason of his handicap be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance" (Clelland, 1978, p. v). The congressional
intent of Section 504 is identical to Section 601 of Title VI of the Civil Rights Act of 1964 in regard to nondiscrimination procedures (Clelland, 1978).

However, despite Section 504 of the Vocational Rehabilitation Act of 1973, the great majority of states and school districts did not respond by providing free and appropriate education to all handicapped children (Martin, 1979). Therefore it became essential, in the opinion of many advocates for the education of the handicapped, to pass a law at the federal level specifically addressing the educational needs of this population. Following lengthy debate and congressional committee testimony, President Ford signed into law P.L. 94-142, the Education of All Handicapped Children Act of 1975 during November 1975 (Martin, 1979). P.L. 94-142 enhanced and specified more clearly certain aspects of special education addressed in previous legislation such as P.L. 93-380, the Education Amendments of 1974 (Gearheart, 1980).

In essence, P.L. 94-142 has one major purpose, to assure that:

All handicapped children have available to them ... a free appropriate public education which emphasizes special education and related services designed to meet their unique needs, to assure that the rights of handicapped children and their parents or guardians are protected, to assist states and localities to provide for the education of all handicapped children, and to assure the effectiveness of efforts to educate handicapped children. (P.L. 94-142, Section 601 (c) 20 USC 1401)

Cole and Dunn (1977) noted that P.L. 94-142 is a programmatic law, that is, in order to receive allocated special education funds from the federal government a state has to comply with the law and regulations in four basic areas. First, P.L. 94-142 assures the
right to a free and appropriate public education, due process, nondiscriminatory testing and labeling, and confidentiality of personal records and files. Second, the law directly links LEAs with the federal government through the various state departments of education which are required to establish monitoring procedures and, in reality, police the IEUs and LEAs in order to assure accountability. Third, P.L. 94-142 provides funding to establish the programs that will assist states, IEUs, and LEAs in complying with mandatory legislation. Fourth, P.L. 94-142 funds have facilitated in-service education, media centers, equipment, and new classroom teachers of the handicapped. Finally, P.L. 94-142 requires an Individual Educational Plan (IEP) for each handicapped student and placement of the handicapped student in the least restrictive environment.

Each LEA and/or IEU is required to submit a detailed plan of compliance to the state for approval. To receive P.L. 94-142 funds, each state is required to submit a compliance plan to the federal government. This Annual Program Plan (APP) "serves as the basis for all the activities the States will subsequently carry out" (Califano, et al., 1979, p. 72).

Great controversy arose when P.L. 94-142 became law. Most advocates praised it as the ultimate civil rights bill for handicapped children while critics believed it to be the high point of federal intrusion into education which should be the domain of the state and local governments (Savage, 1977). All states except New Mexico chose to submit a state plan and receive P.L. 94-142 funds; and many, such
as Michigan, modified existing state legislation to match or closely match P.L. 94-142. At the time P.L. 94-142 became law, U.S. Commissioner of Education, Terrell Bell, publicly stated that many aspects of this piece of legislation would be "difficult to administer" (Cronin, 1976, p. 500). For special education administrators, implementing the necessary procedures to comply with the mandates of P.L. 94-142 became "almost a full time job in itself" (Simpson & Lamb, 1979, p. 77). The role of a special education administrator appears to have been changed from that of a developer and programmer, as seen during the years of permissive education, to that of monitor and defender of the SEA, IEU, or LEA service delivery system as required by mandatory special education (Lamb & Burrello, 1979).

The federal government's responsibilities first involved the delineation of standards and minimum expectations in order for SEAs, IEUs, and LEAs to receive P.L. 94-142 funds (Galloway, Schipper, & Wilson, 1979). A second responsibility of OSOE, delegated to the BEH, was to be accountable for monitoring SEA's expenditure of federal funds as defined in Section 612 of P.L. 94-142. This required BEH to review and approve IEU or LEA Annual Program Plans. "Each level is responsible for complying not only with its own laws and policies, but also with those of the next higher levels from which it derives authority or funding" (Galloway et al., 1979, p. 1).

Although each individual state's approach to monitoring appeared to be independent of any other, two major areas had to be taken into account when designing a monitoring system: "the content of the monitoring or what . . . [had] . . . to be monitored, and the
elements of the system or the process of monitoring—when, where, by whom, what method, and in what order" (Galloway et al., 1979, p. 1).

BEH developed the following four components with its own basic monitoring procedure: "(1) the review of each States Annual Program Plan, (2) program reviews conducted within the states, (c) procedures for processing complaints, and (4) procedures for responding to requests for waivers" (Califano et al., 1979, p. 72).

During the 1976-77 on-site program review of state efforts to comply with the rules and regulations of P.L. 94-142, BEH evaluated 30 program review variables. These variables were:

1. Submission of annual program plan
2. Right to education policy
3. Full education opportunity goal
4. Priorities
5. Child identification, location, and evaluation
6. Individualized education program
7. Procedural safeguards
8. Confidentiality
9. Least restrictive environment
10. Protection in evaluation procedures
11. Comprehensive system of personnel development
12. Participation of private school children
13. Placement in private school
14. SEA responsibility for all educational programs
15. Program monitoring
16. Program evaluation
17. Reporting

18. Child count

19. Administration of funds by SEA

20. Administration of funds by LEA

21. State advisory panel

22. State agency eligibility to participate under P.L. 89-313

23. Flexibility of children to receive benefits

24. Children transferred to LEAs from state-operated programs

25. Measurable project goals and objectives

26. Evaluation of education achievement of participating children

27. Project monitoring and technical assistance

28. Dissemination of project findings

29. Distribution of funds among eligible schools and children.

30. Use of funds to supplement and not supplant (Califano et al., 1979, p. 75)

The results of monitoring visits assist federal officials in the verification that programs are in compliance with P.L. 94-142 and state laws. Ideally, monitoring results indicate if, and to what extent, educational programs are meeting existing goals and objectives. This information can be used to identify areas where the LEAs and SEAs need technical assistance to overcome problems within their delivery systems. The actual field use of a monitoring system exposes any procedural problems of the system that need to be corrected. Based on monitoring information, special education
planning can be enhanced at various local, regional, state, and national levels (Galloway et al., 1979).

Several factors can cause compliance plans to be delayed or diluted to the point of not being effective. Prehm and MacDonald (1979) have identified six factors that may negatively affect efforts to achieve compliance:

1. Not everyone supports the right to education principle.

2. Attitudinal problems toward the handicapped are ever present.

3. Teacher associations are not always enthusiastic about mainstreaming and its implications.

4. Teachers are becoming vocal about the lack of adequate funding and resources needed to teach exceptional children and/or maintain mainstreaming programs.

5. Preservice and inservice training programs have not prepared regular or special educators for their emerging roles.

6. Support for many programs is decreasing because of the accompanying problems and bureaucratic paper chase. (Prehm & MacDonald, 1979, p. 506)

The declining availability of financial resources and the attitude that compliance does not have a positive effect on the special education classroom, the handicapped children served, or the teachers involved are additional obstacles about which professionals must be aware of when developing a compliance monitoring system.

The federal government has the obligation to withhold P.L. 94-142 funds if an SEA is in substantial noncompliance with its own Annual Program Plan. An SEA may withhold federal funds if an IEU is not in compliance with its Annual Program Plan and stop the flow of
federal funds; not only P.L. 94-142 funds but also funds for the following programs:

1. Part A of Title I of the Elementary and Secondary Education Act

2. Title III of the Elementary and Secondary Education Act (innovative programs) and its successor, Part C, Educational Innovation and Support, Section 431 of P.L. 93-380

3. The Vocational Education Act (Ballard & Zettel, 1978, p. 460)

If a SEA, IEU, or LEA fails to comply with Section 504 of the Rehabilitation Act of 1973 (P.L. 93-112) the Secretary of Education may cut off all Department of Education funds (Ballard & Zettel, 1978).

The Role and Responsibilities of Michigan's Coordinator of Planning, Monitoring, and Data Collection

Michigan's Reorganization Efforts

In 1975, Michigan's State Director of Special Education noted several fundamental changes affecting the SEA due to the state mandatory special education law, P.A. 198, and the federal law, P.L. 94-142. It was believed these new laws required different SEA staff skills, knowledges, and attitudes (Burrello & Sage, 1979). Michigan's Special Education Service Area (SESA), the state agency responsible for the education of handicapped students, had a new and different relationship with the IEUs and SEAs, one that required a partnership. Due to the increased amount of information processing demands within and outside SESA and the previously stated factors, a total reorganization effort resulted (Burrello & Sage, 1979).
Effective October 27, 1982, a second revised organizational model emerged with three major program divisions: Management Information and Finance Program; Regional Planning and Compliance Program; and Training, Curriculum, and Monitoring Program. Each of the programs contain several subunits.

The Monitoring Unit activities include monitoring by the use of data collection and on-site observation of program activities. Data from an IEU or LEA are compared with the established regulations and can be used as a problem indicator (see Figure 1). The Monitoring Unit also conducts on-site reviews of IEUs and LEAs (see Figure 2). This on-site visit is followed by a preliminary report, an IEU response, and a final report by the SESA accompanied by an exit interview (see Figure 3). The final IEU monitoring reports are public documents and subject to the Freedom of Information Act (Parshall, 1982).

**Michigan's IEU Coordinator of Planning, Monitoring, and Data Collection**

In addition to fundamental changes affecting Michigan's SEA due to the state mandatory special education law, P.A. 198, and federal law, P.L. 94-142, IEUs and LEAs also were required to change their policies and procedures. One of the most specific changes, due to the increased manpower necessary to comply with these new rules and regulations, was the creation of a position in each IEU known as the Coordinator of Planning, Monitoring, and Data Collection. In 1977, Michigan's first Annual Program Plan was approved by BEH for the
Establish Parameters for Program Data

Establish/Identify Appropriate Data Sources

Establish Data Collection Cycle and Collect Data

Compare Data to Parameters

Data Within Parameters
  No Follow-Up Required

Data Outside Parameters
  Check Accuracy of Data
    Initiate Follow-Up Activities


Figure 1

Monitoring Through Data Collection Flow Chart
Monitoring Staff Makes Preliminary Arrangements With Superintendent or Designated Contact Person

On-Site—Monitor(s) Report to Superintendent or Designated Contact Person

Monitor Program or Activity

Exit Interview When Appropriate

Within 30 Days

Monitoring Report to Superintendent—Copy to Contact Person

No Problems

No Follow-Up Activities Required

No Corrective Action—Service Area Director May Halt Flow of Funds

Recipient May Use Contested Decision Procedures

Moderate Problems

30-60 Days for Corrective Action

Corrective Action Taken—Matter Closed

Serious Problems

Service Area Director Notify Superintendent in Writing

Action—Request Refund or Cancel Program Approval

Recipient May Use Contested Decision Procedures


Figure 2
On-Site Monitoring Flow Chart

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State Review

→ Preliminary Report

→ 30 Days

→ IEU Response

→ amendments if any

→ 14 Days

→ Final Report & Exit Interview

Divided into Two Paths:

- **Disagree**
  - 30 Days
  - Request for MDE Review including specific objectives with rationale
  - 30 Days
  - Director's Review
  - 28 Days
  - Associate Superintendent Review

- **Agree**
  - 30 Days
  - Proof of Compliance Meeting(s) and Compliance Plan
  - 14 Days
  - Close Out Letter
  - Follow-Up


Figure 3

State Review Procedures
1977-78 fiscal year. Within this 1977-78 APP, Michigan applied for and received P.L. 94-142 flowthrough funds authorizing a CPMDC position for each Michigan IEU. The SESA perceived the CPMDC position "as being vital to the ongoing implementation of P.L. 94-142" (Parshall, 1982, p. 1).

Individuals holding the CPMDC position are responsible for the seven activities which were presented previously (see pages 2-3) and have no other additional supervision or administrative tasks to perform. The CPMDC reports to the IEU director of special education (Parshall, 1982).

One of the responsibilities of individuals holding the CPMDC position is to develop procedures for monitoring the IEU plan. By 1978, four approved monitoring models were developed and in use (Kalamazoo, Macomb, Clinton, and state models). Based upon the 1978 federal review which cited Michigan for not having a statewide monitoring model and an additional 1980 citation contending the state did not have a model that impacted on handicapped children, the present single Michigan Monitoring Model emerged (Parshall, 1982).

The Michigan Monitoring Model assumes the following:

1. The most useful monitoring systems will be those that have consistent standards and monitoring components across the involved levels (local, intermediate, state, federal).

2. Those levels being monitored should know the standards against which their organization and practices are being compared.

3. The purpose of monitoring is not to uncover programs that are out of compliance, but to identify areas in need of improvement.
4. Monitoring procedures must apply to educational programs for all handicapped persons regardless of the setting in which they are delivered, including all public agencies.

5. Monitored programs have a right to technical assistance when meeting minimum standards.

6. Administrators of educational programs at all levels want to comply with minimum standards and wish to establish standards beyond the minimum.

7. Monitoring procedures and the information gained through the reviews are useful not only to the monitoring agent, but to the agent being monitored.

8. One of the most valuable outcomes of monitoring is that it aids the monitored agency through a self-improvement process. (Birch et al., 1981, pp. 2-3)

Michigan monitoring standards assist in identifying the minimal operational level at which an IEU and LEA must perform when providing a special delivery system (Birch et al., 1981). These standards are a functional tool for the purpose of conducting an on-site IEU or LEA review. First, a specific rule is restated and, if necessary, broken down into its component parts. Second, the criteria for meeting each standard is defined at the minimal level of acceptance. Third, the written documentation required to be acceptable as proof of compliance is identified. Fourth, the corrective action needed in order to achieve compliance when a standard is out of compliance is provided.

Individuals holding the position of CPMDC perform all the IEU administrative responsibilities for monitoring and data collection activities mandated by P.L. 94-142 and P.A. 198. These responsibilities include both monitoring LEAs and their own IEUs, and Title VI applications (Parshall, 1982). The reputation of an IEU and its...
ability to provide a free appropriate public education for special education students is directly linked to the effectiveness of the CPMDC. The question can be raised that the tasks and the amount of time the CPMDC spends performing these tasks may be related to the effectiveness of an IEU in achieving legal compliance.

Task Identification and Task Analysis

Task Identification

An analysis of the CPMDC position is needed in order to better understand this role. Typically, "job analysis" is a phrase used to describe the process by which the duties, requirements, and conditions are delineated from the whole. The final product of a job analysis is usually a job description (Anderson, Ball, & Murphy, 1975).

The purpose of identifying the tasks of individuals holding CPMDC positions is to provide a statement of the requirements of the position known as a task description (Miller, 1962). The overwhelming majority of previous educational and noneducational investigations concerning the analysis of positions begin with 5 to 12 established duties or tasks which are broken down into subtasks. Task identification techniques are used to deal with task complexity and the delineation of tasks from the whole (D. W. Brinkerhoff & Kanter, 1980). A variety of methods have been employed in order to identify and list the tasks in which an individual engages while performing a job. These methods have been reviewed in order to determine which...
method would best facilitate the identification and analysis of the
tasks individuals holding CPMDC positions are required to perform.
Methods for determining job related tasks include questionnaires,
interviews, observations, diaries, and the opinion of experts in the
area (Anderson et al., 1975).

**Questionnaires.** Questionnaires are most helpful when attempting
to measure attitudes, values, opinions, and to obtain demo-
graphic information (Haller, 1979). Unstructured questionnaires re-
quire the employee to have both the desire and the expressive writ-
ing skills necessary to convey the demands of the position to the
reader (Anderson et al., 1975). Structured questionnaires require
preliminary preparation and are usually formed with the assistance
of a secondary source such as an expert in the area of the job being
analyzed (Anderson et al., 1975). An advantage of the questionnaire
approach when used in identifying a position's tasks is that data
can be generated inexpensively (Babbie, 1975; Haller, 1979); a dis-
advantage is that the response rate of a questionnaire decreases as
the complexity of the questionnaire increases (Babbie, 1975; Petry,
1976). This disadvantage of questionnaires, that is, a decrease in
response as complexity increases, is an important consideration when
attempting to determine a method to identify the tasks required of
an individual performing the tasks of a CPMDC as this position is
generally considered by special education administrators as complex.

**Interviews.** Interviews generally attain a higher rate of re-
response when compared to questionnaires (Babbie, 1975). Interviews
generally provide more information about the tasks within a job when compared to questionnaires (Anderson et al., 1975). Interviews, as is true of questionnaires, range from unstructured, or what is sometimes referred to as open-ended, to structured. Unstructured interviews are generally an informal discussion of the position's tasks (Nelson, Bechtol, & Johnson, 1977). Structured interviewing, as with the structured questionnaire approach, requires the construction of the questions to be asked, usually with the assistance of an expert, prior to contacting the employee.

Upon reviewing the literature, the structured interview approach would appear to have advantages over an unstructured approach concerning this investigation for the following reasons:

1. Structured interviewing allows the same question to be asked to a variety of individuals for comparative purposes (Nelson et al., 1977; Stewart & Cash, 1974).

2. The interview is controlled and, in the broadest sense, standardized (Nelson et al., 1977; Stewart & Cash, 1974).

3. This control allows for the data to be more readily analyzed (Nelson et al., 1977).

4. Structured questions require the interviewee to conceptualize and provide an answer with substance (Pellicer, 1981).

A disadvantage of structured interviews, when compared to unstructured interviews is that the structured approach does not lend itself for probing the interviewee's responses with additional questions related directly to the interviewee's initial answer (Stewart & Cash, 1974).
When using interviews as instruments for data collection, interviewers should refrain from affecting or biasing the data. Data can be adversely affected if the interviewee perceives himself to be in some kind of difficulty (Dillon, 1979). An interviewer can bias a structured interview by deviating from the established format or revealing too much information about the study (Tuckman, 1978). One of the essential attributes of an interviewer is the ability to remain neutral when asking sensitive questions (Babbie, 1975).

Observation. Observation is another method that can be used to determine specific job related tasks. Three general types of observations include: process observation, participant observation, and lurking. Process observation involves the recording of tasks involved in a job that can be observed without interference (Nelson et al., 1977). Participant observation requires an individual to assume the actual role or job. Lurking is an informal combination of process and participation observation. The individual blends into the setting casually (Nelson et al., 1977). A disadvantage concerning observation techniques is that the more complex the job, the more difficult it becomes to record, compare, and replicate the data collected.

Additional techniques. Additional techniques used to identify and list the tasks required in order to perform the duties of a position include diaries and expert opinion. Diaries written by employees themselves provide information based on the interest the employee has in a study and the time available to make entries.
(Anderson et al., 1975). A secondary opinion of an expert can be secured. The quality of information an expert will provide is based on the extent this person understands the tasks required to be performed and how recently this knowledge became acquired (Anderson et al., 1975).

**Task Analysis**

Following the identification of tasks, the next step in obtaining more information about a position such as the CPMDC is to determine how an employee performs these tasks (McGehee & Thayer, 1961). This systematic study of the behavioral requirements of tasks is known as task analysis. According to Davis, Alexander, and Yelon (1974), the two most common procedures used to collect information on how an employee performs tasks include the techniques specified previously, that is, interviews and direct observation. "One of the best ways to find out how a task is performed is to talk to the people who know how to do it" (Davis et al., 1974, p. 143). The number of interviewees should increase in relationship to the greater complexity of the task being analyzed (Davis et al., 1974). Direct observation usually occurs in conjunction with interviews (Davis et al., 1974).

**Conclusion**

There are no fixed procedures for determining the characteristics and requirements of tasks, but rather the format of task analysis should be based on the nature of the task (Kaufman, 1972).
Based on the review of literature, it would appear that the nature and complexity of the tasks required of an individual holding the CPMDC position may be best identified and analyzed through the use of structured interviews.

Summary

Federal involvement in special education resulted from litigation brought on behalf of handicapped children not receiving a free appropriate education. This federal involvement brought an end to permissive special education. Recent mandatory legislation required public schools to provide special education programs and related services. Mandatory special education in Michigan caused the creation of a new position known as the Coordinator of Planning, Monitoring, and Data Collection. A fundamental assumption concerning the reasons for monitoring is that when an IEU or LEA is in legal compliance, the effectiveness of programming increases (Howe, 1981). A question has been raised about the possibility that the tasks and the amount of time an individual holding the position of CPMDC spends performing these tasks may be related to the effectiveness of an IEU in achieving legal compliance.

In order to make decisions related to the CPMDC position, the identification and analysis of tasks required of an individual holding this position would appear to be necessary. Various procedures of collecting this information such as questionnaires, interviews, observations, diaries, and expert opinion have been reviewed. There are not fixed procedures for collection of such data, as the format...
is most efficient when matched with the nature and complexity of the tasks. In this investigation concerning CPMDC positions, it would appear that the structured interviews will best serve as the procedure used for identifying and analyzing appropriate tasks.
CHAPTER III

METHODS AND PROCEDURES

The fundamental purpose of this investigation is to provide information regarding the importance of and time spent engaging in seven key activities so that decisions related to the position of Coordinator of Planning, Monitoring, and Data Collection may be based on data rather than opinion. In order to accomplish this purpose, the following methods and procedures were implemented:

1. The Michigan State Director of Special Education, Dr. Edward L. Birch, was requested to provide a list of five individuals considered to be experts in the area or directly related area of special education planning, monitoring, and data collection. The following individuals were recommended:

   Mr. Larry L. Campbell, Assistant Superintendent for Special Education, St. Joseph County Intermediate School District, Centreville, Michigan.


   Dr. Lucian Parshall, Consultant, Management Information and Finance Program, Special Education Services Area, Michigan Department of Education, Lansing, Michigan.

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Dr. Gene D. Thurber, Director of Special Education, Kent Intermediate School District, Grand Rapids, Michigan.

2. Upon agreeing to be a jury member for this investigation, each of the five members were asked to complete the following:
(a) determine the appropriateness of seven activities that are believed to be representative of the tasks related to the CPMDC position; these activities were quoted directly from the Amended Annual Program Plan for Fiscal Years 1981-83, (b) provide an answer to the question "Could an individual holding a CPMDC position prioritize these seven activities in rank order as to the importance of each activity accurately?" (c) provide an answer to the question, "Could an individual holding a CPMDC position rank these seven activities in order as to the time spent concerning each activity accurately?" (d) if an activity is determined to be inappropriate, specify alternative recommendations, (e) provide any appropriate additional recommendations (see Appendix A, Jury Instructions and Response Form).

The results of the jurying procedure indicate that the majority of the jury members, four to one, believed that all seven CPMDC activities were appropriate. The majority of the jury members also reported that individuals holding the position of CPMDC could correctly prioritize these seven activities in rank order as to the time spent concerning each activity (see Appendix B, Results of Jury Member Questionnaire).

3. The Michigan State Director of Special Education, Dr. Edward L. Birch, approved a written request for access to all IEU Final Monitoring Reports.
4. Based on the review of these reports, the investigator ranked each Michigan IEU in order from least to most negative SEA citations received. Because there was a cluster of IEUs with a low number of citations and another cluster of IEUs with a high number of citations, the investigator decided that these two clusters of IEUs would be used as groups.

5. The investigator developed a structured interview format and field tested this format in two IEUs not designated to be part of the investigation. Based on this field test, any necessary format revisions were made and a final structured interview format established (see Appendix C, CPMD Interview Format).

6. The investigator secured written permission to interview 20 individuals holding CPMD positions. The IEUs in which the CPMD were to be interviewed were selected in the following manner:
   (a) the IEU director of special education had made a positive response to a letter requesting the participation of the IEU's Coordinator of Planning, Monitoring, and Data Collection in the investigation; (b) the Coordinator of Planning, Monitoring, and Data Collection had served in that position for one school year prior to the state monitoring visit; (c) the SESA had conducted a monitoring visit between January 1, 1980, and December 30, 1982; (d) from the 57 IEUs in Michigan, the first 10 IEUs that met the criteria with the least number of SESA negative citations which agreed to participate were selected for the investigation; (e) from the 57 IEUs in Michigan, the first 10 IEUs that met the criteria with the greatest number of SESA negative monitoring citations which agreed to
participate were selected for the investigation (see Appendix D, Letter Requesting Participation and Response Form).

7. The investigator collected the data after arranging a mutually convenient appointment with each IEU's CPMDC. Interviews were conducted at the IEU's central office during April and May, 1983.

8. Using an ex post facto design, specifically, the co-relational technique, the investigator attempted to determine if any pattern or patterns emerged relating to the ranking as to time spent on the seven CPMDC activities and the number of SESA negative monitoring citations within the two groups.

9. Using an ex post facto design, specifically, the co-relational technique, the investigator attempted to determine if any pattern or patterns emerged between the rank order of importance of the seven CPMDC activities and the number of SESA negative monitoring citations within the two groups.

The Co-relational Procedure

An ex post facto design is appropriate when an investigator desires to examine "a naturally occurring treatment after the treatment has occurred" (Tuckman, 1978, p. 147). Kerlinger (1973) noted that "educational research problems do not lend themselves to experimentation, although many do lend themselves to controlled inquiry of the ex post facto kind" (p. 392). Within the group of ex post facto designs, the co-relational procedure involves two sets of data from a sample in order to determine a relationship between
the sets of data (Tuckman, 1978). Based on the results of a co-
relational procedure, one may be able to establish a predictive re-
relationship between certain variables (Tuckman, 1978). However, an
investigator should not attempt to determine a causal relationship
between variables, as ex post facto research is limited in the sense
that many explanations may be plausible when dealing with complex
educational events (Kerlinger, 1973).

The dependent variables in this investigation were the priori-
tization of the CPMDC seven activities as to the time spent comple-
ing each activity in rank order and the activity's perceived impor-
tance. The independent variable was the relative success the
CPMDCs have in reducing negative SESA monitoring citations. Those
variables which have been attempted to be neutralized or controlled
variables were: (a) current final reports instead of dated reports,
and (b) length of time as a CPMDC. The investigator speculated that
the following hypotheses would be accepted.

Hypothesis 1. There is an association as to the importance of
the activities within the low citation CPMDC group.

Hypothesis 2. There is an association as to the importance of
the activities within the high citation CPMDC group.

Hypothesis 3. There is an association as to the time spent
engaging in the activities within the low citation CPMDC group.

Hypothesis 4. There is an association as to the time spent
engaging in the activities within the high citation CPMDC group.
CHAPTER IV

RESULTS

The present investigation was concerned with the differences between two groups of Coordinators of Planning, Monitoring, and Data Collection on the importance of activities and the time spent carrying out the activities. Participants of the study were grouped based on criteria which included being employed by the 10 IEUs with the least number of SESA negative citations and those employed by the 10 IEUs with the most citations. The results of the investigation are presented in the following order:

1. Results of the CPMDC Interview Format field test.

2. An analysis of the background information regarding the two groups.

3. The presentation of Kendall's Coefficient of Concordance.

4. Results of the comparison within the two groups concerning the perceived importance of activities.

5. Results of the comparison within the two groups concerning how time was spent performing activities.

6. Results of the comparison within the two groups concerning additional activities engaged in during the school year.

7. Results of additional activities which should be engaged in but are not during a school year.

8. Results of the comparison within the two groups concerning the most important activity to engage in to reduce the number of negative citations.
The Interview Format Field Test

The CPMDC Interview Format was field tested in two IEUs, one a rural and the other a metropolitan IEU. Following the field test revisions in the CPMDC Interview Format were made in the directions and the scoring key for ranking the seven activities and by the addition of Question 5. The field test also enabled the investigator to refine his interviewing techniques and procedures. The investigator believes the field test accomplished all needed revisions and refined his interviewing skills.

Background Information

The two groups in this investigation shall be referred to as the low group and the high group. The members of the low group are CPMDCs in IEUs having the least number of SESA negative citations while the high group received the most number of SESA negative citations. All eligible IEUs chose to participate in this investigation. Of the 20 interviews, 19 were conducted at the participant's IEU office. One interview was conducted at the Kalamazoo Public Library due to the distant geographic location of the IEU and at the request of the CPMDC.

The low group had a total of 363 negative SESA citations with a mean of 36.3 and a range of 4-54. Within the low group there was a total of 60 constituent local school districts in the IEUs with a mean of six local school districts per IEU and a range of three to eight districts. Based on information reported by each IEU, the low
group served a total of 8,738 handicapped students with a mean of 874 handicapped students and a range of 250-1,857.

The high group had a total of 4,331 negative SESA citations with a mean of 433 and a range of 151-955. Within the high group there was a total of 161 constituent local school districts with a mean of 16.1 districts per IEU and a range of 3-29. Again, based on information reported by each IEU, the high group served a total of 73,385 handicapped students with a mean of 7,338.5 handicapped students enrolled per district and a range of 160-37,000. The two groups differed in that IEUs among the high group have a number of additional constituent local school districts within their boundaries and serve more handicapped students. In general, the high group IEUs were located in metropolitan areas of Michigan and the low group could be considered to be rural in nature.

Appendix C, CPMDC Interview Format, has all activities and sub-activities numbered in order to provide the reader with the content of the activity and subactivity. For the purpose of explanation, the following terms are used to represent the various activities.

Activity 1: Registry
Activity 2: Reporting
Activity 3: Title VI
Activity 4: PAC
Activity 5: State Plan
Activity 6: Compliance
Activity 7: Professional Improvement

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In order to determine the extent to which the participants of the low and high groups tended to be similar, or show concordance in rank ordering, Kendall's statistic, \( W \), the "coefficient of concordance" was used. The "idea of the extent of variability among the respective sums of ranks is the basis for Kendall's \( W \) Statistic" (Hays, 1973, p. 802). Basically,

\[
W = \frac{\text{variance of rank sums}}{\text{maximum possible variance of rank sums}}.
\]

Kendall's Coefficient of Concordance can be used with three or more sets of ranks (Downie & Heath, 1974). A perfect agreement, or concordance, would be one and absolutely no agreement would be zero. \( W \) cannot be negative (Hays, 1973). Sufficiently large values of \( W \) require the investigator to accept the positive hypothesis of association at specific probability levels (Daniel, 1978). For the purpose of this investigation, the probability level of .10 of accepting a false hypothesis was selected prior to the collection of data.

The Perceived Importance of Activities

**Low Group**

There is apparently a moderately high degree of concordance among the low group regarding the importance of activities (\( W = .62, \% \text{ of Agreement} = 62\% \)) as seen in the fact that the low group viewed Activity 2 (Reporting), Activity 3 (Title VI), and Activity 6 (Compliance) as being most important. Based on this statistical result
(\(W = 62\%\)), the hypothesis that there is an agreement or association as to the importance of the activities among the members of the low group can be accepted. The probability that the results occurred by chance is .001%.

**Most important activities.** The two most important activities as perceived by members of the low group are presented on Table 1. It can be seen that the greatest number of first and second choices were for Activities 2, 3, and 6. Further analysis of the subactivities within Activities 2, 3, and 6 (most important) are presented in Figure 4 and Appendix E. The data indicate that while there is agreement among the members of the low group regarding the importance of major activities, there was not agreement concerning the importance of subactivities within activities.

<table>
<thead>
<tr>
<th>Activity</th>
<th>(W)</th>
<th>% Agreement</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>.15</td>
<td>15%</td>
<td>low agreement</td>
</tr>
<tr>
<td>3</td>
<td>.28</td>
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<td>low agreement</td>
</tr>
<tr>
<td>6</td>
<td>.31</td>
<td>31%</td>
<td>low agreement</td>
</tr>
</tbody>
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**Figure 4**

Analysis of Subactivities Within Activities 2, 3, and 6 Among the Low Group

**Least important activities.** The two least important activities as viewed by members of the low group are presented on Table 2. The low group agreed that Activity 5 (State Plan) and Activity 7 (Professional Improvement) were least important. Additional analysis of
**Table 1**

Most Important Activities as Perceived Among the Low Group
(Number 1 being most important and number 2 being second most important activity)

<table>
<thead>
<tr>
<th>Activities</th>
<th>Frequency</th>
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<tbody>
<tr>
<td>Registry</td>
<td>1</td>
</tr>
<tr>
<td>Reporting</td>
<td>2</td>
</tr>
<tr>
<td>Title VI</td>
<td>2</td>
</tr>
<tr>
<td>PAC</td>
<td>1</td>
</tr>
<tr>
<td>State Plan</td>
<td>2</td>
</tr>
<tr>
<td>Compliance</td>
<td>1</td>
</tr>
<tr>
<td>Professional Improvement</td>
<td>1</td>
</tr>
</tbody>
</table>

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Table 2

Least Important Activities as Perceived Among the Low Group
(Number 7 being least important and number 6 being second least important activity)

<table>
<thead>
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<td>Registry</td>
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<td>Reporting</td>
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<tr>
<td>Title VI</td>
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<td>PAC</td>
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<tr>
<td>State Plan</td>
</tr>
<tr>
<td>Compliance</td>
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<tr>
<td>Professional Improvement</td>
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</tbody>
</table>

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the subactivities within Activity 7 (least important) was possible and, although there was agreement among the members of the low group regarding the importance of major activities, there was not agreement concerning the importance of subactivities within Activity 7 as seen in Figure 5. Further analysis of subactivities are presented in Appendix F.

<table>
<thead>
<tr>
<th>Activity</th>
<th>W</th>
<th>% Agreement</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>(only two subactivities in Activity 1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>(only one subactivity in Activity 5)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>.36</td>
<td>36%</td>
<td>moderately low</td>
</tr>
</tbody>
</table>

Figure 5
Analysis of Subactivities Within Activities 1, 5, and 7 Among the Low Group

High Group

The data indicate a low degree of agreement or concordance among the high group regarding the importance of activities (\(W = .2,\) % of Agreement = 20%). According to this statistical information, the hypothesis that there is an association or agreement as to the importance of the activities among the members within the high CPMDC group cannot be accepted and is therefore rejected. The probability that the results occurred by chance is .005%.
Most important activities. The two most important activities among the high group, presented on Table 3, illustrate a spread across several activities. Specifically, the high group did not view Activity 2 (Reporting) as being of the importance that the low group believed it to be in relationship with all other activities.

Further analysis of the subactivities within Activities 2, 3, and 6 (most important) are presented in Figure 6. There was extremely low agreement among the subactivities of Activity 2 (Reporting), moderately low agreement in the subactivities of Activity 3 (Title VI), and average agreement in the subactivities of Activity 6 (Compliance).

<table>
<thead>
<tr>
<th>Activity</th>
<th>W</th>
<th>% Agreement</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>.01</td>
<td>1%</td>
<td>extremely low</td>
</tr>
<tr>
<td>3</td>
<td>.36</td>
<td>36%</td>
<td>moderately low</td>
</tr>
<tr>
<td>6</td>
<td>.47</td>
<td>47%</td>
<td>average</td>
</tr>
</tbody>
</table>

Figure 6
Analysis of Subactivities Within Activities 2, 3, and 6 Among the High Group

A more in-depth analysis of subactivities within Activities 2, 3, and 6 (most important) are presented in Appendix G.

Least important activities. The two least important activities, as viewed by the members of the high group, are presented on Table 4. When compared with the low group, the members of the high group can be seen to be much more evenly dispersed among Activities 1, 2, 4,
Table 3

Most Important Activities as Perceived Among the High Group
(Number 1 being most important and number 2 being second most important activity)
Table 4
Least Important Activities as Perceived Among the High Group
(Number 7 being least important and number 6 being second least important activity)

<table>
<thead>
<tr>
<th>Frequency</th>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>Registry</td>
</tr>
<tr>
<td>9</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td></td>
</tr>
</tbody>
</table>

Activities

Registry  Reporting  Title VI  PAC  State Plan  Compliance  Professional Improvement
5, 6, and 7. Figure 7 indicates that there is slightly above average agreement among the subactivities of Activity 7 (Professional Improvement). Additional analysis of subactivities within Activities 1 and 7 (least important) are presented in Appendix H.

<table>
<thead>
<tr>
<th>Activity</th>
<th>W</th>
<th>% Agreement</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>.57</td>
<td>57%</td>
<td>slightly above average</td>
</tr>
</tbody>
</table>

(only two subactivities in Activity 1)
(only one subactivity in Activity 5)

Figure 7

Analysis of Subactivities Within Activities 1, 5, and 7 Among the High Group

In summary, the results of the perceived importance of activities would seem to suggest that the low CPMDC group has a much clearer perspective of what they view as important activities. In contrast, the members of the high CPMDC group appear to be more divided and not in agreement when viewing the importance of required activities.

How Time Was Spent Performing Activities

Low Group

The data indicate that there is apparently a moderately high degree of concordance among the low group regarding how time was
spent performing activities ($W = .61$, % of Agreement $= 61\%$). Based on this information, the hypothesis that there is an agreement or association as to the time spent engaging in the activities within the low group can be accepted. The probability that the results occurred by chance is $.001\%$.

**Greatest amount of time spent.** The members of the low group reported that they spent the greatest amount of time engaging in Activities 6 (Compliance), 3 (Title VI), and 2 (Reporting). The pattern that emerges as displayed on Table 5, concerning the rank ordering of time spent engaging in required activities, closely matches the perceived importance of the same activities (see Table 1). Further analysis of Subactivities 3 (Title VI) and 6 (Compliance) indicates a lack of agreement among the members of the low group as to time spent engaging in these subactivities (see Figure 8 and Appendix I).

<table>
<thead>
<tr>
<th>Activity</th>
<th>W</th>
<th>% Agreement</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>.01</td>
<td>1%</td>
<td>extremely low</td>
</tr>
<tr>
<td>6</td>
<td>.1</td>
<td>10%</td>
<td>low</td>
</tr>
</tbody>
</table>

**Figure 8**

Analysis of Subactivities Within Activities 3 and 6 Among the Low Group

**Least amount of time spent.** As seen in Table 6, members of the low group spent the least amount of time on Activity 5 (State Plan) and Activity 7 (Professional Development). Again, there is a
Table 5
Most Time Spent Performing Activities
Among the Low Group
(Number 1 being most time spent and number 2 being second most time spent activity)
Table 6
Least Time Spent Performing Activities
Among the Low Group
(Number 7 being least time spent and
number 6 being second least
time spent activity)

Activities

Frequency
pattern in Tables 2 and 6 in that the results of the perceived least importance of and least time spent engaging in activities among members of the low group are quite similar, in fact, almost identical. Additional analysis of the subactivities within Activity 7 (Professional Improvement) suggests an extremely high agreement among members of the low group (see Figure 9 and Appendix J).

<table>
<thead>
<tr>
<th>Activity</th>
<th>W</th>
<th>% Agreement</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>(only two subactivities in Activity 1)</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>.84</td>
<td>84%</td>
<td>extremely high agreement</td>
</tr>
</tbody>
</table>

Figure 9

Analysis of Subactivities Within Activities 1 and 7 Among the Low Group

High Group

In contrast to the low group, there is apparently a moderately low degree of agreement among the high group regarding how time was spent performing activities (W = .36, % of Agreement = 36%). Based on this result, the hypothesis that there is agreement or an association as to the importance of the activities among members within the high CPMDG group cannot be accepted and is therefore rejected. There is not an agreement as to the time spent engaging in the activities within the high CPMDG group. The probability that the results occurred by chance is 2%.
Greatest amount of time spent. Table 7 provides the reader with a graphic display of the spread among the members of the high group. The members of the high group indicate that they spent their time differently when compared with each other and with the low group as evidenced by the spread seen in Table 7 and the concentration seen in Table 5. The members of the high group do not engage in Activity 2 (Reporting) as often as the low group members. Further analysis of the subactivities within Activities 3 (Title VI) and 6 (Compliance) indicates low agreement among members of the high group in these areas (see Figure 10 and Appendix K).

<table>
<thead>
<tr>
<th>Activity</th>
<th>W</th>
<th>% Agreement</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>.19</td>
<td>19%</td>
<td>low agreement</td>
</tr>
<tr>
<td>6</td>
<td>.14</td>
<td>14%</td>
<td>low agreement</td>
</tr>
</tbody>
</table>

Figure 10

Analysis of Subactivities Within Activities 3 and 6 Among the High Group

Least amount of time spent. The two activities which required the least amount of time among the high group are presented on Table 8. Again, CPMDCs in the high group do not agree as to which activities require the least amount of time and here the reader will note the greatest spread among the members of the high group. Analysis of subactivities within Activity 7 among the high group indicates near average agreement (see Figure 11 and Appendix L).
Table 7
Most Time Spent Performing Activities
Among the High Group
(Number 1 being most time spent and
number 2 being second most
time spent activity)

<table>
<thead>
<tr>
<th>Activities</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registry</td>
<td>1</td>
</tr>
<tr>
<td>Reporting</td>
<td>1</td>
</tr>
<tr>
<td>Title VI</td>
<td>2</td>
</tr>
<tr>
<td>PAC</td>
<td>2</td>
</tr>
<tr>
<td>State Plan</td>
<td>1</td>
</tr>
<tr>
<td>Compliance</td>
<td>1</td>
</tr>
<tr>
<td>Professional Improvement</td>
<td>1</td>
</tr>
</tbody>
</table>

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Table 8

Least Time Spent Performing Activities Among the High Group
(Number 7 being least time spent and number 6 being second least time spent activity)

<table>
<thead>
<tr>
<th>Activities</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registry</td>
<td>6</td>
</tr>
<tr>
<td>Reporting</td>
<td>6</td>
</tr>
<tr>
<td>Title VI</td>
<td>7</td>
</tr>
<tr>
<td>PAC</td>
<td>7</td>
</tr>
<tr>
<td>State Plan</td>
<td>6</td>
</tr>
<tr>
<td>Compliance</td>
<td>7</td>
</tr>
<tr>
<td>Professional Improvement</td>
<td>6</td>
</tr>
<tr>
<td></td>
<td>7</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>Activity</th>
<th>W</th>
<th>% Agreement</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(only one subactivity in Activity 5)</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>.43</td>
<td>43%</td>
<td>near average agreement</td>
</tr>
</tbody>
</table>

Figure 11

Analysis of Subactivities Within Activities 5 and 7 Among the High Group

In summary, a visual comparison of all activities for the high and low groups is presented in Table 9. It can be seen that the results of the time spent engaging in certain required activities appears to indicate that the low CPMDC group differs from the high group. Activity 2 (Reporting) is an example. Members of the high group were more likely to spend a great deal of time engaging in Activities 4 (PAC) and 5 (State Plan) than members of the low group while members of the low group spent more time engaging in Activity 6 (Compliance) than members of the high group. The high group was more divided than the low group when asked to rank seven required activities according to the time spent engaging in them.

Additional Activities Performed

Additional information related to the four hypotheses of this investigation was obtained by asking the Coordinators of Planning, Monitoring, and Data Collection what major activities they had engaged in during the school year beyond the seven activities outlined in the 1981-83 Michigan Approved Annual Plan.
Low Group

The low group reported 22 additional activities and the high group reported 38 such activities. The members of the low group engaged in a mean of 2.2 additional activities with a range of 1-5.

High Group

The members of the high group had a mean of 3.8 additional activities with a range of 0-8.

The most commonly cited additional activity was collecting information for, writing, and editing the IEU Program Plan. A wide range of additional activities was noted (see Appendix M).

Additional Activities Which Should Be Performed But Are Not

Coordinators of Planning, Monitoring, and Data Collection were asked what additional activities they should be engaging in to fulfill their mission but for any reason were not. The most commonly cited additional activity mentioned dealt with direct interaction with political forces (e.g., LEA superintendents). However, it should be noted that the majority of participants within both the low and high groups expressed the opinion that there were no additional activities that should be engaged in beyond what they were presently performing at this time. Further information concerning this question can be located in Appendix N.
The Most Important Activity to Perform in Order to Reduce the Number of Negative Citations

As a result of the field test, Coordinators of Planning, Monitoring, and Data Collection were asked to put themselves into a hypothetical situation as a newly hired director of special education in an IEU with an unusually high number of negative SESA citations. CPMDCs were asked "What single activity would you request your CPMDC to engage in in order to reduce the number of negative citations during the next SESA monitoring visit?"

The most commonly expressed opinions among participants of both the low and high groups centered around directing their CPMDC to increase communication with LEAs in order to form more positive relations with superintendents, local special education coordinators, and teachers (low group = 5 responses; high group = 3 responses). Another response given by CPMDCs dealt with conducting LEA teacher and administrator in-service education sessions regarding rules, regulations, and forms (see Appendix 0).

Summary

A test of association, Kendall's Coefficient of Concordance, was applied to the data obtained from Coordinators of Planning, Monitoring, and Data Collection during IEU on-site interviews. The results indicate that the hypothesis regarding an association as to the perceived importance and time spent engaging in the seven required activities within the CPMDC group whose IEUs received the...
lowest number of SESA negative citations can be accepted. The low group appears to be in agreement as to the perceived importance of, and time spent engaging in, the seven activities. More specifically, Activities 2 (Reporting), 3 (Title VI), and 6 (Compliance) were most often reported to be important and time consuming by members of the low group.

In contrast to the hypothesis described above, the results indicate that the hypothesis regarding an agreement as to the perceived importance and time spent engaging in the seven required activities with the high CPMDC group was rejected. Members of the high group do not appear to be in agreement and are divided concerning the perceived importance and time spent engaging in the seven required activities. The high group does not appear to have a clear perspective of what is important or the amount of time to be spent engaging in the seven activities when compared to the low group.

For the purpose of further analysis, when possible, each sub-activity within the seven activities was also tested using Kendall's Coefficient of Concordance. Three additional open ended questions provided the investigator with additional information for the purpose of discussion.
The Education for All Handicapped Children Act (P.L. 94-142) requires school districts to document compliance with the law and its regulations. An assumption was made for the present study that a positive correlation exists between the degree an IEU is in legal compliance and the activities engaged in by Coordinators of Planning, Monitoring, and Data Collection (CPMDCs).

In Michigan, P.L. 94-142 funds were allocated to each IEU to support its Coordinator of Planning, Monitoring, and Data Collection position. Individuals holding CPMDC positions monitor the implementation of free appropriate public education programs for handicapped students. A review of the literature indicated that a better understanding of the relatively new CPMDC position is needed in order to provide information to decision makers and the best method for acquiring information consisted of on-site structured interviews.

The present investigation dealt with two groups: CPMDCs in 10 IEUs that met the criteria of having the least number of SESA negative citations (the low group) and 10 CPMDCs that met the criteria of having the most number of SESA negative citations (the high group). The investigator speculated that four hypotheses would be accepted in regard to the activities of the CPMDCs. In addition to the four hypotheses of this investigation which were tested on the
basis of data obtained from the CPMDC Interview Format, three additional questions were asked of the CPMDCs during the interview.

**Hypotheses Relating to Importance**

The first hypothesis, that there is an association as to the importance of seven activities within the low citation CPMDC group, was accepted. The results obtained from data indicate that the low group was in agreement as to the importance of seven required responsibilities outlined by SESA.

In contrast, the second hypothesis, that there is an association as to the importance of these same activities within the high citation CPMDC group, was rejected. The high group did not appear to be in agreement as to the importance of the major activities which they engaged in during a school year.

**Hypotheses Relating to Time Spent**

The third hypothesis, that there is an association as to the time spent engaging in the activities within the low citation CPMDC group, was accepted. The low group seemed to be in agreement concerning the amount of time spent engaging in the seven activities.

The fourth hypothesis, that there is an association as to the time spent engaging in the activities within the high citation CPMDC group, was rejected. There would seem to be no agreement as to how much time is spent engaging in the seven activities among the participants of the high group.
The high group participants engaged in several more activities in addition to the seven activities required by SESA when compared to the low group. The most commonly cited additional activity that should be engaged in but is not was direct interaction with political forces (e.g., LEA superintendents).

In order to reduce the number of negative SESA citations, participants of both groups most commonly expressed the opinion that CPMDCs need to have communication with professionals in LEAs increased in order to form more positive relations with superintendents, local special education coordinators, and teachers.

Assumptions and Limitations

The following is a discussion of assumptions and limitations related to this investigation:

1. Although the low and high groups differed in their perception of the amount of time spent on various activities, they also differed in two important ways, that is, the number of handicapped children served and total number of LEAs within the IEUs. The reader should note the limitations inherent in the possibility that larger IEUs in major metropolitan areas may indeed have unique factors, such as size, that impede the ability of the CPMDCs to reduce the number of SESA citations regardless of the perceived importance of, or time spent engaging in, the seven SESA determined activities.

2. Another limitation is that, although interviewees were generally quite candid during the structured interviews, for various
reasons some interviewees may not have reported all additional activities they were engaging in during a school year. An area where interviewee bias may have occurred, if indeed it did, would be the supervision of special education personnel. CPMDGs generally stated for the record that if they engaged in the extra activities related to the performance of other professional staff they would prefer that this be considered coordination of services rather than supervision of personnel.

3. The intent of this study was to establish a predictive rather than causal relationship among variables. This has impact on the generalizations that can be made concerning the study. It has not been suggested that the perceived importance of and the time spent engaging in these activities by the CPMDGs results in an increase or decrease in negative SESA citations during IEU monitoring visits; however, by examining these relationships, the investigator attempted to develop the data base for further investigations of causal relationships.

4. Any generalization of the findings of this investigation to other state's IEU monitoring personnel would not be appropriate in most situations because the activities differ from state to state. However, the generalization that these findings may be appropriate for decision makers in other states where the IEU monitoring position and activities are similar can be defended.

5. The investigator agreed with Howe (1981) that the likelihood of appropriate special education services increase as legal compliance has been achieved by an IEU. This is an important
assumption to note because SESA monitoring visits were quantitative in nature rather than qualitative, for example, a strong CPMDC who enhances compliance through an individual effort in spite of poor teaching or lack of an appropriate curriculum. A quantitative evaluation, such as a SESA monitoring visit, may yield different results than would be found from a qualitative evaluation by a special education content expert.

Conclusions

The low negative SESA citation group is homogeneous in that participants' views concerning the importance of and the time spent engaging in seven required activities were found to be related. The low group generally believed they spent more time and ranked the importance of collecting, editing, and verifying the accuracy of P.L. 94-142 related forms to a greater degree than the high group.

The low group engaged in fewer additional non-CPMDC oriented activities than the high group.

In contrast, the high negative SESA citation group is not homogeneous, in that participants' views concerning the importance of and the time spent engaging in seven required activities were found to be unrelated. The high group generally reported they spent more time and ranked the importance of seven activities in a much broader manner covering all activities.

The high group engaged in more additional non-CPMDC oriented activities than the low group.
Implications and Recommendations

The data obtained in this investigation suggest that there are differences in carrying out the role of CPMDC within those IEUs which are most and least successful in the implementation of free appropriate public education for handicapped students in the state of Michigan. These differences have predictive implications about the number of negative SESA citations an IEU may receive during a monitoring visit.

Those predictive implications are:

1. The perceived importance and the amount of time engaged in P.L. 94-142 paperwork and the size of the IEU are related to the IEU's ability to meet SESA standards as shown by the attention given to Activities 2 (Reporting), 3 (Title VI), and 6 (Compliance) by the low group and the spread of attention given to activities by the high group. It would appear appropriate for IEU Directors of Special Education and CPMDCs to reconsider the importance of (a) the collection and editing of various MDE forms, (b) issues of non-compliance, (c) the monitoring of compliance, and (d) assisting in the implementation of corrective action.

2. IEU Directors of Special Education may have to be more discriminating in the additional tasks they assign CPMDCs. This implication is supported by the data showing that the high group engaged in 38 additional activities as compared to 22 additional activities by the low group. It would appear that CPMDCs should not let their interests, such as microcomputer programming or 4-H Club, dominate
their time to the extent that CPMDC related responsibilities are not fulfilled.

Based on this information the following recommendations are appropriate:

1. There is a need for the role and responsibilities of the CPMDC position to be more clearly defined and monitored by SESA and IEUs based on the size of the IEU rather than the present all encompassing approach which treats all IEUs the same. Explicit standards would encourage uniformity of function and effectiveness. At the present time, the position has a unique autonomy of function and there are external standards for accountability. As a result of the implementation of this recommendation by SESA, accountability would be enhanced. There is now a documented need for assuring that individuals holding the position of CPMDC do not engage in non-CPMDC oriented activities.

2. There is a need to determine if the present educational standard, that is, a bachelor's degree in any area of special education, is appropriate for assigning a person to a CPMDC position and if pretraining competencies are needed for individuals who wish to be CPMDCs. Examining job descriptions and periodic upgrading of job descriptions may assist SESA and IEUs in determining the current and future qualifications needed for the position of CPMDC.

3. Future research studies in this area may well include an investigation related to the psychological impact on CPMDCs who, if they take their mandate seriously, may be required to provide
evidence of noncompliance to persons or agencies outside of their employing IEUs.
REFERENCES


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Petry, G. H. Questionnaires: Burden or benefit to universities? *College and University*, 1976, 52, 71-78.


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Appendix A

Jury Instructions and Response Form
November 5, 1982

Dear __________:

Thank you for agreeing to participate as a jury member to determine the appropriateness of seven activities which individuals holding Coordinator of Planning, Monitoring, and Data Collection positions are responsible for coordinating. Enclosed is a jury member checklist that contains the seven activities that are believed to be representative of the tasks related to the CPMDC position. Based on your experience and knowledge concerning the CPMDC position please review each activity and indicate if it is appropriate.

The following procedural steps are recommended for the completion of your task:

1. Judge each activity to determine its appropriateness to the CPMDC position.
2. Document your decision concerning the appropriateness of each activity by writing the word "yes" or "no" or "omit."
   2.1. If "yes" is your decision continue to the next activity.
   2.2. If "no" is your decision make the revision necessary to make the activity appropriate and then continue to the next activity.
   2.3. If "omit" is your decision suggest an alternative activity, if necessary, in the section following all activities entitled Recommendations (include activity number) and then continue to the next activity.
3. Please detail additional activity recommendations, if you judge that this to be necessary, in the section entitled Additional Recommendations.
4. Answer the questions entitled The Ability of Individuals Holding the CPMDC Position to Respond.

A self-addressed, stamped envelope has been provided in order to return the completed checklist. Your cooperation is deeply appreciated. Thank you.

Sincerely,

William Howard
Doctoral Student

WH/te
Enclosure
JURY RESPONSE FORM

Activities

The seven activities which individuals holding CPMDC positions are responsible for coordinating are the following: (The activities which follow are quoted directly from the Amended Annual Program Plan for Fiscal Years 1981-83, p. 18-19.)

(1) MAINTENANCE OF THE STUDENT REGISTRY AND CONDUCT PERIODIC AUDITS REGARDING ITS VALIDITY.

Is Activity 1 appropriate? __________

(2) COLLECTION AND EDITING OF THE FOLLOWING MDE FORMS, VERIFICATION OF THEIR ACCURACY, AND TIMELY SUBMISSION TO APPROPRIATE SERVICE AREAS:

(A) DS-4061 MEMBERSHIP REPORTS AND DS-4096 FINAL COST REPORTS
(SUBMITTED TO DEPARTMENT OF SERVICES)

(B) SE-4625, DECEMBER 1 SPECIAL EDUCATION STUDENT COUNT
(SUBMITTED TO THE SPECIAL EDUCATION SERVICE AREA)

(C) SE-4625 TITLE VI-B, P.L. 94-142 APPLICATION
(SUBMITTED TO THE SPECIAL EDUCATION SERVICE AREA)

Is Activity 2 appropriate? __________

(3) PREPARATION OF ALL INTERMEDIATE EDUCATION UNIT TITLE VI APPLICATIONS, MONITORING OF PROJECT PROGRESS AND TIMELY SUBMISSION OF YEAR-END REPORTS.

Is Activity 3 appropriate? __________

(4) MEETINGS WITH THE PARENT ADVISORY COMMITTEE ON AT LEAST A QUARTERLY BASIS TO PROVIDE FOR COMMUNICATION AND DISSEMINATION
OF CURRENT AND PRESSING ISSUES REGARDING THE SPECIAL EDUCATION DELIVERY SYSTEM.

Is Activity 4 appropriate? __________

(5) MEETING WITH LEA AND IEU PERSONNEL REGARDING MICHIGAN DEPARTMENT OF EDUCATION INTERMEDIATE DISTRICT PLAN CRITERIA AND MODIFICATIONS THAT ARE REQUIRED UNDER P.A. 198 (451) and P.L. 94-142.

Is Activity 5 appropriate? __________

(6) REPORTING OF ALL CASES OF NONCOMPLIANCE REGARDING THE INTERMEDIATE PLAN AND ASSISTING IN THE FINAL RESOLUTION OF THOSE PROBLEMS. DEVELOPMENT OF PROCEDURES TO MONITOR COMPLIANCE TO THE INTERMEDIATE PLAN ASSISTING IN IMPLEMENTATION OF CORRECTIVE ACTION.

Is Activity 6 appropriate? __________

(7) REVIEW OF APPLICATIONS AND PROVISION OF TECHNICAL ASSISTANCE TO SCHOOL DISTRICTS ON PROJECTS SUBMITTED REGARDING PROFESSIONAL DEVELOPMENT, DEMONSTRATION, AND RESEARCH ACTIVITIES.

Is Activity 7 appropriate? __________

The ability of individuals holding the CPMDC position to respond

Please answer the questions by responding "yes" or "no."

Question 1: Could an individual holding a CPMDC position prioritize these seven activities in rank order as to the importance of each activity accurately? ________

Comments:
Question 2: Could an individual holding a CPMDC position rank these seven activities in order as to the time spent concerning each activity accurately? ________

Comments:

Recommendations

Additional Recommendations
Appendix B

Results of Jury Member Questionnaire
JURY RESPONSE FORM

Activities

The seven activities which individuals holding CPMDC positions are responsible for coordinating are the following: (The activities which follow are quoted directly from the Amended Annual Program Plan for Fiscal Years 1981-83, p. 18-19.)

(1) MAINTENANCE OF THE STUDENT REGISTRY AND CONDUCT PERIODIC AUDITS REGARDING ITS VALIDITY.

Is Activity 1 appropriate? 5 yes

(2) COLLECTION AND EDITING OF THE FOLLOWING MDE FORMS, VERIFICATION OF THEIR ACCURACY, AND TIMELY SUBMISSION TO APPROPRIATE SERVICE AREAS:

(A) DS-4061 MEMBERSHIP REPORTS AND DS-4096 FINAL COST REPORTS (SUBMITTED TO DEPARTMENT OF SERVICES)

(B) SE-4625, DECEMBER 1 SPECIAL EDUCATION STUDENT COUNT (SUBMITTED TO THE SPECIAL EDUCATION SERVICE AREA)

(C) SE-4625 TITLE VI-B, P.L. 94-142 APPLICATION (SUBMITTED TO THE SPECIAL EDUCATION SERVICE AREA)

Is Activity 2 appropriate? 4 yes; 1 yes for B & C, but no for A

(3) PREPARATION OF ALL INTERMEDIATE EDUCATION UNIT TITLE VI APPLICATIONS, MONITORING OF PROJECT PROGRESS AND TIMELY SUBMISSION OF YEAR-END REPORTS.

Is Activity 3 appropriate? 5 yes

(4) MEETINGS WITH THE PARENT ADVISORY COMMITTEE ON AT LEAST A QUARTERLY BASIS TO PROVIDE FOR COMMUNICATION AND DISSEMINATION
OF CURRENT AND PRESSING ISSUES REGARDING THE SPECIAL EDUCATION DELIVERY SYSTEM.

Is Activity 4 appropriate? _4 yes_ 1 no

(5) MEETING WITH LEA AND IEU PERSONNEL REGARDING MICHIGAN DEPARTMENT OF EDUCATION INTERMEDIATE DISTRICT PLAN CRITERIA AND MODIFICATIONS THAT ARE REQUIRED UNDER P.A. 198 (451) and P.L. 94-142.

Is Activity 5 appropriate? _4 yes_ 1 maybe

(6) REPORTING OF ALL CASES OF NONCOMPLIANCE REGARDING THE INTERMEDIATE PLAN AND ASSISTING IN THE FINAL RESOLUTION OF THOSE PROBLEMS. DEVELOPMENT OF PROCEDURES TO MONITOR COMPLIANCE TO THE INTERMEDIATE PLAN ASSISTING IN IMPLEMENTATION OF CORRECTIVE ACTION.

Is Activity 6 appropriate? _5 yes_ 

(7) REVIEW OF APPLICATIONS AND PROVISION OF TECHNICAL ASSISTANCE TO SCHOOL DISTRICTS ON PROJECTS SUBMITTED REGARDING PROFESSIONAL DEVELOPMENT, DEMONSTRATION, AND RESEARCH ACTIVITIES.

Is Activity 7 appropriate? _4 yes_ 1 no

******************************************************************************

The ability of individuals holding the CPMDC position to respond

Please answer the questions by responding "yes" or "no."

Question 1: Could an individual holding a CPMDC position prioritize these seven activities in rank order as to the importance of each activity accurately? _4 yes_ 1 maybe

Comments: From the jury member who responded "maybe" the following comment was written:
This would vary greatly from district to district. No two positions would be the same. I don't believe one activity is necessarily more important than another. They all would need to be accomplished at some time. If it was the time of year when a particular activity was due, it would become high priority [sic]. (Dec. 1 count is of low priority in June.)

From a jury member who responded "yes" the following comment was written: "The prioritization should be done with immediate supervisor [sic]."

Question 2: Could an individual holding a CPMDC position rank these seven activities in order as to the time spent concerning each activity accurately? 4 yes 1 no

Comments: From the jury member who responded "no" the following comment was written:

This determination would have to be estimated at best. The time spent on these activities varies tremendously over any period of time throughout the school and fiscal year. Activities 1, 2, and 3 could be estimated most accurately of all the seven activities in terms of time requirements (time needed). However, too many variables enter in on carrying out these activities with an accurate time frame from year to year.

From a jury member who responded "yes" the following comment was written: "This would not be consistent from one district to another. The CPMDC would rank them as they apply to his district."

Recommendations

Alternate activities were not recommended.
Additional Recommendations

Jury Member Number One:
Overall reaction: I believe these activities could all be included in the job. I also feel the emphasis on various parts could vary from district to district. Some of these activities may be assigned to other than the CPMDC person.

Jury Member Number Two:
Some I.S.D.'s [IEUs] require the CPMDC person to coordinate all L.E.A. and I.S.D. [IEU] professional personnel records (e.g., teacher certification and special education approvals).

Jury Member Number Three:
I have always questioned how these activities were decided originally. I believe that some of the activities are more appropriately accomplished by others, for example [the] business office or director of special education.

Jury Member Number Four:
Concerning Activity (2), add (D) Personnel Inventory.

Jury Member Number Five:
No response.
Appendix C

CPMDC Interview Format
Question One:

Will you please rank these seven activities in order based on the time spent concerning each activity during a school year.
(Forced choice, 1 through 7, with 1 being the highest and 7 lowest)

_____ Student registry activities.

_____ Collection, editing, and verification of Membership, Final Cost, Student Count, and Title VI-B (P.L. 94-142 funds).

_____ Preparation of Title VI Applications (P.L. 94-142 funds), Monitoring of Project Progress and Submission of Year-End Reports.

_____ Preparation for and meetings with the Parent Advisory Committee (PAC) and dissemination of information regarding the Special Education Delivery System.

_____ Meetings with LEA/ISD (IEU) Personnel concerning the MDE State Plan.

_____ Reporting noncompliance, assisting noncompliance resolution, developing monitoring procedures, and assisting in the implementation of corrective action.

_____ Preparing and submitting application for and providing for the process of professional development, demonstration, and research.
Equal Activity Rank Procedure for Question One:

Will you please rank the subactivities in each activity area based on the time spent concerning each subactivity during a school year.

Area 1

______ Maintenance of student registry
______ Student registry audits

Area 2

______ Collection, editing, and verification of DS-4061 Membership reports
______ Collection, editing, and verification of DS-4096 Final Cost reports
______ Collection, editing, and verification of Dec. 1 Student Count reports
______ Collection, editing, and verification of Title VI-B reports

Area 3

______ Preparation of Title VI applications
______ Monitoring of Project Progress
______ Submission of Year-End Reports

Area 4

______ Meet with PAC
______ Dissemination of information regarding the Special Education Delivery System
Area 5
(only one activity)

Area 6

_____ Report noncompliance
_____ Assist noncompliance resolution
_____ Develop monitoring procedures
_____ Assist implementation of corrective action

Area 7

_____ Preparing and submitting application for and providing for the process of professional development
_____ Preparing and submitting application for and providing for the process of demonstration
_____ Preparing and submitting application for and providing for the process of research
Question Two:

Please rank these same activities in order of importance concerning your ability to fulfill the mission of your position during a school year. (Forced choice, 1 through 7, with 1 being the highest and 7 lowest)

______ Student registry activities.

______ Collection, editing, and verification of Membership, Final Cost, Student Count, and Title VI-B (P.L. 94-142 funds).

______ Preparation of Title VI Applications (P.L. 94-142 funds), Monitoring of Project Progress and Submission of Year-End Reports.

______ Preparation for and meetings with the Parent Advisory Committee (PAC) and dissemination of information regarding the Special Education Delivery System.

______ Meetings with LEA/ISD (IEU) Personnel concerning the MDE State Plan.

______ Reporting noncompliance, assisting noncompliance resolution, developing monitoring procedures, and assisting in the implementation of corrective action.

______ Preparing and submitting application for and providing for the process of professional development, demonstration, and research.
Equal Activity Rank Procedure for Question Two:

Will you please rank the subactivities in each area based in order of importance concerning your ability to fulfill the mission of your position during a school year.

Area 1

______ Maintenance of student registry
______ Student registry audits

Area 2

______ Collection, editing, and verification of DS-4061 Membership reports
______ Collection, editing, and verification of DS-4096 Final Cost reports
______ Collection, editing, and verification of Dec. 1 Student Count reports
______ Collection, editing, and verification of Title VI-B reports

Area 3

______ Preparation of Title VI applications
______ Monitoring of Project Progress
______ Submission of Year-End Reports

Area 4

______ Meet with PAC
______ Dissemination of information regarding the Special Education Delivery System

********************************************************************
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Area 5
(only one activity)

Area 6

- Report noncompliance
- Assist noncompliance resolution
- Develop monitoring procedures
- Assist implementation of corrective action

Area 7

- Preparing and submitting application for and providing for the process of professional development
- Preparing and submitting application for and providing for the process of demonstration
- Preparing and submitting application for and providing for the process of research
Question Three:

What additional activities are you engaged in as a Coordinator of Planning, Monitoring, and Data Collection during a school year? (Open ended)

Question Four:

What additional activities do you believe you should be engaging in that would be helpful to fulfill the mission of your position?

Question Five:

You have recently been hired as a director of special education in an intermediate school district that has had an unusually high number of SESA negative citations. What single activity would you request your CPMDC engage in to reduce the number of negative citations during the next SESA monitoring visit?
Appendix D

Letter Requesting Participation and Response Form
Director of Special Education
(Heading)

Dear ____________________:

Recently, a great deal of discussion has been generated about monitoring special education at the Intermediate School District level. In most ISDs, the Coordinator of Planning, Monitoring, and Data Collection (CPMDC) is the key individual involved with the ISD's monitoring efforts. This relatively new position has not been researched regarding how the CPMDC spends his or her time, what the CPMDC believes to be the important aspects of the position, and what additional activities and ideas may enhance the CPMDC's ability to perform.

In order to attempt to understand the dynamics of the CPMDC position and provide ISD Directors of Special Education information about monitoring, a research study has been initiated. The participants of this study, Coordinators of Planning, Monitoring, and Data Collection, will be interviewed at their ISD office. This interview will be approximately 20 minutes in length. All results, names of participants, and ISDs will be kept confidential. Furthermore, results of the study will be provided upon request.

________________________ has been selected to be a participant of this CPMDC research study. Please discuss with __________________ the possibility of (his or her) participation in this study.

Enclosed is a short response form and a self-addressed stamped envelope. Your prompt attention concerning this study is deeply appreciated. Thank you.

Sincerely,

William Howard, Doctoral Candidate
Department of Special Education
College of Education
Western Michigan University
Kalamazoo, MI 49008

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Response Form

Please check the appropriate box and return this form to the researcher in the self-addressed stamped envelope.

☐ Yes, our CPMDC has agreed to be interviewed at our I.S.D. Please call our CPMDC and make arrangements for this interview at a mutually convenient time.

☐ We would like to cooperate but feel that further information would assist our decision. Please contact ______________________ (name) at our office ______________________ (phone).

☐ No, we do not wish to participate in the CPMDC research study.

Name: ________________________________
Title: ________________________________
I.S.D. ________________________________
Appendix E

Analysis of Perceived Most Important Subactivities Within the Low Group
Low Group
Importance
Activity 2

Frequency

DS-4061 Membership reports
DS-4096 Final cost reports
Dec. 1 student count reports
Title VI-B reports
Low Group
Importance
Activity 3

Frequency

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Activity: 6
Importance: Low Group
Appendix F

Analysis of Perceived Least Important Subactivities Within the Low Group
Low Group
Importance
Activity 1

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Low Group Importance

Activity 7

Frequency

Professional development

Demonstration

Research
Appendix G

Analysis of Perceived Most Important Subactivities Within the High Group
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<th>Frequency</th>
<th>DS-4061 Membership reports</th>
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High Group
Importance
Activity 3

Frequency

10
9
8
7
6
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4
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2
1

Applications
Progress
Reports
- Report noncompliance
- Assist noncompliance resolution
- Developing monitoring procedures
- Assist implementation of corrective action

Frequency

- High Group
- Importance
- Activity 6
Appendix H

Analysis of Perceived Least Important Subactivities Within the High Group
High Group Importance

Activity 1

Frequency

1 2 3 4 5 6 7 8 9 10

Maintenance of student registry

Student registry audits
High Group
Time Spent
Activity 7

Frequency

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Professional development
Demonstration
Research
Appendix I

Analysis of Subactivities Within the Low Group Relating to Most Time Spent
Low Group
Time Spent
Activity 3

Frequency

10
9
8
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6
5
4
3
2
1

Applications

Progress

Reports
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Appendix J

Analysis of Subactivities Within the Low Group Relating to Least Time Spent
Low Group

Time Spent

Activity 1

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Low Group
Time Spent
Activity 7

Frequency

Professional development

Demonstration

Research
Appendix K

Analysis of Subactivities Within the High Group Relating to Most Time Spent
High Group

Time Spent

Activity 3

Frequency

10
9
8
7
6
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4
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2
1

Applications  Progress  Reports
Appendix L

Analysis of Subactivities Within the High Group Relating to Least Time Spent
High Group
Importance
Activity 7

Frequency

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<th>Research</th>
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Appendix M

Additional Activities Engaged In by Coordinators of Planning, Monitoring, and Data Collection
### Additional Activities

**Low CPMDC Group**

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<th>Activity</th>
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<tr>
<td>1. Collection of information for, writing, and editing IEU plan</td>
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<tr>
<td>2. Arts for Handicapped programming</td>
<td>2</td>
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<tr>
<td>3. Project special education budgets for LEAs</td>
<td>1</td>
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<tr>
<td>4. Coordinating special education activities</td>
<td>1</td>
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<tr>
<td>5. Develop special education graduation curriculum standards</td>
<td>1</td>
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<tr>
<td>6. Covering additional programs within the Department of Special Education</td>
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<tr>
<td>7. General education professional development coordinator</td>
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<tr>
<td>8. Planning camping activities for the handicapped</td>
<td>1</td>
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<tr>
<td>9. 4-H mainstreaming grant</td>
<td>1</td>
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<tr>
<td>10. Responsible for special education equipment inventory</td>
<td>1</td>
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<tr>
<td>11. Chairperson for IEPC meetings</td>
<td>1</td>
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<tr>
<td>12. Business office payroll activities</td>
<td>1</td>
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<tr>
<td>13. Cost comparison study for IEU concerning center programs</td>
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<tr>
<td>14. Initial preparation of special education budget</td>
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<td>15. Responsible for special education equipment inventory purchases</td>
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<tr>
<td>16. Coordination of special education staff</td>
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**Total** 22


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<th>Activity</th>
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<tr>
<td>1. Collection of information for, writing, and editing IEU Program Plan</td>
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<tr>
<td>2. Draft complete special education budget</td>
<td>3</td>
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<td>3. Additional non-CPMDC related committee work</td>
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<td>4. Bidding of non-special education equipment</td>
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<td>5. Contract negotiations</td>
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<td>6. Represent IEUs at hearings</td>
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<td>7. Special education curriculum development</td>
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<td>8. Coordinate preschool diagnostic team</td>
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<td>9. Transportation related activities</td>
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<td>10. Coordinate special education staff</td>
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<td>11. Supervise preschool program</td>
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<td>12. Special education curriculum development</td>
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<td>13. Special Olympics</td>
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<td>14. Involvement in community organizations' special education efforts</td>
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<td>15. Writing computer programs</td>
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<td>16. Member of Regional Educational Media Center Advisory Board</td>
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<td>17. Regional Educational Media Center equipment check-out, inventory, and activities</td>
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<tr>
<td>18. Computer consultant</td>
<td>1</td>
</tr>
<tr>
<td>19. Non-CPMDC oriented in-service education presentations</td>
<td>1</td>
</tr>
<tr>
<td>20. Conducted Hay's study interviews</td>
<td>1</td>
</tr>
</tbody>
</table>
High CPMDC Group (continued)

<table>
<thead>
<tr>
<th>Activity</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consultation in the area of program development</td>
<td>1</td>
</tr>
<tr>
<td>Arrange all hearings</td>
<td>1</td>
</tr>
<tr>
<td>Superintendent's Advisory Committee member</td>
<td>1</td>
</tr>
<tr>
<td>Chairperson for special education study committee</td>
<td>1</td>
</tr>
<tr>
<td>Drafted special education administrative manual</td>
<td>1</td>
</tr>
<tr>
<td>Reviewing computer related purchases</td>
<td>1</td>
</tr>
<tr>
<td>Substitute school bus driver</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>38</strong></td>
</tr>
</tbody>
</table>
Appendix N

Results of Additional Activities Which Should Be Engaged In But Are Not
### Additional Activities Which Should be Engaged In

#### Low CPMDC Group

<table>
<thead>
<tr>
<th>Activity</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Interaction with political forces (e.g., LEA superintendents)</td>
<td>1</td>
</tr>
<tr>
<td>2. Coordinate special education planning for programs and services</td>
<td>1</td>
</tr>
<tr>
<td>3. Communication with other Coordinators of Planning, Monitoring, and Data Collection and special education administrators</td>
<td>1</td>
</tr>
</tbody>
</table>

#### High CPMDC Group

<table>
<thead>
<tr>
<th>Activity</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Interaction with political forces (e.g., LEA superintendents)</td>
<td>1</td>
</tr>
<tr>
<td>2. All the same administrative activities as the director</td>
<td>1</td>
</tr>
</tbody>
</table>
Appendix 0

Results of the Most Important Activity to Engage In to Reduce the Number of Negative Citations
Results of the Most Important Activity to Engage in to Reduce the Number of Negative Citations

**Low CPMDC Group**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Direct the CPMDC to communicate more with LEAs in order to form positive relations with superintendents, local special education coordinators, and teachers</td>
<td>5</td>
</tr>
<tr>
<td>2. Direct the CPMDC to conduct teacher/administrator in-service education sessions regarding rules, regulations, and forms</td>
<td>2</td>
</tr>
<tr>
<td>3. Direct the CPMDC to categorize citations and investigate what is happening</td>
<td>1</td>
</tr>
<tr>
<td>4. Direct the CPMDC to emphasize yearly IEU monitoring</td>
<td>1</td>
</tr>
<tr>
<td>5. Direct the CPMDC to review all IEPC and Multi-disciplinary Evaluation Team forms</td>
<td>1</td>
</tr>
</tbody>
</table>

Total 10

**High CPMDC Group**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Direct the CPMDC to communicate more with LEAs in order to form positive relations with superintendents, local special education coordinators, and teachers</td>
<td>3</td>
</tr>
<tr>
<td>2. Direct the CPMDC to conduct teacher/administrator in-service education sessions regarding rules, regulations, and forms</td>
<td>3</td>
</tr>
<tr>
<td>3. Direct the CPMDC to categorize citations and investigate what is happening</td>
<td>1</td>
</tr>
<tr>
<td>4. Direct the CPMDC to review all IEPC and Multi-disciplinary Evaluation Team forms</td>
<td>1</td>
</tr>
<tr>
<td>5. Direct the CPMDC to review all case loads and teacher certifications</td>
<td>1</td>
</tr>
</tbody>
</table>

Total 9
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