AN INVESTIGATION OF THE FACTORS INFLUENCING SPECIAL EDUCATION DIRECTORS IN SOUTH CAROLINA IN THE IMPLEMENTATION OF POLICY

Julie Fowler
Clemson University, jfowler67@embarqmail.com

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AN INVESTIGATION OF THE FACTORS INFLUENCING SPECIAL EDUCATION DIRECTORS IN SOUTH CAROLINA IN THE IMPLEMENTATION OF POLICY

A Dissertation
Presented to
the Graduate School of
Clemson University

In Partial Fulfillment
of the Requirements for the Degree
Doctor of Philosophy

by
Julie Gore Fowler
May 2009

Accepted by:
Dr. Jack Flanigan, Committee Chair
Dr. Mike Campbell
Dr. Russ Marion
Dr. Laura Olson
ABSTRACT

Educational administrators assume that government-imposed policies are foundational to everyday decision-making in their respective districts; however, inherent to policies are the interpreters and the ramifications of their interpretations. Personnel responsible for interpreting and implementing new special education policy, in Local Education Agencies (LEAs), are the local directors of special education. This study examined the role of networking and the spread of isomorphic pressures by isolating the factors influencing special education directors in the implementation of federal, state, and local policy at the local level.

Faced with the challenge of implementing IDEIA 2004, South Carolina directors of special education confronted tough implementation decisions, which increased networking and pressured directors of special education to succumb to isomorphic pressures.

This qualitative, grounded theory study isolated the factors that influence the decision-making of directors of special education when faced with the implementation of new policy. The findings support the propositions, which were built on explanatory relationships and give meaning to the emergent theory grounded in the data of this study and practical to everyday decision-making among directors of special education.
DEDICATION

To God be the glory! May I forever use my gifts and talents in ways that are pleasing to Him.

This work is dedicated to my husband Jimmy, better known as “Honey Fowler”, who is my soul mate and my best friend. His many prayers and consistent words of encouragement and praise gave me the strength to persevere. The commitment and passion he models has taught me to put first things, first. Honey Fowler, your unconditional love and support are unsurpassed. I love you!

To my children, Trey and Sidney Ann, words cannot express my gratitude for the sacrifices you made for this endeavor to be possible. With smiles on your faces, you supported me day after day. I am a living example that all things are possible. Never give up your dreams…commitment and determination make dreams become realities. You are my heart and my soul and I love you.

To my parents Dr. and Mrs. James R. Gore, Mother and Diddy, who have told me all of my life that there was no limit to what I could accomplish. Thank you. Godly Mothers intuitively nurture and foster the strengths of their children. Mother, thank you for investing time in me, reading to me, and singing with me at an early age. I will carry a song in my heart forever. Diddy, thank you for modeling principle, a strong work ethic and a sense of pride in all you do. It lifts me higher with each passing day. In addition to your love, being raised in a loving Christian home, and witnessing the honor, respect, and admiration synonymous with our family name, you gave me the greatest gift; you instilled the love of learning and the importance of education in my heart. I love you both.
and I attribute much of my successes to a great foundation. God melded a perfect team
and I am so fortunate to have you as my parents.

To my sisters and greatest cheerleaders, Doty and Missy, I thank you for the
phone calls late at night when you knew that I’d be researching and writing and you
wanted to lend support. What a comfort it was to have my personal dictionary.com, my
personal thesaurus, and my personal grammar and spelling authorities on speed dial.
Most of all, thanks for being the best proof readers in Ya-Ya Land! Our strengths all
complement one another and we are blessed in so many ways. You are precious in my
sight, too! I love you bunches!
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To my committee members at Clemson University, words are not sufficient to express my deep gratitude for sharing your expertise, time, and friendship. Dr. Flanigan, the depth of your knowledge, the wisdom of your years, and the kindness in your voice are magic. Thank you for believing in me, stretching me, mentoring me, and expecting nothing but perfection. Most of all, thank you for chairing my committee. Dr. Marion, your statistical mind will forever challenge me. Thank you for your patience while I learned to think in numbers. You will forever remain the WPEC celebrity! Dr. Olson, you exposed me to a new world view of “politics and players.” Your enthusiasm, confidence, and delivery of instruction is worthy of emulating. I was learning from you when you were not even aware. Thank you for helping me see the trees and for sharing your effervescent spirit. Dr. Campbell, “ole country boy”, thank you for fertilizing my mind with the essential elements required for daily execution of K-12 education and the dynamics of the superintendency. I am forever indebted to you for sharing a practical and sensible approach to school leadership.

Throughout this journey, I am fortunate to have been a member of a cohort. The members of this cohort are all administrators in local school districts or with the State Department of Education, and most of us are parents and spouses which means we work at school and then work our other job or two at home. Although our friends and families love and support us, it is our “cohort family” who truly understands the trials and tribulations of pursuing this dream. Thanks to everyone in my cohort for being a rock for me and for each other.
I have received well wishes and words of encouragement from extended family and friends since embarking on this journey. On days when I was too tired to work, you lifted me up and I sincerely thank you. Your thoughtfulness and periodic checks kept me inspired.

I am honored to have the opportunity to impact the lives of students every day. Thank you to the school districts who allowed me to balance this journey while furthering my knowledge and understanding of educational leadership. Thank you to my many colleagues, my friends, for your team spirit and unwavering support. To my colleagues who so graciously assisted me, consented to interviews, and returned my surveys, you made this study possible.
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CHAPTER ONE

INTRODUCTION

Educational administrators assume that government-imposed policies are foundational to everyday decision-making in their respective districts; however, inherent to policies are the interpreters and the ramifications of their interpretations. Educational outcomes at the local level are not always a direct result of rational decision-making; rather, policy decisions are often heavily influenced by institutional pressures (McLaughlin, 1987).

One example of the influence of institutional pressures on education policy decisions is the policy requirements accompanying the passage of Public Law 94-142 (The Education of All Handicapped Children Act) in 1975. This was the single piece of legislation that first impacted the education of handicapped children in our public school system (Alexander & Alexander, 2005). Shortly thereafter, Public Law 94-142 was amended and renamed Public Law 105-117, the Individuals with Disabilities Education Act (IDEA) in 1997 (Norlin & Gorn, 2005). The reauthorization of IDEA resulted in the alteration of the 1997 mandate.

The Individuals with Disabilities Education Improvement Act (IDEIA) of 2004 is the reauthorization of the Individuals with Disabilities Education Improvement Act (IDEA) of 1997 and currently governs special education programs in American public schools. Historically, special education programs have been governed by federal and state mandates, which create a need for additional state, local, and district policy. The effectiveness of these policies rests with individuals within the American public
education policy system who interpret and respond to them (McLaughlin, 1987). These individuals work within the State Departments of Education and more specifically, the Office of Exceptional Children (SCDE-OEC) and the directors of special education in the Local Education Agency (LEA). Local school district directors of special education are the persons who are responsible for the implementation of IDEIA. What factors influence special education directors in the implementation of federal, state, and local policy at the district level?

Statement of Problem

LEA directors of special education rely on guidance from the state when implementing new policy. Local directors receive state policy and procedures that are developed based on the federal regulations. Once these are received, directors depend on further guidance from the state on which they base their implementation strategies.

Directors of special education are charged with ensuring that policy is transformed from paper to practice. It is every director of special education’s responsibility to assess the degree of fidelity with which their district administrators and teachers implement policy. Directors also monitor the rate of implementation and the effectiveness of implementation, while providing the resources, forms, curriculum, programming, and training necessary to do so. Hence, there is a need to investigate the factors that influence directors making decisions, as they are accountable for practices occurring within their districts.

This study seeks to examine the role of networking and isomorphic pressures by isolating the factors influencing special education directors in the implementation of
federal, state, and local policy at the local level. While the qualifications to hold the position of a local director and duties of this position vary across the state, all directors are responsible for implementing policy. Isolating the factors influencing their decision-making will assist directors in self assessing the effectiveness and impact of their decisions.

**Purpose of Study**

This study seeks to examine the role of networking and the spread of isomorphic pressures by isolating the factors influencing special education directors in the implementation of federal, state, and local policy at the local level. Grounded theory is used to document existing frameworks, illustrate and explain how procedures are used in the field, and offer solutions derived from gathered data (Selden, 2005).

The purpose of this study is to isolate the factors that influence special education directors in the implementation of policy. When a policy is developed or reauthorized, directors of special education have the arduous task of obtaining a large volume of information and acting upon it. DiMaggio and Powell (1991) suggest that personnel responsible for interpreting and implementing new policy strive to gain legitimacy, and mechanisms of influence characterized as coercive, mimetic, and normative pressures are the conduits by which legitimacy is achieved. In the LEA, directors of special education are responsible for implementing federal and state policy and procedures governing special education. Which of these three factors have the most influence on special education directors in their implementation of federal, state, and local policy in schools?
Directors of special education assume the task of implementation when policies are pertinent to special education programs. As a result, directors of special education would benefit from understanding what role isomorphic pressures play in shaping administrators’ knowledge of IDEIA and which of DiMaggio and Powell’s (1983) three isomorphic pressures has the greatest influence on administrators during implementation. Information gleaned from this awareness may affect directors’ actions in the pursuit of legitimacy and ultimately affect outcomes for LEAs. Furthermore, Westphal, et al. (1997) propose that networking increases the spread of isomorphic pressures, and directors’ exposure to isomorphic pressures may increase what March (1994) refers to as logic of appropriateness in lieu of logic of consequence.

**Significance of Study**

The reauthorization of IDEIA (2004) requires changes to state and local policies. For LEAs, this burden rests on the shoulders of each school district’s director of special education, although the superintendent is ultimately responsible for overseeing district policy implementation. Educational systems appear to be isomorphic and as a result, give the appearance of change without the reality of change. Cutting-edge educational policies do not ensure that children learn; instead, policy implementation determines this outcome (Kovel-Jarboe, 1996).

This study isolates the factors influencing LEA directors of special education, and presents answers to the guiding questions through emergent theory grounded in the data.
Theoretical Framework and Perspectives

The educational processes and administrative decision-making that are spawned from new mandates are more effectively understood when viewed through the lens of institutional theory. “Institutional theory is driven by the problematic of why different organizations operating in very different environments, are often so similar in structure” (Zucker & Tolbert, 1994, p. 1). Given Zucker and Tolbert’s archetypical statement about institutional theory, it is not presumptuous to conclude that the influence of the broad environment determines the parameters of legitimate policy in specific schools.

Institutional theory is grounded in human need for legitimacy or the quest to be perceived as effective. Notions of legitimacy often are based on informal perceptions that diffuse through a system by means of various network structures.

Institutional isomorphism illustrates how behavior is diffused by means of coercive, mimetic, or normative pressures, thus causing organizations to look alike (DiMaggio & Powell, 1983, 1991). “Organizations tend to model themselves after similar organizations in their field that they perceive to be more legitimate or successful” (DiMaggio & Powell, 1983). As LEAs comply with new regulations and policies, autonomous levels of discretion will be bestowed upon directors of special education, resulting in the authority to adopt models associated with success regardless of the outcome, while striving to attain legitimacy (DiMaggio & Powell, 1983; Meyer & Rowan, 1977). For the purposes of this study, LEA directors of special education who are either members of formal consortiums or non-consortium groups across the state of South Carolina are interviewed individually, in focus groups, and through a survey
questionnaire in an effort to isolate the influences that affect their decision-making when implementing policy.

The researcher proposes that the interpretations and decisions of these special education directors are heavily influenced by legitimacy, rather than efficiency or rationality (DiMaggio & Powell, 1983). The researcher further proposes that legitimacy pressures are more intense and spread faster when directors are networked with other directors (Westphal, Ranjay, & Shortell, 1997).

**Research Questions**

Technical literature is foundational to the research questions provided for the purpose of this study. As previously stated, the purpose of this study is to isolate the factors that influence special education directors in the implementation of policy. In an effort to fulfill the purpose of this study, the following guiding questions will be investigated:

1. When a policy is unveiled, *when* do directors of special education obtain information to inform decision-making?
2. When a policy is unveiled, *how* do directors of special education obtain information to inform decision-making?
3. What do directors of special education do with the knowledge once it is acquired?
4. Do isomorphic pressures contribute to a shift in LEA special education directors’ acquisition of knowledge?
5. Does networking foster the spread of institutional pressures?
6. Which of DiMaggio and Powell’s (1983) three isomorphic pressures might have the greatest influence on administrators’ implementation of IDEA? (Coercive, Mimetic, Normative)

Research Design

Participants in this qualitative study include both members and non-members of consortia throughout the state of South Carolina, all of whom are all LEA directors of special education for school districts in the state. In an effort to triangulate the data, individual interviews, individual questionnaires, and focus groups will provide additional information about the factors that influence special education directors in the implementation of federal, state, and local policy at the local level.

Grounded theory is attributed to Glaser and Strauss (1967). This methodology is well structured, yet flexible in that it has explicit collection and analysis procedures while remaining modifiable as new data is derived via other sources (Glaser & Holton, 2004).

Limitations of the Study

Failure to consider validity, reliability and an ethical approach to qualitative research would place limitations on the study. The researcher has considered internal validity by providing for the triangulation of data; conducting member checks; allowing for peer examination; and, acknowledging all biases. The researcher has also provided for external validity by considering the generalizability of the results of this study. Failure to do neither of these may result in limiting the application to other
situations. Likewise, failure to enhance reliability by considering the extent to which the consistency of the findings may be replicated will result in the researcher conducting a study that will not yield the same results repeatedly. Therefore, a systematic approach will be used to reduce the limiting of the reliability of this study. Additionally, as failure to be aware of the ethical issues surrounding qualitative research in collecting and disseminating data is a major limitation, the researcher understands the procedures of conducting a qualitative, grounded study. The researcher’s own values and ethics are the ethical practice within the study. The researcher, as participant and instrument of the research, acknowledges all biases and collects and disseminates data in an ethical manner, and therefore there should be no ethical dilemmas.

Definition of Terms

Consortiums- Serve multiple counties and school districts in South Carolina who collaborate to accomplish specific goals.

Policy- A policy is a governmental plan of action, and when promulgated achieves a goal or responds to a problem in an effort to yield a rational outcome.

Implementation-Hargrove (1982) states that implementation is “first, the actions required by the law are carried out; and second, those actions encompass both formal compliance with the law and organizational routines consistent with compliance” (p. 21).

South Carolina Association of School Board Administrators-“a united alliance of diverse school leaders and the leading force for public education in our state, is to advocate for a superior education for the citizens of South Carolina by influencing
education legislation and policy, stimulating and fostering support, building successful coalitions, ensuring a cadre of effective leaders, and providing programs and services for members” (SCASA, 2007).

Council for Exceptional Children-“The Council for Exceptional Children (CEC) is the largest international professional organization dedicated to improving educational outcomes for individuals with exceptionalities, students with disabilities, and/or the gifted” (CEC, 2007). CEC advocates for appropriate governmental policies “and helps professionals obtain conditions and resources necessary for effective professional practice” (CEC, 2007).

Isomorphism- Organizations having the same form or appearance. Some scholars refer to this as organizational homogeneity. The three isomorphic pressures are mimetic, normative, and coercive. Organizations reduce uncertainty by imitating the behavior of prestigious peers, which is referred to as mimetic. Normative pressures result from an effort to maintain professional standards as constraints are placed on organizations to ensure goals are commensurate with greater societal values. Coercive pressures are the organization’s subjectivity to regulations, licensing, and accreditation.

Excent- Computer software program used by the SCDE-OEC to write and store IEPs and LEA data on students served under IDEIA.
Organization of Study

The literature will be reviewed in Chapter 2. The organization of the review will include a history of special education and special education law, preparation required for special education leadership, the role of the special education director, the theoretical framework, and relevant research.

Chapter 3 will address the design and methodology of the research project. The procedures for reducing and interpreting the data within a qualitative study will be discussed as pertinent to grounded theory and will include Strauss and Corbin’s (1990) data analysis steps.

Chapter 4 will reveal the findings of the study. An analysis of the findings will be presented in the form of a narrative, telling the story grounded in the data.

Lastly, Chapter 5 will summarize and report the findings. These findings will be supported by the vital information included in Chapters 2, 3, and 4.
CHAPTER TWO

LITERATURE REVIEW

Theoretical Framework

IDEIA was signed into law in December, 2004 and the findings set forth in the President’s Commission’s reports became the focus of these new federal regulations. State departments of education and LEAs began examining the impact of new federal regulations with respect to their responsibilities as implemented timelines were revealed. As with any new policy, time was of the essence and immediate provisions for interpretation, compliance, and implementation needed to be orchestrated, hence the increased importance of the role of the director of special education.

IDEIA evoked nonnegotiable change. Although the legislation is specific in what it mandates, the law is vague in providing concrete direction for LEA directors of special education. Directors must interpret the law and shoulder the burden of deciding the best methods for implementation based on their interpretations. As directors seek legitimacy, networking begins and ideas migrate across districts. Meanwhile, evaluation of LEAs’ choices rests with the federal and state bodies charged with overseeing compliance using the indicators set forth in the law.

Prior to the passage of IDEIA in 2004, compliance with federal regulations focused on documenting service in paperwork, which was relatively easy to monitor. Court battles raged over services that were provided either incorrectly or not at all, which proved difficult to monitor, especially in the short run, as due process was needed to
settle disputes. With the focus of IDEIA being on learner outcomes and early intervention, compliance became even more difficult to measure and monitor. LEA directors have taken this obstacle into consideration when making decisions for their districts about how to best implement the new reauthorization of the law. Both state and federal funding may be revoked if districts are found to be noncompliant and have not made strides to make corrections in a timely manner, so the stakes are high.

Educational processes and administrators’ decision-making spawned from new mandates are more effectively understood when viewed through the lens of institutional theory. “Institutional theory is driven by the problematic of why different organizations operating in very different environments, are often so similar in structure” (Zucker & Tolbert, 1994, p. 1). Given Zucker and Tolbert’s archetypical statement about institutional theory, it is not presumptuous to conclude that the influence of the broad environment determines the boundaries of legitimate policy in specific schools. Additionally, institutional theory is grounded in human need for legitimacy or the quest to be perceived as effective. Notions of legitimacy often are based on informal perceptions that diffuse through a system by means of various network structures.

As LEAs comply with the new regulations and policies, autonomous levels of discretion will be bestowed upon directors of special education, resulting in their authority to adopt models associated with success regardless of the outcome, as they strive to attain legitimacy rather than thriving on competition or seeking efficiency (DiMaggio & Powell, 1983; Meyer & Rowan, 1977).

As it pertains to IDEIA, investigating the diffusion of knowledge through the lens of institutional theory yields an explanation of institutional isomorphism; institutions
succumb to legitimacy pressures (DiMaggio & Powell, 1983). When school districts implement federal mandates, states give the authority required for implementation to the district. This results in LEA directors of special education making individual decisions for their districts as they deem appropriate. Often, the quest for legitimacy drives this decision-making.

Suchman (1955b) puts forth this definition: “Legitimacy is a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions” (p.574). When directors of special education are faced with devising new forms, implementing new programs, interpreting the regulations, and purchasing new curriculum and software, the pressure of being perceived by their stakeholders as legitimate is a priority. Often, these local directors do not problem-solve utilizing the expertise within their districts; instead, they look to see what choices other districts make and the implications and ramifications of these choices.

Galaskiewicz and Wasserman (1989) found that leaders in organizations do seek legitimacy and stated that they will continue to seek means outside the organization in search of models with which to satisfy the need to conform to mandates and ensure legitimacy, even at the risk of noncompliance and desired outcomes. In American education, the leaders responsible for implementing policy and procedures governing special education are the directors of special education and the organizations are the local school districts. Upon the adoption of new mandates, diffusion of knowledge may initially spread as a result of the awareness of required performance, but uncertainty and the craving for legitimacy overpower the desire to simply meet performance requirements

Within institutional theory there are three isomorphic pressures that dictate behavior exhibited by humans in their quest for legitimacy (DiMaggio & Powell, 1983). Institutional isomorphism illustrates how behavior is diffused by means of coercive, mimetic, or normative pressures, thus causing organizations to look alike (DiMaggio & Powell, 1983, 1991).

Human ecologist Amos Hawley (1968) first applied isomorphism to organizations. He stated that organizations with similar environmental conditions and that interact frequently have like forms of organizations (Scott, 2001). Although school districts and directors of special education struggle for legitimacy, it is uncertain which of the isomorphic pressures (coercive, mimetic, and normative) might shape administrators’ knowledge of IDEIA.

Coercive pressures (DiMaggio & Powell, 1991) reinforce conformity of procedures through subjectivity to regulations, licensing, and accreditation. So, for example, by following the coercive provisions of federal and state mandates for IDEIA, LEAs procedures tend to become isomorphic (DiMaggio & Powell, 1983).

On the other hand, mimetic pressure grants the reduction of uncertainty within an organization by imitating behaviors of prestigious peers after careful examination of their performance (DiMaggio & Powell, 1991). DiMaggio and Powell (1991) state that mimesis is often a means by which inferior districts seek legitimacy by appearing to act
rationally as they adopt identical procedures after carefully scrutinizing actions of their peers.

Normative pressures are imposed on districts as they seek organized methods of efficiency in an effort to maintain desired levels of order. This positions them to interact with like organizations and be perceived as legitimate (DiMaggio & Powell, 1991). Therefore, membership in professional associations, while striving to meet the goals of accreditation and certification requirements, are vital to districts seeking to maintain professional standards.

This study also reveals the relationship between legitimacy and networking. “DiMaggio and Powell (1983) stressed the importance of palpable network connections that transmitted coercive or normative pressures from institutional agents such as the state and professional bodies, or mimetic influences stemming from similar or related organizations” (p. 6) (quoted in Scott, 2004). Laws themselves force coercive isomorphism; pursuing legitimacy and power yields mimetic isomorphism (DiMaggio & Powell, 1983); and, normative pressures place constraints on organizations to ensure that their goals are commensurate with greater societal values (Scott, 2001). Might one pressure have a greater impact in shaping administrators’ decision-making?

New policy is laden with the task of disseminating knowledge. This diffusion of knowledge most probably will take place through some form of networking and directors of special education may benefit from network ties and membership. O’Toole (1997) revealed that networking is becoming all the more important because policies involving complex issues require networking for execution. March (1994) argued that organizations with established network ties have an increased likelihood of utilizing these sources and
relying on the information obtained, which results in networks increasing their rate of
isomorphism, therefore yielding more intense legitimacy pressures in the context of a
network.

When organizations are members of a network, information is disseminated
among the constituent organizations (Rogers, 1983). Networks speed up the process of
institutional isomorphism, and ties to other networks indicate an increased likelihood that
members of the network will receive information from other members and place more
weight on the contents therein (March, 1994). Kadushin (2004) defined a network as a set
of relationships between two or more individuals. When considering these relationships,
the relational ties, linkages or connections, between the actors is of utmost importance
(Wasserman & Faust, 1994).

Wasserman and Faust (1994) offer examples of relational ties as exchanges or
flows, behavioral interactions, affiliations, acquaintances, and associations, and the
surmising of members. Granovetter (1973) revealed that the strength of these relational
ties cannot be discounted. Strong ties are prevalent between like individuals and result in
an exchange of redundant information, whereas weak ties bridge networks and provide a
conduit for diffusion of new information (Granovetter, 1973). Herein lies another
problem: most LEA directors of special education are members of small local networks
referred to as consortiums and work in close proximity to one another, reinforcing
redundant information exchanges across strong ties. These relationships, the researcher
proposes, enhance the mimetic isomorphic process.
Relevant Research

A qualitative investigation, that isolates the factors influencing special education directors in the implementation of federal, state, and local policy at the LEA level, will be conducted with grounded theory methodology. A review of the literature reveals that although studies have been conducted involving institutional theory and policy implementation, no studies to date have considered networking and isomorphism as potentially influencing policy implementation.

Westphal, Ranjay, and Shortell (1997) conducted a quantitative study in which they looked at conformity versus customization and the consequences of Total Quality Management (TQM) adoption. More specifically, their theoretical framework comprised an “institutional and network perspective”, investigating the adoption of administrative innovations. Their focus was on the rate and timeliness of adoption on institutional processes and benefits. This study was conducted over an eight-year period in hospitals, but its findings have implications for LEAs and are pertinent to this study as these same institutional pressures are felt in education; however, their study has not been replicated in the substantive context of education.

Hanson (2001) argued that institutionalization results in cookie-cutter schools because school districts do not want to be perceived as preserving the status quo, so he investigated organizational memory, learning, and change. What he found was that one could take on the persona of a reformer without seemingly affecting real change. However, he points out educational systems change, but at a pace that is not commensurate with reform advocates’ wishes. What Hanson (2001) did not consider is
which of DiMaggio and Powell’s (1983) three isomorphic pressures (mimetic, coercive, and normative) has the greatest influence on special education directors’ implementation of IDEIA or the role networking plays in fostering the spread of isomorphism. The present qualitative investigation isolates the factors influencing special education directors in the implementation of federal, state, and local policy at the LEA level.

Additional studies have analyzed policy adoption, change, and leadership styles of administrators responsible for policy implementation, yet none of these studies consider isomorphic pressures and networking influences. Hargrove (1982) concluded that compliance with P.L. 94-142 was not commensurate with implementation, which concurred with the previous findings of Hill (1979), Wise (1979), Stearnes, Greene, and David (1980), Diver (1980), Elmore (1981) and Yudof (1981). Compliance does not ensure sound practices and effectiveness. Many programs function within the realm of the law, but may not be particularly effective. McLaughlin and Elmore (1982) encourage further research to investigate whether networks can be used to increase the competence of practitioners, which has not previously been studied. Hence, there is a need to investigate the isomorphic pressures and networking ties influencing directors who are making decisions for implementation and daily practice occurring within their districts.

**History of Special Education and Law**

Throughout history, there are numerous milestones that highlight events, people, and legislation (Disability History, 2007). This rings true in special education across the United States and in the state of South Carolina. Understanding the rich history of
disability rights is the underpinning for understanding current federal and state legislation affecting persons with disabilities and those who provide services for the disabled under these lawful mandates.

In the early 1960s, the disabled community took its cue from the civil rights movement; hence, the disability rights movement. During this movement, myths that persons with disabilities were incapable of being educated and contributing to society were challenged. Access to education became a battleground. Parents fought for a federal guarantee that their disabled children would be educated in public schools, while disabled students fought to attend public universities. The disability rights movement orchestrated and implemented profound social changes (Disability History, 2007).

Although milestones advancing the rights of disabled persons are documented as early as 1817, the disability rights movement itself did not exist, and thus did not have a profound impact on public policy until the first major inroads occurred in 1975 and 1990 (Disability History, 2007). These dates marked the beginning of philosophical change in many services, rights, and legislation afforded to disabled citizens. Perhaps the greatest impact is reflected in the educational opportunities mandated as a result of the movement.

As early as 1848, disabled persons received attention with the founding of The Perkins Institution, the first institution for the mentally retarded (Osgood, 2008). Through the 19th century, disabled children and adults were institutionalized for years, many for life. Indeed, in the 1920s, the rights of disabled persons were dealt a substantial blow when the United States Supreme Court ruled in Buck v. Bell 274 U.S. 200 (1927) case, the constitutional rights of the disabled were not violated in instances when they were subjected to forced sterilization (Winzer, 1993).
Before long, World War II began and the treatment of disabled persons continued to be considered inhumane by many. In 1939, Hitler ordered the mass killing of the sick and the disabled. Aktion T-4 was used to euthanize “undesirable” life (Disability History, 2007). The 1940s, however, eventually brought about some positive changes for the disabled. In 1945, President Harry Truman signed a law promoting employment of the handicapped through National Employ the Handicapped Week. Likewise, the National Mental Health Foundation was founded and the attacking deplorable conditions in mental institutions, which inspired the onset of deinstitutionalization (Disability History, 2007).

As a result of these developments, the 1950s and 1960s saw many additional changes due to various social movements and general cultural trends; civil rights, self-help, deinstitutionalization, demedicalization, and consumerism. In 1950, a federal director for vocational rehabilitation was appointed by President Truman and independent living was encouraged (Disability History, 2007). In 1954, the United States anticipated the Supreme Court’s ruling in the landmark civil rights case Brown v. Board of Education of Topeka, 347 U.S. 483 (1954). In Brown, the Court ruled that explicitly separate schools for blacks and whites were unconstitutional, a decision that dramatically expanded the legal reach of civil rights in the United States (Brown, 1954; Winzer, 1993). During this time period, federal grants were being made available to expand programs for the disabled. The Social Security Act of 1935 was enacted, and in 1956, Social Security Disability Insurance was implemented (Disability History, 2007; Winzer, 1993). President John F. Kennedy instituted many policy changes regarding the disabled over the course of a short time. In 1961, he appointed a panel to investigate the status of mental retardation (Osgood, 2008). In 1962, the lawsuits of two gentlemen, who wished
to gain admission to universities marked changes for both the physically disabled and for blacks, as both succeeded in winning their cases. Edward Roberts was confined to a wheelchair and attended the University of California as the first disabled student enrolled in higher education. James Meredith was the first black gaining access to a college education and he attended the University of Mississippi. Perhaps the years of 1963 and 1964 spawned the biggest turn of events of all. President Kennedy was successful in prompting deinstitutionalization and increased community services while President Johnson followed suit by signing the landmark 1964 Civil Rights Act prohibiting discrimination. In 1965, Medicaid and Medicare were established, both of which benefitted the disabled in various ways (Disability History, 2007).

The 1970s ushered in continued change on behalf of the disabled. Mass transit vehicles were retrofitted to accommodate wheelchairs and the first legal advocacy center for disabled persons, The National Center for Law and the Handicapped, was founded (Disability History, 2007). The federal cases of Mills v. Board of Education 348 F.Supp. 866 (D. DC 1972) and PARC v. Pennsylvania 334 F.Supp. 1257 (E. D. PA 1972) both mandated that disabled students could not be excluded from public schools (Mills, 1972; PARC, 1972). In 1973, The Rehabilitation Act was passed; Section 504 addressed discrimination against the disabled. It was also in 1973 that the first handicapped parking stickers were introduced, and 1977 marked the 504 sit-in held in a federal office building in San Francisco. Disabled protestors held the sit-in for nearly four weeks which led to the enactment of Section 504, an arm of The Rehabilitation Act mandating that those receiving government funding provide public access for the disabled (Disability History, 2007).
Overall, the events of the 1970s, particularly the rulings in the two court cases mentioned above, persistent efforts by parent groups and other organizations, and Congress’ concern that over half of the nation’s 7 million disabled children were not receiving appropriate educational services and another million were receiving no services at all, led to the passage of PL 94-142 (The Education of All Handicapped Children Act) (Winzer, 1993). President Gerald Ford signed PL 94-142 into law on November 28, 1975. PL 94-142 was the legislation that first impacted the education of handicapped children in American public schools (Osgood, 2008; Winzer, 1993). Parents finally had a federal guarantee that their children would receive an education when the Supreme Court ruled in its first special education case, Board of Education of Hendrick Hudson Central School District v. Rowley 458 U.S. 176 (1982). This decision defined a free appropriate public education (Board of Education, 1982).

With the passage of PL 94-142, the position of the special education director was born and school districts began employing directors to govern special education. The position of the special education director instantly became more and more important in all districts. For the first time, all students were entitled to a free public education. However, the degree to which an education and services were provided to handicapped children varied across all school districts. The passage of PL 94-142 did not ensure that all districts would comply or comply in a timely manner. The federal government did not monitor LEAs or new directors’ decision-making, and compliance with PL 94-142 was left to the discretion of LEA special education directors. Handicapped students in many districts continued to be denied access to a public education and others were never identified as needing services. The law was specific in prescribing entitlements for
disabled students, but there was no guidance given to LEA special education directors on how to provide services and comply with the law.

Although many grassroots efforts of the 1980s continued to advocate for the rights of disabled persons, lobbying efforts successfully blocked many attempts to revoke or amend legislation. It was not until 1990 that President George H. W. Bush signed the most comprehensive piece of disability rights legislation in history, The Americans with Disabilities Act (Individuals with Disabilities Act, 1990). Shortly thereafter, PL 94-142 was amended and renamed the Individuals with Disabilities Education Act (IDEA) (Education for All Handicapped Children, 1975).

Court battles to ensure the enforcement of IDEA were ongoing. Holland v. Sacramento City Unified School District 786 F. Supp. 874 (E.D. CA, 1992) is an example of a case aimed at enforcing the rights of disabled students to attend class with non-disabled students as mandated in IDEA. As the result of continued lobbying by parent activists, Congress reauthorized IDEA in 1997. Changes favored continuing rights of disabled students and their families shifting the focus from access to quality (Individuals with Disabilities, 1997; http://www.wrightslaw.com/law/reports/IDEA_Compliance_6.htm).

Special education law has now been developed for over thirty years. Since this time, the Supreme Court has heard few cases relating to special education. However, the court cases cited above are evidence that laws protecting services for disabled students have been upheld as constitutional. The Supreme Court ruled in the case of Schaffer v. Weast 546 U.S. 49 (2005) that the burden of proof in IDEA-related cases rests with the
party who brings the case. Since, parents are almost always the party bringing IDEA-related legal challenges, so school districts across the country viewed the Court’s ruling in *Schaffer* as a victory (http://www.wrightslaw.com/law/caselaw/08/11th.jdraper.atlanta.htm). As time has marched on, rulings have not always sided in favor of the parent as many earlier cases signified.

The Forest Grove School District of Forest Grove, Oregon was added to the Supreme Court docket for this term on January 16, 2009. This is a special education case desiring to settle a special education dispute over reimbursement to parents for private schooling. This case falls on the heels of a similar case heard by the Supreme Court in 2007 in which the Court was evenly split in their decision due to Justice Anthony Kennedy electing not to participate for unsighted reasons. Forest Grove wanted the Supreme Court to hear their case since the prior ruling in the New York case rendered no decision regarding private school reimbursements to parent. Funding privately placed special education students is costly to districts. LEA superintendents and directors of special education will await the decision of the Supreme Court in the case of Forest Grove School District (http://www.wrightslaw.com/blog/?p=142).

The most recent reauthorization of IDEA occurred in 2004 as the result of President George W. Bush appointing a President’s Commission on Excellence in Special Education in 2001. Current special education practice was studied and a report rendered that recommended reauthorization. As a result of the Commission’s efforts, two reports were issued: *Rethinking Special Education for a New Century* (2001) and *A New Era:

These reports indicated that current practice focused on compliance based special education. Compliance of procedures, documentation, and regulations were the focus. Also cited as problematic was the “wait until they fail” type of identification process, stressing the importance of prevention and early intervention as ways to help with over-identification, the marriage of general and special education, and the need to make funding contingent upon outcomes. These findings are reflected throughout new regulations in the Individual with Disabilities Education Improvement Act (IDEIA) of 2004 (Yell, 2005; Apling & Jones, 2005). Directors of special education now have the arduous task of sustaining compliance with federal and state mandates as well as the new responsibility of accountability for learner outcomes and early intervention.

Preparation for Special Education Leadership

Responsibility for complying with legal mandates lends added significance to the qualifications required to serve in the role of an LEA director of special education. Implementation of the requirements set forth in IDEIA rests on the shoulders of LEA special education directors. In 1990, Hirth and Valesky’s quest to glean information regarding the requirements that states mandate their administrators acquire, regarding special education and special education law, yielded surprising results. Having surveyed state special education directors, Hirth and Valesky found that 33 percent of administrative certification programs required knowledge of special education law and 45 percent required general knowledge in special education. Their surveys of institutions of
higher learning across the United States revealed similar results regarding requirements for administrative certification: “It does not appear that universities provide through administrator preparation programs sufficient time for students to adequately comprehend the regulatory requirements and case law encompassing special education” (Hirth & Valesky, 1990, p. 171).

Hirth and Valesky’s results are indicative of some of the underlying issues affecting special education in South Carolina today. South Carolina gives LEAs the autonomy to determine the academic degree required for one to serve in the capacity of a local special education director. Academic requirements vary just as the division of responsibility defined by individual job descriptions and titles varies across school districts. Among administrators responsible for special education within districts, some serve with the title of coordinator, some as director, and some as assistant superintendent. Minimally, administrative certification is required to serve in any of these capacities across all districts; however, additional responsibilities in special education often require specialist and doctorate degrees.

Once a new director attains the title of director of special education, the South Carolina State Department of Education provides training through its New Directors Training program. This yearlong program is taught as a graduate course through a local branch of a state university or college. It rewards three hours of graduate credit and provides new directors with general knowledge of special education policy, procedures, and law.

Currently in the state of South Carolina there is no uniform number of years of experience required to serve as a LEA director of special education. This qualification is
left up to the discretion of local districts as is the certification area of prior degrees and areas of previous experience. Yet, no matter what one’s title, area of certification and experience, degree, or number of years in education may be, all persons responsible for special education in local districts are charged with the implementation of federal, state, and local policy.

**Role of the Special Education Director**

Just as the qualifications to hold the position of a LEA director of special education are determined by individual districts, so too are the duties and responsibilities of this position. Although there are numerous duties and responsibilities assigned to directors of special education, included in this chapter are those relevant to this study and most salient across districts. This information was gleaned from directors of special education across the state of South Carolina.

Performance responsibilities of LEA directors of special education specify that the individual:

1. Communicates and provides leadership for implementing best practices;
2. Evaluates the effectiveness of the special education program on a continuous basis;
3. Works cooperatively with the school and district staff in the continuous improvement of student achievement in special education;
4. Provides leadership toward achieving school and district accountability and strategic goals;
5. Develops and implements procedures for special education programs;

6. Determines the need for new programs and services;

7. Interprets federal and state laws, regulations, rules, and policies affecting special education services;

8. Ensures compliance with all state and federal mandates, laws, regulations, rules, and policies;

9. Works with community service agencies and non-public schools to meet the requirements for formal legislative mandates; and,

10. Develops forms and systems of data collection to meet federal mandates.

Historically in the state of South Carolina, it has been the local school districts that determine the qualifications and duties of the director of special education. The researcher has documented local district autonomy for the purpose of revealing the varying degree of knowledge, experience, and education needed to hold this important position and to shed light on the impact of an insufficient capacity in any of these areas on the decision-making of directors of special education.

Preparation for special education leadership and the role of the director of special education as defined by individual districts, impact implementation of policy and procedures. The capacity of the director affects the capacity of the office and influences the director’s decision-making when faced with interpreting and responding to new regulations.

In summary, the theoretical framework put forth and the historical account of the evolvement of disability rights reveals the complexity of decision-making facing
directors of special education. The implications associated with implementing federal, state, and local policy and procedures may have legal ramifications that can be costly in districts where there is poor decision-making. Directors of special education encounter significant pressures when making decisions. The more prepared and experienced the director, the greater the probability of the director’s sound decision-making.

Chapter 3 discloses how grounded theory is used to document existing frameworks, illustrate and explain how procedures are used in the field, and offer solutions derived from gathered data (Selden, 2005).
CHAPTER THREE

RESEARCH METHODOLOGY

Purpose of Study

The purpose of this study is to isolate the factors that influence special education directors in the implementation of policy. When a policy is developed or reauthorized, directors of special education face the arduous task of obtaining information and acting upon it. DiMaggio and Powell (1991) state that LEA personnel responsible for interpreting and implementing new policy strive to gain legitimacy; mechanisms of influence characterized as coercive, mimetic, and normative pressures are the conduits by which legitimacy may be achieved. Which of these pressures have the greatest influence on special education directors in the implementation of federal, state, and local policy at the local level?

For the purpose of this study, the researcher proposes that the interpretations and decisions of these special education directors are heavily influenced by legitimacy, rather than efficiency or rationality (DiMaggio & Powell, 1983). The researcher further proposed that legitimacy pressures are more intense and spread faster when directors are networked with other directors (Westphal, Ranjay, & Shortell, 1997).

The following guiding questions were investigated:

1. When a policy is unveiled, when do directors of special education obtain information to inform decision-making?
2. When a policy is unveiled, how do directors of special education obtain
information to inform decision-making?

3. What do directors of special education do with the knowledge once it is acquired?

4. Do isomorphic pressures contribute to a shift in LEA special education directors’ acquisition of knowledge?

5. Does networking foster the spread of institutional pressures?

6. Which of DiMaggio and Powell’s (1983) three isomorphic pressures might have the greatest influence on administrators’ implementation of IDEIA?

1. Mimetic Pressure

2. Normative Pressure

3. Coercive Pressure

Participants

The state of South Carolina has 85 school districts. The target population of this study is the local directors of special education, and in some districts the coordinators, within these 85 districts. For the purpose of this study, participants were both members and non-members of consortia throughout the state of South Carolina, all of whom are all LEA directors or coordinators of special education for school districts in the state.

Consortiums have been intentionally selected for variety based on formal structure.

The investigation of these consortia revealed that three educational consortiums in South Carolina are organized in a formal manner and employ a director and
administrative assistant. Within these consortia, the superintendents of the member districts comprise board membership and ultimately employ the director.

There are other informal non-consortium groups that meet monthly, but govern themselves and set the calendar and agenda, without assistance from a director. Many of these groups refer to themselves as consortiums, but exist without a formal structure and recognition from the South Carolina State Department of Education. Some of these are the five Anderson districts, Oconee, and Pickens (AOP) group, the Spartanburg group comprised of the seven Spartanburg districts, and the Midlands Area Consortium (MAC) in and around the Columbia area. There is also an Upstate Consortium located at Furman University in which districts pay to be members, but the sole purpose of this group is to provide staff development by means of pooled resources.

In the present study, other participants included three education administrators (the current state director of exceptional children, the spouse of the current state superintendent of education, and a current assistant superintendent for a local district in this state), each of whom has experience implementing policy and being responsible for special education programs. These three administrators examined the questionnaire for content validity and usability. Their brief vitas may be found in Appendix A. Additionally, district-level administrators in a local school district in South Carolina field-tested the questionnaire and interview questions.

Participants in the study were members from consortiums whose identity will be protected to ensure participant anonymity. Consortia will be referred to as Consortium A and Consortium B. These two consortiums were selected on the basis of the similarities of their formal structure and organization as well as for variety. The non-consortium
group will consist of districts that may network with other districts, but in an informal manner and not under the direction of the formal structure of a defined consortium.

**Research Design**

A qualitative study isolating the factors influencing special education directors in the implementation of federal, state, and local policy at the LEA level was conducted with grounded theory methodology. Grounded theory is attributed to Glaser and Strauss (1967). This methodology is well structured, yet flexible in that it has explicit collection and analysis procedures while remaining modifiable as new data is derived via other sources through constant comparison (Glaser & Holton, 2004). Grounded theory is an inductive means by which theory is generated and confirmed as it emerges from real world interaction.

Today, there are three recognized grounded theory designs. Glaser (1992) coined the Emergent Design whereby theory is built using the constant comparative method by examining relationships among the emerging categories. Strauss and Corbin (1998) labeled another grounded theory design as Systematic. The foundation of this design is a systematic design much like Glaser’s, but Strauss and Corbin’s design includes the procedural steps of open, axial, and selective coding which produce theory depicted in a visual model. The Constructivist Design distinguished by Charmaz (2000) examines the lives of participants and what gives meaning to them. A narrative explains their emotions as they experience a phenomenon. For the purpose of this study, the systematic design was employed and open, axial, and selective coding were used to discover theory (Creswell, 2005).
Data were gathered through individual interviews, individual questionnaires, and focus groups to permit analysis of factors influencing special education directors in the implementation of federal, state, and local policy at the local level.

Individual interviews were conducted with six special education directors from Consortium A, six special education directors from Consortium B, and six special education directors who are not members of a formal consortium. Directors were selected using the random selection process of alphabetizing the membership roster and beginning with person one, selecting every other name until six willing participants were selected. As participants were identified and approached about participating, there were some who refused and some who reluctantly participated. Participants expressed a strong desire to remain anonymous, which affected revealing the identity of the formal consortium groups by name.

Focus groups were used as the second leg of triangulation and included twelve special education directors: four from Consortium A, four from Consortium B, and four from the non-consortium group. These participants were selected by default based on the remaining members of the consortium and non-consortium groups who were not selected for individual interviews. Participants were allowed to participate in both individual and focus groups to meet the number required for focus group participants. A combination of the questions used for interviewing and the questionnaire were used to elicit information.

The third leg of triangulation consisted of a survey questionnaire mailed to all districts across the state of South Carolina and contained twenty questions to be answered using Likert scales: answer choices were uniform, providing participants with the choices of strongly agree (SA), agree (A), disagree (DA), and strongly disagree (SD) for each
question. Participants receiving the Likert questionnaire were persons listed on the State website as either a director or coordinator of special education. Larger districts often employ a director of special education and coordinators responsible for either certain schools within the district or specific grade levels. Coordinators responsible for either elementary, middle, or high school divisions are the most widely used in the state of South Carolina. A total of ninety-nine questionnaires were mailed with a sixty percent response rate.

Data collected during the individual interviews were compared for similarities and differences. This procedure included the use of Strauss and Corbin’s (1990) open, axial, and selective coding. During the coding process, categories were determined and patterns sought. Memos were the link that moved the focused codes to conceptual categories. The end product was assessed on fitness, understanding, generality, and control (Glaser & Strauss, 1967). Data from the surveys was analyzed and used to support the data collected in the interviews.

Although there were no preconceived notions and biases, it is necessary to state that the researcher has held the position as a local director of special education in the state of South Carolina and is familiar with many of the current LEA directors of special education. Likewise, it is worth noting for purposes of reliability and validity that the researcher understands that during interviews, leading questions are not permissible. The researcher has been trained how to use probes and prompts effectively without leading participants toward desired responses.
Procedures

A questionnaire was constructed by formulating objectives and questions, reviewing necessary information, and listing variables to be collected. Interval measurement was applied by use of a Likert scale. A response format was used with the Likert scale in which participants circled their answer choices. Questions were clear, short, accurate, not offensive, fair, unambiguous, and included content that respondents were expected to know.

Three experienced administrators (Appendix A) were selected to review the instrument and indicated whether each individual item on the questionnaire supported the guiding questions by answering met, partially met, not met, or not applicable for each. These administrators were: Susan Durant, current state director of exceptional children programs, Dr. Susan Smith-Rex, spouse of the current state superintendent of education for South Carolina, and Betty Jo Hall, current assistant superintendent for a local school district in South Carolina. These experienced administrators also rated the overall research instrument by responding with met, partially met, not met, or not applicable to the following statements regarding the questionnaire: understandable instructions; neat and user-friendly format; concise, yet comprehensive structure; and, a clear method of response.

These same three administrators were each mailed a cover letter (Appendix D), a copy of the validation instructions (Appendix E), and a copy of the questionnaire (Appendix C). Once the researcher received feedback from each of the evaluators, minor adjustments were made and feedback was once again solicited. The minor adjustments
included the re-wording of one question, correcting a grammatical error, and addressing whether a question should be omitted. Once the questionnaire was validated, the researcher proceeded with distributing it to the LEA directors across the state.

Participants from the 85 school districts in South Carolina were chosen to receive the questionnaire after being identified by accessing the South Carolina State Department of Education website (http://ed.sc.gov/agency/Standards-and-Learning/Exceptional-Children/old/ec/page1395.html). Special education directors and coordinators were listed under the Office of Exceptional Children. A cover letter (Appendix B) and a questionnaire (Appendix C) were mailed to these 99 participants listed on the state website as persons responsible for special education in their respective districts. For large districts, a director and several coordinators were listed. In an effort to maximize the potential sample size, all persons listed on this website as having responsibility for special education in their district were mailed a questionnaire.

Questionnaires were mailed with the enclosures identified above and also included a stamped envelope addressed to the researcher’s administrative assistant. As blind questionnaires were returned to the administrative assistant, she stapled the envelope to the questionnaire and numbered them in the order they were received and opened. Although there was no identifiable information to ensure anonymity, the envelopes were stamped with the name of the postal area from which they were mailed.

This identifying information, along with participants stating the size of the district in which they work when providing a demographic answer on the questionnaire, gave the researcher an approximation of geographical location. The researcher noted this for anticipation of possible identification of local and regional consortium membership.
Questionnaire responses were tallied and placed aside for later comparison with interview data.

The offices of Consortium A and Consortium B organize peer group meetings. The groups are comprised of directors from member school districts. These groups meet monthly to discuss issues of concern, share ideas and solve problems. Consortiums hold meetings for directors in the following groups: Adult Education, Finance, Human Resources, Instructional Leaders, Operations, Public Information, Special Education, Superintendents, Technology, and Transportation. Obtaining dates for these group meetings proved vital for the interview process.

For the purposes of triangulating the data, there were two types of interviews: individual and focus groups. Once the two consortium and one non-consortium groups were identified, participants for the individual interviews were selected by using a systematic random sample. This is a sample that was drawn from a numbered list on which participants were selected near the top of the list with every $n^{th}$ name selected afterwards. Each consortium listed member districts in alphabetical order on their websites which made it easy to use the systematic random sample.

The directors selected for individual interviews were chosen by systematic random sampling. If an identified director was either not available, or chose not to participate, the same process was used with selection beginning back at the top of the list. The researcher started with the first name on the list and selected every third name until a pool of participants had been established.

Participant numbers were affected by the willingness of directors to participate. The formal consortium groups each had a membership roster of nine and ten respectively.
The initial target of six individual interviews from each group left a small pool for focus groups especially when considering the number of unwilling participants. The non-consortium group turned out to be an informal group that had a membership of seven directors. The total participating from each of these groups was seven, seven, and seven. However, within these seven, some consented to focus groups only while others participated only in individual interviews or both individual and focus groups.

The participants in the focus group interviews were then selected by default. These participants were the members of the consortiums who were not selected for individual interviews. For the non-consortium group, the same process was followed and participants in the focus group were those who were identified as being members of the same informal networking group.

Both individual and focus group interviews were conducted using the same procedures. Participants were given a copy of the required IRB focus group informational letter (Appendix F) and individual informational letter (Appendix G). The interview script (Appendix H) was followed and participants selected pseudonyms before answering questions (Appendix I). Participants were then asked to grant permission for the interview to be tape recorded. The interview script was followed and probes were used to gain more in depth information.

Procedures for conducting the individual and focus group interviews followed Spradley’s (1997) questioning format. This format encouraged the interviewer to beginning with grand tour questioning and moving to mini-tour questioning, followed by probes. Grand tour questioning took a tour of the participant’s feelings and used the open-ended question “When you think about IDEIA, what are you concerned about?”
Mini-tour questioning focused on one example given by the participant and discussed it further such as “Could you say something more about that?”, “Can you give a more detailed description of that?”, and “Do you have further examples of this?” Probes investigated deeper understandings. For example, “You hesitated before answering”, “I think you have already answered this, but do you want to add anything else?”, and “When is the last time you saw someone do that?”. This format was used to guide the interview process, thus allowing for an overlapping of questions so that the researcher could revisit an earlier question to either elicit more information or to “winnow” unnecessary questions (Charmaz, 2000: p. 32).

Once all interviews had been conducted, the process of coding began. The first step was to read through the data from the interviews and begin to develop coding categories. Data collected during the interviews was compared for similarities and differences. This procedure included the use of Strauss and Corbin’s (1990) open, axial, and selective coding. During the coding process, categories reflecting the purpose of the research project were determined and patterns sought. Memos were the link that moved the focused codes to conceptual categories. The end product was assessed on fitness, understanding, generality, and control (Glaser & Strauss, 1967).

Cross-interview analysis was used to group answers from different participants within the respective consortium and non-consortium groups. This was a line-by-line analysis designed to generate initial categories and to reveal relationships across categories and their subcategories. In the line-by-line analysis, provisional code names were assigned to the developing categories. Memos were kept to note additional thoughts and insights. Once a category became evident, axial coding began and core categories
were identified. Through constant comparison of the content within the categories, the properties of the categories were defined conceptually and related to each other. This is what Strauss and Corbin (1998) have defined as open and axial coding.

Next, the data were reanalyzed based on the emerging concepts. This is referred to as selective coding and is where explanations for linking concepts and making comparisons took place. This was a systematic process and this procedure continued until saturation was reached.

The triangulation used in this study increased its validity. Using multiple methods of collecting data neutralized bias. Triangulating the data was very important for checking consistency across various methods of data collection. Inconsistencies noted were examined in an effort to gain deeper insight into the relationship between the data and the content of the study. Reasonable explanations were sought to further understand inconsistencies in the data, while also charting consistencies.

This qualitative study focuses on isolating the factors influencing directors of special education when faced with policy-relevant decision-making. Data were collected through individual and focus group interviews as well as through a questionnaire. Participants were current directors of special education in the state of South Carolina or persons responsible for exceptional children programming within their respective districts. The findings of this study will be reported in Chapter 4.
CHAPTER FOUR

DATA ANALYSIS

Overview

This is a qualitative study isolating the factors influencing special education directors in the implementation of federal, state, and local policy at the LEA level and was conducted with grounded theory methodology. Grounded theory is an inductive means by which theory is generated and confirmed as it emerges from real world interaction.

In this study, data were gathered through individual interviews, individual questionnaires, and focus groups designed to isolate factors influencing special education directors in the implementation of federal, state, and local policy at the local level. Thirteen individual interviews were conducted, sixty out of ninety-nine questionnaires were returned, and three focus groups were interviewed.

Questionnaire

Questionnaire participants were directors and coordinators of special education for local school districts in South Carolina. Participants completed a demographic section soliciting the following information: years experience in education, size of district, years in current position, highest degree earned, and membership in a consortium. Results are shown in figure 1.
<table>
<thead>
<tr>
<th>Demographic Category</th>
<th>Properties</th>
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<tr>
<td>Years experience in education</td>
<td>Average: 24.2</td>
</tr>
<tr>
<td></td>
<td>Fewest: 4</td>
</tr>
<tr>
<td></td>
<td>Greatest: 40</td>
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<tr>
<td>Size of district</td>
<td>Smallest: 700</td>
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<tr>
<td></td>
<td>Largest: 68,000</td>
</tr>
<tr>
<td>Years in current position</td>
<td>Average: 6.3</td>
</tr>
<tr>
<td></td>
<td>Range in years:</td>
</tr>
<tr>
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<td></td>
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</table>

Figure 1: Demographic Results

Figure 1 indicates that although these directors’ average experience in education is 24.2 years, there are educators who have only been in the profession for four years and currently hold the position of director of special education in their local district. The average number of years that current directors have held the position of director of special education in their respective districts is 6.3; however, 59% of directors participating in the survey have held their position as a local director for 0-5 years and 24% have held their current position for 6-10 years. Twenty of these directors hold a master’s degree plus 30 hours; another twenty have either a specialist degree or a doctorate. The lack of experience of these directors is directly correlated to the results of the interview process.
The remaining section of the questionnaire contained 19 items and employed a Likert scale response set. Answer choices for all questions were uniform, providing participants with the choices of strongly agree (SA), agree (A), disagree (D), and strongly disagree (SD) per all 19 questions. The results are found in Appendix J.

Participants agreeing to complete the questionnaire responded similarly to participants responding to interview questions; both sets of data support the cumulative results. The contents of the questionnaire were divided into three basic categories: networking, implementation, and the involvement of the SDE-OEC, which proved to be the supportive underpinning needed to substantiate later results.

Responses to questions relating to networking revealed that before implementing new policy directors overwhelmingly agreed that they consulted with colleagues, other districts, other districts with whom they had a close relationship, and other districts’ practices to inform their decision-making. Directors responded less positively to making decisions based on their own interpretation and knowledge, but indicated positive dependence on curriculum consultants and professional organizations.

Responses to the implementation questions are indicative of directors having sole responsibility for implementation of special education policy. The vast majority of directors feel they are quick to disseminate information to the building-level administrators to whom they present information directly. Directors report reading new policy, regulations and requirements, but seek clarification, if needed, before implementation.

The questionnaire included a question pertaining to direct notification of new policy from the SDE-OEC to local directors, to which directors overwhelmingly reported
getting information from sources other than the SCDE-OEC. A little less favorable, was the response to the question of whether directors rely on assistance from the SDE to assist in decision-making before implementing new policy. Although the majority of directors seek assistance from the SDE-OEC, forty-five of fifty-nine responses either disagreed or strongly disagreed about receiving sufficient assistance, such that no other assistance was required, to implement new policy. Comments included, “There is always more that needs to be done. The state is short staffed. Salaries need to be increased at the state level in order to recruit and retain staff.” Another comment included the words “strongly disagree” with underlining and exclamation marks, and still others with the statements, “Sometimes difficult to contact” and “State Department very slow to disseminate information.”

**Interviews**

Participants in the individual interview process were selected because they belong either to one of two formal consortium groups, or to a non-consortium group. Participants of the focus groups were selected by default. These participants were the remaining group members who were not selected using the random selection process of alphabetizing the membership roster and beginning with person one, selecting every other name until a sufficient number of willing participants were selected.

The targeted number of participants for individual interviews was initially six per group. However, once the research on state consortiums was conducted and fewer formal consortiums existed than anticipated, the membership within each determined the maximum number to be interviewed. The interview process of one consortium yielded
five individual interviews, and the other two yielded four each based on sheer numbers of total membership and consent to participate. The overall membership directly affected the focus group interview numbers as well; however, these focus groups included three to four participants as originally anticipated and all three were conducted. Focus group participants were determined by default and made up of those members not selected for an individual interview. All interview analyses are introduced below in the Coding section.

Coding

*Open Coding*

The results of the questionnaire support those disclosed in the coding process of the interviews. Coding is the systematic process of breaking down data, only to then piece it back together. The first step is open coding. Open coding identifies the initial categories. This process involved a line-by-line analysis to generate initial categories and to reveal relationships across categories captured using words and phrases. In the line-by-line analysis, provisional code names were assigned to the developing categories. Memos were kept to note additional thoughts and insights lending further explanation of dimensions and properties.

Once open categories became evident, axial coding began and a core phenomenon was identified. Through constant comparison of the content within the categories that emerged from the open coding, the properties of the categories were defined and related to each other. Axial coding placed emphasis on causal relationships between categories.
Axial Coding

The core phenomenon and five additional elements generated a framework of generic relationships. These five elements are defined by Strauss and Corbin (1998) as: Causal Conditions, Context, Intervening Conditions, Action Strategies, and Consequences. Causal conditions are those which influence the core. Context is a specific condition and Intervening Conditions are general conditions, of which both influence the Action Strategies. Action Strategies are the actions produced by the core phenomenon while Consequences result from use of the strategies. Once again, the use of memoing was an effective tool for linking thoughts. Strauss and Corbin’s (1998) frame of generic relationships was then utilized and categories yielded from the axial coding were applied. The axial categories were placed in the generic frame and the interactions between the categories are depicted in the diagram in Figure 2.
Figure 2: Axial Coding

The diagram illustrates the relationship of the core phenomenon to the other categories. *Causal Conditions* influence the core, *Unclear Implementation Strategies*, and in this study *Causal Conditions* were determined to be pressures and barriers to policy
implementation. These Causal Conditions had the properties of Timeliness, Ambiguity, and Number of Changes.

The core phenomenon, Unclear Implementation Strategies, was also considered a pressure and a barrier and resulted in directors engaging in Action Strategies, which were identified as Networking and Isomorphism. Context, with properties Background and Will of the Director, and Intervening Conditions, with properties Accountability, Anxiety, Self Interpretation, and Balance all influenced directors’ decisions to engage in the Action Strategies of Networking and Isomorphism. Once the Action Strategies were put into action, the result was the Consequences of De Facto State Policy and Procedure and Legitimacy.

Selective Coding

Selective coding, affords the researcher an opportunity to validate and refine the existing relationships and categories to generate theory grounded in the data. Through systematically following all coding procedures, the following final themes emerged: Pressures and Barriers, Unclear Implementation Strategies, Reactions and Responses, Competence, Survival Mechanisms, and Outcomes. A visual of the model of the theory is shown in Figure 3.

The visual model of theory represents the six themes and each theme’s relationship to the other categories, which emerged from the selective coding process. An explanation of these interrelationships are told through the following story and grounded in the candid verbatim transcripts and emergent categories coded from the data.
Federal law determines the contents of the regulations needed to guide states in drafting their respective state policies and procedures. States interpret the federal regulations and pen their own policy and procedures to guide LEAs. LEAs then depend
on their state’s interpretation of the federal regulations and rely heavily on the guidance of those state regulations to pen their district policy and procedures for use in daily operations. These regulations are foundational to everyday decision-making in local districts because of the legal implications and ramifications of not following federal, state, and LEA adopted policy and procedures that govern special education.

Belated Regulations

The category, Pressures and Barriers, personifies the magnitude of the pressures and barriers placed on LEAs by the SCDE-OEC through the story created across the properties. The property, Belated Regulations, is described as the time lapse between LEAs receiving notification that the reauthorization of a federal law has become official and when finalized state policy and procedures are actually state board approved and disseminated to LEA directors of special education. Directors of special education are charged with ensuring that regulations governing special education programs are implemented in a timely manner to ensure compliance with the law. Roxie expressed her concern over the time it has taken to receive state regulations:

I find it interesting that we are at reauthorization of funding for IDEIA 2004 and we still have no guidance from the SCDE…we’ve almost been a full cycle with no guidance this time. It is frustrating and I feel I can’t effectively implement what needs to happen for children in our district. We’re already at a disadvantage and now we have an additional disadvantage because we haven’t had guidance.

Another director shared her stance on making changes in her district’s policy and procedures and the importance of having guidance and finalized state policy and procedures from the state in a timely manner. Janna stated,
There are things from the state that we go above and beyond what we had to do on the federal level, and it seems like some of that is going to be changing...some of the things that we’ve been doing for years and years...I want to make sure that we are where we are as a state and we know what we are going to do to make a final copy before we make changes.

Justice replied to the question of whether or not she relied on the SCDE-OEC for assistance and she shrugged her shoulders and smiled. Then she linked relying on the SCDE for assistance to their timeliness in providing her with policy and procedures. Justice answered,

It depends. There are some things that you have to rely on them for. Instructions on how to complete something that’s required. You have to rely on them in some aspects, but even in those I find it very disconcerting that we don’t get directions up front and at the last minute I have to make corrections and put a lot of work into something that if we had been told upfront, it would have been done right to start with. In matters of policies and procedures I feel I have to rely on them, ‘cos I have to go along with what the state comes up with; however, there’s been such a delay in getting out info, we haven’t been able to rely on them so it’s been totally frustrating this go around.

CC commented on the delay of the SCDE-OEC producing regulations and guidance and compared the delay of South Carolina to the timeliness of other states. At the conclusion of her response, her fist was drawn tight as she pounded it into the palm of her other hand. She shared,

When IDEIA was reauthorized, so many states took the initiative in a leadership role to quickly provide their districts with a plan and our Department of Education doesn’t seem to do that. I don’t know if they’re understaffed, if they’re not given the means to do that kind of thing, but it’s frustrating that you look around at other states and they have things in place to help the LEAs and we just seem to kind of scramble. You know, everybody’s trying to figure out what to do with no real guidance. I think you will hear that from anybody you talk to.
Belated Regulations as referenced in all of these examples are of utmost importance when implementing new regulations. When drafting new policy and procedures is delayed at the state level, the ripple effect has multiple consequences for local districts. The ultimate consequence is that districts are lawfully expected to comply with the federal law, even under circumstances of Unclear Implementation Strategies. As Moe stated,

Oh yeah, whatever happened shouldn’t have taken four years. I can’t think of a valid reason of why it should’ve taken four years to take a document that we’re gonna copy 99% of it and take so long to get it out to us, but still hold us accountable for the new regs that came out four years ago. We’ve had no state meetings on it but yesterday-one day. One day for a 200 page document and we were told after yesterday’s meeting that it would probably change again.

It was evident that Belated Regulations were an issue that evoked emotion, interfered with LEA directors’ implementation of policy and procedures, and influenced directors’ decision-making.

Ambiguity

This is another pressure and barrier causing great frustration among directors. Ambiguity about how and what to implement has evoked concern among directors of special education. State policy and procedures are required for local directors to begin their decision-making at the local level. Ambiguity resonated in every interview conducted. The directors in this focus group were asked about their greatest concern regarding the IDEIA 2004 regulations. One of them responded and referenced both Belated Regulations and Ambiguity. Doc stated,

The state’s interpretation of the regs. I would like to see a complete copy of the regs and the state’s policies and procedures and the thing about page 128 on the
last copy I have, about the school day and counting those students who are out of
school for a partial day as expelled. Um…I just wondered where that kind of
thing is. A couple of things like that…interpretation from the state department
about the ability of the district to make decisions about this kind of thing.

CC shared these thoughts:

The most aggravation is not with the law this time; it is with the length of time it
has taken to get their [SCDE] policy to us. You know we still don’t have the regs
from them; of course they’re now redoing the first draft. They [SCDE] didn’t give
us regs. They gave us opinions, a philosophy. So that may be a problem with the
state’s regs, is the way they were written because I didn’t feel they were regularity
at all. I felt they were just the things I said.

At the conclusion of this director’s response, Mother M chimed in and after
concluding with her comments, she was visibly out of breath. In her rapid response,
without coming up for air, she shared,

One thing that concerns me is having to continue to operate, make decisions, and
not having answers and firm procedures. And we’ve gradually been working
towards that. And as we move through South Carolina procedures there are still
questions about how to do this and that and we get additional regs that go into
effect December 31st and we don’t have guidance to go with that, so I think in a
district this size, I’m not as, don’t have as much anxiety as larger districts might,
but I still have concerns about procedural kinds of things and where that may lead
you…legal issues!

This director also referenced the Ambiguity of what and how to implement with
concern over the lack of guidance by sharing, “A lack of guidance to follow the regs, I
think, is a problem. We’re always in limbo ‘cos we don’t know what they [SCDE] meant
or what they intended.” For directors of special education, not knowing what the SCDE-
OEC wanted or intended did raise their level of concern. Special education is driven by
court cases resulting in legislation, so the implications for directors’ poor decision-
making can be costly to districts.
As I interviewed these local directors of special education, *Ambiguity* was salient across all discussion. *Ambiguity* reared its head in the cadence of directors’ voices, their body language, their volume, and within the content of their responses. When asking Justice if there was a burning desire to share anything else, frustration echoed in the response.

Again...again, I think you just kind of...there is a lot of frustration of working with the people at our state level right now. And I do have to say there are some good people there that work very hard. They are not incompetent people, but whatever the problem is, it has become number one. With Susan leaving and the people there, the whole dynamics, the lack of leadership and lack of guidance and direction that has not been given to the local districts the last several years, especially in the light of Susan’s retirement, as to where our help is coming from and it is almost disheartening. In fact I was at a meeting, a policy and procedures meeting a couple of weeks ago. Someone in the audience shared that, on the topic of transition, she had researched and found things, forms, procedures, guidance on another state’s website on a topic that our state could give her no direction on. And you know it became obvious that if that state can have something already published on the web with specific procedures and format in which to accomplish it and our state could not give us the procedures to proceed...the disparity there was obvious to the entire audience and that is what we can’t understand. How did we get to this point and how is it going to get better? It is very frustrating that years ago the SCDE did provide us technical support and they would come out and do staff development and training programs for us and those days are so long since passed and it is a shame. It is more of a compliance issue. What do you need us to do now and not in an area where you would call someone up and ask for guidance or support.

**Constant Changes**

Additional *Pressures and Barriers* in the number of changes the SCDE-OEC has made in providing guidance, clarification, regulations, and directives have lead to *Unclear Implementation Strategies*. Directors consistently shared that they had been hesitant to make changes within their districts because what little direction they received from the SCDE was constantly being changed. Directors felt they had been given
directions that changed within a matter of weeks and that changed frequently. This
director shared her frustration over the constant changes and said, “Another thing is when
things change from month to month. An example would be the change with parents.
Giving parents the right to sign students out right now, when last week it wasn’t that
way.”

One local director, Colonel Mustard, shared an incident regarding the printing of
the district’s handbook to reflect the new federal regulations. Since the SCDE had not
provided final guidance and the state policy and procedures were still marked with a draft
watermark, the director relied on the guidance of the district’s attorney and proceeded to
write the district handbook based on this guidance since time was of the essence. This is
what Colonel Mustard shared,

…I went and took a handbook that one of the attorneys had prepared in the state,
our attorney, and just added what I wanted to. Well I sent it to be printed and at a
meeting for policy and procedures, they [SCDE] said if you haven’t printed your
handbook, don’t print it. Well, I’d been waiting for 6 months to print ‘cos it took
me that long to get it ready and now they were saying don’t print it…that kind of
thing is what is disturbing and creates a situation where you constantly have to be
on your toes and you don’t have any money. So it’s gonna be $1600.00 for me to
print my books and thank goodness they hadn’t done it.

A rant of her frustration of the Barrier and Pressure of Constant Changes rang
loud and clear as this director shared her concern of how the effects trickle down into the
classroom. Victoria’s concerns over the changes from day to day were substantiated with
the three quoted paragraphs that follow. Just as it was time to follow up with another
probing question, Victoria would take a deep breath and begin sharing another thought.

We went to a procedures meeting and went to lunch. When we got back,
something had changed from what they [SCDE] told us in the morning session.
Exactly what they had presented two and a half hours earlier had changed after
lunch when they [SCDE] said they got an email from OSEP. We’re in the middle
of the school year. New law was passed and we waited two years to get regs and we’re still waiting to find out what the state’s gonna do and it is time for it to be reauthorized. It concerns me that we’re waiting to receive a final copy of the regs and it is about to be reauthorized next year.

Sometimes I feel like it is to the point with our staff when we have to share things with them and continue to change. It is hard for teachers to feel confident when things change so rapidly and back and forth and it meant something this week and now it means something different this week. We are worried about their effectiveness.

When the SCDE gives you things, they should know what it means and what they mean for it to mean and what they want it to do. This is a reason for not making a quick change. We don’t have time to run around and redo when things change. The budget issues are compounded by redos when they could have been avoided.

These same sentiments were shared by another director who said she also had to make too many changes in her implementation strategies in midstream. According to Janna, making changes within her district every time the SCDE made another change impacted perceptions of the stakeholders in her district. She said,

Um…actually what I have learned to do is to wait before implementing, because you get ready to implement and it has changed and it is very difficult to get people…and I know why clerks want to string us up, because we will come back from one meeting and say it has changed and we have to do it this way. And a couple of months down the road, if it is that long, and say well, you know how we told you to do this? Well, it has to be done like this now. Especially with Excent changes and reg changes with federal and state levels, it has been hard changes.

But I’ve learned not to get too upset over it, because when I see draft I feel I need to see this unofficial and I have learned to wait. For example, we had signed up to go to the procedures and policy meeting in November, I think, and when I heard that there’s going to be another one on the first and fourth, we backed it up to go then. Our thinking was that when you have one meeting and you learn something and then it will change and change and change and they [SCDE] would make changes from the first to the last meeting and they would improve from the first time and we would get all the changes that happened. And sure enough, that information, while we were sitting there changed to draft because it was completely different than what was in the first print. But it is frustrating and it is especially frustrating when you are new or you haven’t been doing it that long and when you come back and tell your people something and you have to come back and tell them something else again, it looks like you’re not sure and you don’t
know what you’re doing. So, it is hard sometime for them to know that, look, I had no control over this…it changed.

In summary, the Constant Changes of guidance and regulations; the Ambiguity embedded in the guidance and regulations, and Belated Regulations painstakingly changed frequently, led to the Unclear Implementation Strategies that resulted.

Core Phenomenon

Unclear Implementation Strategies

The core phenomenon, Unclear Implementation Strategies, was identified as a result of the causes of the Pressures and Barriers: Belated Regulation, Ambiguity, and the Constant Changes, which were all generated within the SCDE-OEC and manifested in the LEAs. The core phenomenon impacted the choices directors began to make as their uncertainty of how and what to implement intensified.

Reactions and Responses

Another causal relationship was the creation of Reactions and Responses of directors, which was a result of Unclear Implementation Strategies and Pressures and Barriers. Reactions and Responses of directors was made up of the properties Accountability, Anxiety, Self-Interpretation, and Balance. Each of these properties was a product of the axial coding process.

Accountability

Many directors referenced concern over feeling a strong sense of Accountability associated with the content of the regulations and implementation of the regulations.
With the shift in focus from compliance to learner outcomes in the 2004 reauthorization, the pressure for directors’ implementation strategies to be effective became an issue of accountability. One director expressed her frustration of *Accountability* and *Belated Regulations* when she said, “…we’re being held accountable for a standard that we don’t even have yet.”

With shifted emphasis in the reauthorization of the new regulations from compliance to learner outcomes, what emerges from the data is that directors self impose a portion of their *Anxiety*. They hold themselves personally accountable for doing what is best for students. Directors have a strong sense of *Accountability* in addition to the mandated *Accountability* of learner outcomes, which is directly linked to effective implementation of the regulations. Although numerous directors expressed concern over *Accountability*, Doc stated that the *Accountability* measure was her greatest concern.

I like it and I see that it is needed and I support it, but just looking at that data on paper and knowing that I will held to the fire because of what it looks like on paper and whether or not our students are actually making those giant leaps in achievement and so forth when you’re dealing with kids who have true disabilities, learning abnormalities. And that is something that is naturally a concern because our progress in special education is slower. A small gain with a special education student may be monumental, but from an accountability measure, it looks like we haven’t accomplished anything. So, that probably would be the foremost concern I have. I do support the standards and feel like we do need accountability and they do need as much access to that general curriculum as possible.

LEA directors are accountable for learner outcomes which makes it vitally important that they effectively communicate desired results to building level administrators. Directors reported that *Accountability* was handled through a variety of ways to include face-to-face monthly administrative meetings, emails and memos, individual conferences, district web pages, visits to schools, and blogs. The majority of
administrators shared that they relied most heavily on the monthly administrative meetings and used the other methods as a way to reiterate information.

Directors also reported that they, themselves, monitor the accuracy of building level administrators through the data that is collected by the schools, district, and the SCDE-OEC and through simple observation of the number of problems arising in a particular school. The overall effectiveness of these administrators’ implementation is monitored through IEP meetings and the number involving due process, which is compliance driven, and student performance on assessments and progress toward annual IEP goals, which are documentation of learner outcomes. Directors felt that establishing a rapport and sustaining open communication with administrators had a profound impact on programming and services students received in the schools.

Anxiety

In addition to Accountability, Anxiety had an effect on the Survival Mechanisms, Networking and Isomorphism. Anxiety was the overarching emotion that resulted from imposed Pressures and Barriers and impacted the Reactions and Responses of LEA directors. Directors of Special Education became anxious when state policy and procedures were delayed; there was Ambiguity about when and how to implement the federal regulations; and, the state department Continuously Changed their directives to LEAs. Self-imposed expectations for overall special education program success resulted in additional Anxiety.

The salient terms used by directors throughout the interviews, frustration, stress, challenged, overwhelmed, and floundering, were indicative of the escalated levels of
Anxiety. One director spouted out her feelings and said, “I’m sure you’re aware that our state still hasn’t finalized the policy and procedures manual and so I think most directors would agree that we’ve been trying to “wing it” and trying to continue to follow what we’ve done in the past and try to implement things as we see that we can.” As she shared her thoughts her head bobbed back and forth in a “telling” manner.

Directors’ Anxiety surfaced in every interview. In addition to the rationale stated above, other stakeholders’ perceptions of special education contributed to directors’ Anxiety and their need to be perceived as legitimate. Moe felt special education was perceived as the “red-headed step child” by some educators. He felt the image of the position had improved over his tenure as legislation had enforced higher expectations; however, continued improvement was needed.

I want to say something that is relevant to this whole systemic issue. For a long time, directors of special education have been at the district office and that position was filled with someone who didn’t have a lot of experience or a background in special education, or it was filled with someone who was a year or two from retirement, so they’d put them in that role. Or they would move up some other administrator who had not been very effective at some other level and put them in the role of special education. And unfortunately, it wasn’t until litigation got involved that they saw how important this area was to the overall effectiveness of general education that people started to see the role as more of a professional role, a specialty role and it took on a different status and meaning, but some of that old way of thinking is still in place.

Self Interpretation

Self interpretation, also a result of Pressures and Barriers, surfaced as a default when the state neglected their responsibility to supply LEAs with state interpretation of the federal regulations in the form of state policy and procedures in a timely, clear, and determinate manner. Once the federal law, IDEIA, was passed, OSEP expected
compliance from the state and LEAs. The reauthorization of IDEIA was official in December of 2004. At that time, states were expected to comply with the federal law immediately, even while penning their state regulations. Side-by-side comparisons of the old and new law were drafted. This was the first attempt to provide guidance to states in penning their state regulations.

OSEP is responsible for interpreting the federal law and providing guidance to the states through the federal policy and procedures, commonly referred to as the regulations and by some local directors as the “regs”. Once the federal regulations were unveiled, states had the choice of mirroring them through adoption as their state regulations or making their state regulations even more stringent.

While states wait on the federal interpretation, they anticipate changes that are straightforward and typically give LEAs immediate guidance. Directors across the state, who were directors during the 1997 reauthorization and some prior to 1997, had experienced the state providing guidance and regulations in an efficient time frame in the past. Many directors shared their frustration over Self Interpretation because this was the first time they had to rely on their own interpretations.

One veteran director stated she was self interpreting because that is what everyone else was doing. Roxie stated,

Cos everybody’s interpreting it. It is a guessing game. Even if we present it as fact, what our firm understanding of this is, is still just an understanding. We’ve kind of just been floundering ‘cos we didn’t have the state policy and procedures for this last one, against which to fall, so we have had to interpret and that has been a nightmare.”
When asked what concerned this director the most about the new federal regulations, IDEIA 2004 Candy commented,

Interpretation. Having a clear understanding of what we’re supposed to do. And is that interpretation the same as everyone else’s? Is there a common understanding of what those regulations are? How is our district performing in comparison to other districts? Are we interpreting it the same way and implementing the same practices?

Balance

Interestingly, directors were straightforward in acknowledging the repercussions for noncompliance including a loss of funding, but an overwhelming number of directors were more interested in “doing what is best for students” and that if a Balance could not be reached, they were prepared for the consequences. Colonel Mustard bluntly spoke about past decisions and said, “When I’m trying to figure out my bottom line, it’s what about the kids. That is my bottom line and if I have to take a hit for what I think is best for kids, then I take it. And I’ve had to take a couple. That’s where I stand and that’s pretty much the philosophy of the coordinators in my district.”

Juniper comprehensively rationalized the need for balance when she said, “I think that we have to have a balance and I understand the need for compliance and accountability, but we need balance to focus on what’s good for kids.”

This strong desire for Balance between compliance and doing what is best for students causes some directors Anxiety. Captain shared the example of a transfer student and his desire to place transfer students in the appropriate environment upon initial enrollment. He stated that the regulation required him to provide immediate services to a transfer student, but it was his desire to receive paperwork and an IEP to ensure proper
placement. Captain knew this was noncompliant behavior, but he was willing to risk a reprimand for doing what he deemed most appropriate for the student.

**Competence**

The theme, *Competence*, included the two properties *Qualifications of the Director* and *Will of the Director*. *Competence* is a specific condition that influences *Reactions and Responses* of the director and *Survival Mechanisms* in which the director chooses to engage in their quest for success and *Legitimacy*.

**Qualifications of Director**

The *Qualifications of the Director* profoundly impact decision-making. Directors across the state have varied levels of education degrees, background of experiences, number of years in education and number of years in their current positions, and areas of certification. Inexperience impacted reactions and responses of directors. The average experience of directors in their current position was 6.3 years and 34 directors had 0-5 years experience. This directly influenced directors’ decisions to resort to and rely on *Networking*, which in turn fostered the spread of *Isomorphism*.

LEAs have complete autonomy, pending local board approval, to compile administrative job descriptions and the qualifications unique to these are diverse across districts. As defined in the questionnaire results, there is a local director with a total of four years experience in education and one with 40 years. Directors have degrees ranging from a BS +18 hours to the Ph.D. After obtaining job descriptions from interviewees and
reviewing them, it was determined that no two districts required the same qualifications or criteria to hold the position and title of Director of Special Services.

**Will of Director**

The *Will of the Director* was perhaps the backbone of influence affecting relationships and decision-making. This *Will* set the tone for communication, strategic planning, establishing rapport, sustaining relationships, and embracing changes that accompany new policy and procedures. The following statements all came from the same director who had a *Will* and an effervescent disposition worthy of emulating. Doc’s *Will* was an asset when implementing policy requiring changes in teachers and administrators’ practice.

I’m trying to empower our teachers and to call on some teachers who can be teacher leaders. I have really pushed professionalism. We’re striving for excellence. I want everything we do to be of quality and professionalism. I have a wonderful team of people right here with me. I brag about them all the time. I have a wonderful team with me and they contribute to any success in special education we share ‘cos I couldn’t do it without them. We’re all working together now. We try to get the information out there as user friendly as possible. I am bullheaded and I do feel like special education students have been short changed for years and I do feel like we can get better results. This (new regulations) has been a paradigm shift for them (teachers and administrators) and change is difficult and we continue to plug away and have to provide training along those lines, too, but we’re getting there. I keep saying that we’re going to be number one in the state!

**Survival Mechanisms**

This determination and *Will* of directors does influence their decision-making and their choice to engage in opportunities to network and increase the odds of stakeholders’ perceived *Legitimacy*. The *Survival Mechanisms* identified in the axial coding were
Networking and Isomorphism. Once directors began Networking, the temptation to succumb to Isomorphic Pressures became greater as prevailing opportunities were common practice.

Networking

The focus of the study was to isolate the factors influencing directors’ decision-making when implementing policy. The intent was to look at the patterns of directors’ decision-making within consortium groups as compared to directors who were not members of a consortium. The findings of this study reveal that all directors relied most heavily on Networking to inform their decision-making. As a result of the Pressures and Barriers and Unclear Implementation Strategies, directors who were not members of a formal consortium formed their own informal groups for the purpose of problem-solving and seeking guidance, as did the formal consortium groups. Directors who participated in monthly meetings with a Networking group considered their informal groups to be a consortium. These informal meeting groups were organized in the likeness of the formal groups and the format of their meetings was close to carbon copied. One director shared this information about how her informal consortium was formed.

When I came on board last year as the director, just forming friendships with the other county directors, and Curly [in one of those districts] was mentoring Candy in another county and that’s how she came on board with us and she knew another girl and we just kind of formed our own group and that’s been good ‘cos we needed a support staff. Curly has been a director for a while as have PJ, Larry, and Moe so they’ve been a really good support for those of us whom are a bit newer. We bounce ideas off each other ‘cos sometimes we get information from a source that others don’t so we pool our resources when we get together.
Directors resorted to Networking as a result of Pressures and Barriers and Unclear Implementation Strategies. Directors’ Reactions and Responses were also influenced by their Competence. The core phenomenon, Unclear Implementation Strategies, was the direct result of the state’s delay in producing policy and procedures, the Ambiguity of when and how to implement regulations, the infinite changes made by the SCDE-OEC, and the platform on which Networking was employed. All directors, with the exception of one, unanimously agreed that they turn to their colleagues in their formal and informal consortium groups for assistance in implementation decisions. The director who chose not to rely on her consortium group was new in her position and had just been introduced to consortium members in the capacity of a local director. She proposed that a rapport has not been established. The Competence of the director directly impacted her decision not seek information from her colleagues and members of the consortium to whom her district belonged.

Some consortiums held intentional meetings to debrief after their statewide SCDE-OEC meetings. Other directors reported problem-solving by phone. “[My consortium] has been wonderful. There have been a lot of people there in special education serving in this role for years. And I always have them on speed dial.”

Although the SCDE-OEC set up regional groups that were facilitated by an education associate from the SCDE-OEC and were more far reaching than one’s consortium, all directors who referenced these regional groups as a source of information or assistance stated that the groups were not effective. Several directors commented on their facilitator not attending after the first several meetings. The original intent of the SCDE-OEC was for the facilitator to disseminate and clarify information by having open
discussions answering questions from directors and consortia. Roxie shared, “We ask the SCDE and our regional rep, but our response from our regional rep has not been good. It’s just not adequate.”

Instead of relying on Ambiguity associated with the guidance from the SCDE, directors relied on their consortium groups to generate forms, interpret regulations, and troubleshoot issues and concerns as they surfaced. Directors’ lack of confidence in the SCDE increased the number of informal de novo groups, which in turn increased networking opportunities. Directors also reported contacting other districts and directors across the state, under certain circumstances, when needing assistance, but few relied on the SCDE-OEC and no one reported relying on their regional representative. Mother M shared,

We do talk with other districts…we meet and talk and that is good…we do a lot of putting our heads together and problem-solving. I rely on people out in the field who have good heads on their shoulders…and I rarely call the SCDE anymore ‘cos personally I haven’t had much luck with getting answers. I don’t know. It’s just a different feeling about that office than I’ve had in past years, so I don’t get anywhere with the SCDE to be honest with you.

This reaction of directors relying on other directors was a theme that resonated throughout many interviews. As a result of this reaction, directors relied more and more on their consortiums and the opportunity to network. Networking within formal and informal consortium groups meant directors worked in close proximity to one another, thus reinforcing redundant information exchanges across strong ties. These relationships enhanced mimetic behaviors of directors.

Networking proved to take place within formal and informal consortium groups and sporadically between individual directors across the state. One director in a focus
group stated that although the education associate from the SCDE-OEC no longer meets with their regional group, their group decided to continue meeting anyway. Moe shared,

Our regional group, we are pretty much talking to people all the way down to Columbia through it. A consortium within our group had those forms they pulled up and so the networking reaches across the state. Like I said, some of the people had had contact with people in Charleston so we were looking at their forms…taking them in from Columbia, Florence, and Berkeley.

The membership of the regional groups was formed from a broader geographic base and opportunities to network with those not in close proximity resulted in the exchange of new ideas.

Isomorphism

Networking also proved to foster the spread of institutional Isomorphism. Coercive Isomorphism was not prevalent in the findings of this study, other than the natural coercive pressure that accompanies laws. One director attributed the absence of coercive pressures to the shift in the focus of the federal regulations from compliance to learner outcomes. He believes that coercive pressures force compliance, but compliance is no longer the focus of the federal regulations governing special education. Larry stated,

One thing I was thinking is that implementing is the technical part is maybe a little easier than getting everybody to agree on the conceptual stuff. So trying to bring the general education folks and special education folks together for student outcomes, and if you look at some of the research based practices which are a support...And working with the general education folks and superintendents to conceptualize how education may look differently than how it’s looked in the past. It is difficult. We can almost force compliance. One of the easiest things to do is this ‘cos principals and assistant principals pretty much know that if they don’t follow this they’ll get in big trouble. So they’ll comply with that part, but
when you come to impacting instruction which affects learner outcomes, you’ve
got to conceptually come together in a way that has been very difficult.

There was evidence that directors were affected by *normative pressures*; however,
these seemed to be secondary. All directors reported being members of the Council for
Exceptional Children (CEC) and the Council for Administrators of Special Education
(CASE). Many directors subscribed to LRP publications and Wright’s Law and checked
the website of the National Association of State Directors of Special Education
(NASDSE) periodically. All directors received newsletters and journals through CEC and
CASE and attended their state and national conferences. Directors were members of other
education associations, received publications from these, and attended their conferences
as well.

Most *normative pressures* affecting directors seemed to be generated from outside
the SCDE. When asked how the SCDE affected her decision-making, Candy stated, “I do
ask [the SCDE] for assistance and when I ask, I feel like I get a response back, not that
same day, but I do get a response. Sometimes I’ll ask a question and if I don’t hear
something right away, I ask someone else. Then when the information comes back, you
sometimes get two different responses and you’re not sure which way to go.”

A probing question was used to ask a focus group about seeking informational
avenues outside their attorneys, consortium, and the OEC, and whether they relied on any
other organization or agency to which they belong. One director in the group, Mother M,
stated, “I read the NASESDE stuff that comes out and I read the CEC, but you know the
most helpful component of all of it is the transition component of CEC. I feel like at their
meetings I’ve gotten some pretty darn good information.” Her colleague, Caprice, who was also in the same focus group piped in.

For me, I rely on LRP, we subscribe to the Special Education Connection, and we look up things. I also look up things in Wright’s Law and subscribe to his newsletter ‘cos you know he’s always showing all the angles and the emotional piece that goes along with everything. Some of his conferences I feel he wants to win, but he says if the district is trying not to work with them [family], then to try and work with them ‘cos you’ve got lots of years together. And I always know that a lot of our parents are well informed. And LRP has been very helpful. I know I’ve emailed or contacted the editor when I couldn’t find something.

Although directors relied somewhat on membership in professional organizations, the SCDE and outside agencies, research, and literature to inform their decision-making, normative pressures seemed to be lying dormant at the time this study was conducted.

Roxie shared:

CASE [Council of Administrators of Special Education] has been really good as far as getting information and relying on them. Also LRP publications, Wright’s Law, those kind of things that actually have IDEIA and what the federal document requires and that will help us when we do get to the point where we feel like the state’s making some decisions and that way we can implement real closely.

The reason for the dormant status of normative pressures was the overbearing presence of mimicry. As a result of the Pressures and Barriers and the Reactions and Responses of directors, it was difficult to implement federal law under the circumstances of the core phenomenon, Unclear Implementation Strategies, and directors began feeling more intense pressure. Since other findings in this study indicated that all directors engaged in Networking, there was evidence in multiple interviews of directors being influenced by and succumbing to mimetic pressures. Justice shared:

I don’t feel hesitant to call somebody up. It is because the number of years I’ve been doing this. Yeah, there’s a good many people across the state that through
conferences and professional development and that kind of stuff. You know whether you know them well and you know that they’re facing the same thing on a daily basis that you are. I find that whoever is in this seat is always willing to share information, procedures, anything, ‘cos no-one has enough time to do what needs to be done and no one wants to reinvent the wheel. And they don’t want us to do it either, so I’m not hesitant to call around different places and ask for something.

One director, G, was asked what kinds of changes IDEIA had required her to make. Her response was, “I don’t know right now, ‘cos I’m just doing what everybody else tells me to do.” G went on to say that she relied on decisions from her consortium meetings and the day of the interview she had a scheduled meeting with a past director. She shared this, “She’s a former director and she’s worked a long time in special education and she’s already contracted with the district and I just continued the relationship.”

Another director was asked about the things she had implemented and how her ideas for implementing methods and procedures evolved. CC’s response was,

Well, I tell you who I really count on a lot is our consortium group. When this kind of change happens we all get together and pretty much discuss how we’re going to do it so we can do it similarly because our students move from one district to another in our area frequently. We basically sat down and tried to come up with similar policies and procedures to implement anything we deal with. Having them as colleagues has been helpful with us being prescriptive in how we handle things.

The interviewer asked a director a question, which ultimately led to this probe: “And those changes you made, did you make the changes based on your personal reading of these regs, or did you seek guidance from somewhere? The director responded, “Most of what I did this time was through my formal consortium and I borrowed some forms from Berkley County as I looked around to see how people were reacting.” One director
suggested finding a district with great forms and sharing them across the state. He insisted that all districts would have to do is secure a model form from another district and insert their own district’s logo into the letterhead at the top before using.

At another time, while interviewing a focus group, a question was followed by this probe: “If there was a change that required creating a new form or updating a new form, would your practice be to go back to your district and make those changes based on the knowledge you received from the SCDE firsthand, or would your practice be to move a little slower and consult others, whether others are agencies, organizations, or individuals, and why?” The response from one member of the group was,

Well, with our regional SCDE group and the formal consortium group within it that has been really great. They [the consortium members] are great at creating forms and with that if you ask for something or they create something, we’ll just use it. So for us, I am thinking why reinvent the wheel. They had really been on it. So for us, it is working with others that is best.

Perhaps this director found the greatest comfort in seeking Legitimacy by using the work of others she deemed more successful. Mother M stated, “I don’t think every time you should reinvent the wheel, and I think there are times when you can learn from someone else and take what they have and tweak it your own way. Not just jumping in and implementing based on me and my own philosophy.”

Yes, normative pressure was evident and had the potential to dictate directors’ behavior, but instead seemed to lay dormant. The Barriers and Pressures, Unclear Implementation Strategies, Reactions and Responses, and degree of Competence influenced directors to mimic those with whom they networked. The longer directors went without approved state regulations while being held accountable for implementing
the federal law, the more they networked. This opened opportunities for implementing the identical strategies other districts were implementing.

These *Survival Mechanisms, Networking* and *Isomorphism* were generated from *Unclear Implementation Strategies*, increased pressure for *Accountability, Balance, Self Interpretation*, and the increased *Anxiety* of directors. The directors’ *Qualifications* and *Will* had a direct effect on the *Reactions and Responses* of the directors and a causal effect on *Survival Mechanisms* as well.

**Outcomes**

*De facto State Policies and Procedures*

As a result of directors engaging in *Networking and Isomorphism*, the *Outcomes* were *De facto State Policies and Procedures*, and *Legitimacy*. LEA directors of special education have continually expressed concern over operating under *De Facto State Policies and Procedures*. At the time of data analysis, the current state regulations had not received formal approval and had a watermark stamped with the word DRAFT. Therefore the current state policy and procedures were not an official document, albeit a common practice of LEA directors had been established through *Networking* and *Isomorphism*. Ms. B expressed her concern over *De Facto State Regulations* in this manner, “I think that the thing that concerns me most is knowing that when they [federal regulations] were passed in “97, how long it took the state to help us. And knowing it is 2008 and the state is still not giving us the support we need. That’s my biggest concern. I mean really. Is our *state* not implementing these regs?”

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Legitimacy, another Outcome, is also a consequence of Networking and Isomorphism. Directors have a strong desire to be perceived as legitimate by their stakeholders. The following director shared the rationale for why all directors in this study networked and succumbed to isomorphic pressures. Colonel Mustard shared,

I tend to wait [to implement] because what I have found is that if you put a procedure in place, you interpret the state law or the federal law and see what you need to do and then you start doing it. Then you have to retract it and people in the community and schools begin not to think that you know what you’re talking about, or you lied, or you’re just doing what you want to do or whatever ‘cos that idea in special education is pervasive—that special education directors interpret or do what they want. And I think that’s a pervasive idea that we are getting away from and I think it’s improving on a regular basis. I think in my district we’re improving that perception, but we have to work very hard at public relations. If you tell somebody something and the next day you tell them something else, then they’re disturbed by that. And if I tell them that it is this way and tomorrow you tell them that it is this way…but I think the most bothersome thing is that you can’t get out of your head how to do what’s best for kids sometimes ‘cos you’re working on policy all the time and you’re scared to step right or step left ‘cos you might step in a hole somewhere or something. But we’ve implemented some things and we do have a vision.

Directors did not want to be in a position to retract directives or change implementation strategies once they had been given to administrators, teachers, and related stakeholders. Roxie stated:

It has been…we’ve been kinda real nervous about meeting eligibility criteria. We are using what has been our former guidelines and used any information the psychs [school psychologists] have had. They ask me for guidance and I ask others across the state. If they have guidance and something definite, then yes, but otherwise, we’ll just go with something we have. I can’t start something that I may have to retract later if I have to.

Likewise, Victoria shared this, “Sometimes I feel like it is to the point with our staff when we have to share things with them, and continue to change, it is hard for
teachers to feel confident when things change so rapidly and back and forth and it meant something this week and now it means something different this week. We are worried about their effectiveness.”

Operating under *De facto Regulations* raised directors’ level of concern. *De facto Regulations* were the result of a snowball effect initiated by the state’s lack of urgency to produce policy and procedures and clear implementation strategies to guide directors through the implementation process. Directors had a strong desire to know what to implement and how to implement IDEIA. To expedite the implementation process, while driven by their quest for legitimacy, directors succumbed to the mimetic pressures lurking in the context of their networks.

**Propositions**

The analysis of data, using systematic coding procedures, yielded concepts at the open coding stage; categories, properties, and a core phenomenon at the axial coding stage; and, through examining relationships and building propositions based on the interrelations between categories during selective coding, theory was developed. The conceptual relationships are found in the following propositions.

1. Directors of special education are reluctant to implement new policy and procedures without state board-approved regulations and clear implementation strategies.
2. Constant changes compounded the IDEA budgets in LEAs.
3. The timeliness of directors receiving state board-approved regulations directly affects the timeliness of directors’ implementation within their districts.

4. Directors having 0-5 years experience in their positions are more likely to seek legitimacy when faced with constant changes made to draft regulations.

5. When faced with ambiguity and unclear implementation strategies, directors’ strong desire to know exactly what to implement and how to implement fosters mimicry.

6. The desire of directors to do what is best for students sometimes contributes to self imposed anxiety.

7. Stakeholders’ perceptions of directors of special education and the field of special education contribute to directors’ anxiety as they seek legitimacy.

8. Establishing rapport, open communication, and sustaining relationships with administrators has a profound impact on programming and services for disabled students.

9. Directors forced to self interpret are more likely to network and mimic other directors decision-making.

10. The competency of the director can be a contributing asset when implementing policy and procedures requiring numerous changes in teachers’ and administrators’ practice.

11. Qualifications and will of the director influences their choice of whether to engage in opportunities to network.
12. Directors’ competence contributes to their own responses and reactions to pressures and barriers.

13. Directors’ lack of confidence increases the number of informal de novo groups and networking opportunities.

14. Clear implementation strategies contribute to effective implementation of policy and procedures.

15. Networking with directors contributes to the exchange of like ideas, thus reinforcing mimicry.

16. LEA directors of special education succumb to isomorphic pressures in times of uncertainty.

17. Uniform statewide policies and procedures would decrease the margin of error associated with self interpretation.

18. Networking is built on trust.

19. Clear implementation strategies are foundational to positively affecting learner outcomes.

20. Initial dissemination of correct information increases trust.

21. Directors’ need for survival mechanisms is reduced when ambiguity is not a factor.

22. Directors make implementation decisions quicker when states provide timely, clear, and finalized state policy and procedures.

23. The more rapidly local policy and procedures are implemented, the more rapidly learner outcomes can be positively affected.
24. Directors and administrators with more experience and expertise in special education are more confident in their special education implementation strategies.

25. Directors’ competency influences their decision-making and choice to resort to and rely on survival mechanisms.

**Summary**

This qualitative study isolates the factors that influence special education directions in the implementation of policy. Through the use ofStrauss and Corbin’s (1998) systematic coding procedures open categories were defined. Open coding was followed by axial coding whereby constant comparison of the content within the categories took place. The properties of the categories were defined through their relationships with other categories. Axial coding placed emphasis on causal relationships between categories. The core phenomenon was identified during axial coding. Selective coding followed and six themes emerged as the data was refined. These themes were *Pressures and Barriers, Unclear Implementation Strategies, Reactions and Responsibilities, Competence, Survival Mechanisms,* and *Outcomes.* The themes reinforced the relationships found between categories in the axial coding stage and categories were interrelated to ground the story in the data. The resulting propositions isolated the factors influencing directors’ decision-making when implementing policy and procedures.
CHAPTER FIVE

DISCUSSION

Institutional theory is grounded in the human need for legitimacy, or the quest to be perceived as effective. Faced with the challenge of implementing IDEIA 2004, South Carolina directors of special education confronted tough implementation decisions, which increased networking and pressured directors of special education to succumb to isomorphic pressures.

Directors of special education participating in this study were either members of a formal consortium or formed their own informal de novo consortium in search of directors with whom they could problem-solve. Networking was prevalent among these South Carolina directors of special education. Westphal, et al. (1997) proposed that such networking increases the spread of isomorphic pressures.

Institutional isomorphism illustrates how behavior is diffused by means of coercive, normative, and mimetic pressures and causes organizations to look alike; personnel responsible for interpreting and implementing new policy strive to gain legitimacy, and these pressures are the conduits by which legitimacy is achieved (DiMaggio & Powell, 1983, 1991). Personnel responsible for interpreting and implementing new special education policy, in LEAs, are the local directors of special education.
Summary of Major Findings

Directors of special education who participated in this study engaged in networking and succumbed to isomorphic pressures as a result of the pressures and barriers associated with what they perceived to be poor guidance from the SCDE-OEC. Although directors of special education were influenced by normative pressures, mimetic pressures had the greatest influence on these directors due to unclear implementation strategies.

The SCDE-OEC’s belated regulations, ambiguity, and constant changes led to unclear implementation strategies and specific reactions and responses of directors of special education. With increased anxiety, directors of special education found it necessary to self interpret the federal regulations that they were personally responsible for implementing in their districts, while balancing compliance with what they thought was best for students.

Directors’ competence affected their reactions and responses to the pressures, barriers, and unclear implementation strategies, and their decisions to resort to survival mechanisms in their quest for legitimacy. All directors of special education in this study relied on networking and were influenced by isomorphic pressures. This resulted in identical or like forms, procedures, and implementation strategies used in each of their districts. The overarching outcome was that the core, unclear implementation strategies, resulted in South Carolina LEA directors of special education operating under de facto state policy and procedures. However, in this time of uncertainty, directors of special education ensured legitimacy through networking and mimicry.
Answers to Research Questions

The theory developed from and grounded in the data of this study provides answers to the guiding questions.

1. When a policy is unveiled, when do directors of special education obtain information to inform decision-making?

Public Law 108-446, IDEIA, was enacted on December 3, 2004. Although states initially anticipated final regulations in December 2005, the actual release of the regulations occurred later. 34 CFR Parts 300 and 301 of IDEIA is titled “Assistance to the States for Education of Children with Disabilities and Preschool Grants for Children with Disabilities” and appeared in the Federal Register on August 14, 2006 as the Final Rule. These regulations became effective sixty days after posting in the Federal Register, which was October 13, 2006 (http://www.wrightslaw.com).

Federal regulations (20 USC Section 1417(e)) state that the United States Department of Education must provide all forms reflecting changes in the regulations published on the same date on which the final regulations are published. The OSEP did publish model forms and provide states with guidance on the contents within; therefore, both the federal regulations and model forms were made available on August 14, 2006.

Although the SCDE-OEC had not yet provided the State Board of Education with proposed state regulations by October 13, 2006, the new federal statute superseded the federal and state regulations from IDEA 1997 in all areas of change or discrepancy. The
definition of a “Highly Qualified Special Education Teacher” is an example of an area of Public Law 108-446 that became effective July 1, 2005.

The SCDE-OEC provided the South Carolina directors of special education with policy and procedures in the form of a draft document in the spring of 2008. When the present study went to press in the spring of 2009, the South Carolina State Policy and Procedures were still stamped with the watermark Draft. South Carolina’s State Policy and Procedures are currently published in the State Register with the following statement, “The Notice of Drafting was published in the May 25, 2007, State Register” (http://www.ed.sc.gov/agency/Standards-andLearning/Exceptional Children/old/ec/statereg/documents/FinalStRegisterStateRegulations.pdf).

This present study reveals that directors of special education were reluctant to implement new policy and procedures without state board approved regulations and clear implementation strategies. This finding has implications for considering not only when directors of special education obtain information to inform decision-making; moreover, the status of what information is received must be considered. Operating under draft state regulations that constantly change is a barrier to clear implementation strategies regardless of when directors of special education received the information.

2. When a policy is unveiled, how do directors of special education obtain information to inform decision-making?

Most states provide their LEAs with immediate guidance on certain issues within the federal law before states receive guidance from OSEP and before receiving state
policy and procedures. Typically, states inform LEAs of changes requiring immediate implementation and areas where LEAs will continue to operate under IDEA 1997 until further guidance is received. The SCDE-OEC provided directors with guidance through their first memo, often referred to as the March 11, 2005 memo. These are the opening paragraphs of the March 11 memo (Appendix K):

The Individuals with Disabilities Education Act (IDEA) was reauthorized and signed into law on December 3, 2004, as the Individuals with Disabilities Education Improvement Act (Public Law 108-446). We will continue to refer to this reauthorized Act as the IDEA ’04. Although the majority of the IDEA ’04 provisions are effective July 1, 2005, the only revisions in the current requirements for South Carolina school districts/agencies operating educational programs for students with disabilities that must be in place by July 1, 2005, are in those areas of the IDEA ’04 where the new requirements go beyond those in current State Board of Education (SBE) regulations. All individualized education programs (IEPs) previously developed that will be in effect on July 1, 2005, or developed from this date forward must include the new requirements. The provisions of the No Child Left Behind Act (NCLB) that were coordinated with the requirements of the IDEA ’04 were effective immediately.

The current SBE regulations are still in effect for all requirements that go beyond those included in the IDEA ’04. Since the federal regulations will clarify and interpret the IDEA ’04 requirements, changes are not planned for the SBE regulations until the federal regulations are promulgated by the United States Department of Education. The federal regulations are not anticipated until December 2005 at the earliest. The Office of Exceptional Children (OEC) will prepare revisions to the current SBE regulations for approval by the SBE at that time.

We will include all of the information disseminated on the new requirements of the IDEA ‘04 on a new section on the OECs Web Page, including any draft sample forms. This information is located on the State Department of Education’s Web site at http://www.myschools.com/ec/IDEA04.

The four-page memo was sent from Susan Durant, South Carolina State Director of the OEC. Superintendents, directors of programs for students with disabilities, state-operated programs, charter schools, head start directors and coordinators, advocacy groups, and due process hearing officers and mediators received the memo. The memo
also included the statement, “Please make all principals, assistant principals, guidance
counselors, and other appropriate staff working with students with disabilities aware of
this memorandum.” This memo was also copied to School District Attorneys. It is worth
noting that at the time this study was published the website referred to in the memo,
http://www.myschools.com/ec/IDEA04, was not in working order.

The four-page memo included specific guidance for IEPs, procedural safeguards,
and due process. The memo concluded with this summary:

School districts and state agencies must be in compliance with the areas outlined
in this memorandum by July 1, 2005. The submission of revised policies and procedures
is not required until both state and federal regulations are promulgated. There are
provisions in the IDEA ’04 that revise a number of requirements that the state will
continue to follow until the necessary changes are made to state and federal regulations.
One example is the requirement in the SBE regulations that the short-term objectives are
included in IEPs. Another example is the current discipline requirements. Please keep in
mind that until our SBE regulations in these areas are revised, our state will continue to
retain all current requirements. There are a number of other areas included in the
reauthorized IDEA that will require clarification and interpretations through the federal
regulations. There are also areas, such as specific learning disabilities, which will require
additional study by the SDE prior to the provision of guidance.

The SCDE-OEC provides training for directors of special education at an
administrators’ conference every fall and spring. Spring 2008 is when the SCDE-OEC
provided LEA directors of special education with the first draft of state policy and
procedures. At the following administrators’ training in the fall of 2008, directors left
disappointed that the SCDE-OEC did not provide them with final state regulations. The
OEC held meetings following the fall administrators’ training, which were held in late
November and early December 2008, where directors could choose among three dates on
which to attend. Directors of special education were once again disappointed when they
received the second draft of state regulations.
Participants in this study feel that the SCDE has provided little guidance to LEA directors of special education to assist them in interpretation and decision-making for their local policy and procedures. The SCDE-OEC’s communication has included webinars for instructions on data collection procedures, a memo on testing accommodations policies dated January 9, 2008, and the March 11 memo. As a result, directors of special education have relied on self interpretation of the federal regulations and solutions gleaned through networking and mimicry.

3. What do the directors of special education do with the knowledge once it is acquired?

Based on the findings of this study, the clarity of guidance and interpretation received from the SCDE-OEC determines what directors do with knowledge once it is acquired. When directors of special education are still operating under draft regulations, the ambiguity affects their decision-making. Historically, new federal regulations are first interpreted by the SCDE-OEC, and LEA directors of special education subsequently tweak their district policy and procedures to reflect the state regulations based on the guidance of the OEC. Directors of special education who were directors during the passage of IDEA in 1997 expressed the timeliness and unambiguous guidance provided by the SCDE-OEC at that time. Participants in this study reported feeling that the taxed capacity of the SCDE-OEC has contributed to the ambiguity, lack of responsiveness, and lack of guidance.
Once directors of special education receive guidance from the OEC, their local decision-making begins. Directors read the federal and state regulations and make decisions accordingly. Historically, some directors have discussed the regulations in-house and made decisions within their districts; some have made decisions based strictly on the state’s guidance; some have gleaned information from directors of special education across the state, publications, and organizations combined; and, some directors have made local decisions after consulting other directors of special education with whom they network regularly.

Once a director’s decisions have been made, local boards of education have two readings of the proposed policy and procedures before final approval is granted and the district begins operating under new policy and procedures. Directors reported the various ways in which they disseminate implementation strategies to administrators, teachers, and related personnel and ensure compliance with new policy and procedures.

This study reveals that ambiguity, belated regulations, and constant changes lead to unclear implementation strategies. Directors of special education voiced their frustration over these barriers and the effects of these barriers on complying with the law. Directors’ dissemination of information within their districts was delayed, constantly changed, and unclear. This led to uncertainty, which later led directors of special education to networking and ultimately succumb to isomorphic pressures.

The competency of the director of special education contributed to their own responses and reactions to pressures and barriers. A director’s qualifications and will also played an important role in their decision-making, the effectiveness of their communication, and confidence to guide the implementation of IDEIA in their districts.
An increased number of directors of special education with less experience and little confidence affected the popularity of networking within formal consortium groups and membership in de novo informal groups.

4. Do isomorphic pressures contribute to a shift in LEA special education directors’ acquisition of knowledge?

This findings of this study indicate that: (1) directors having 0-5 years experience in their positions are more likely to seek legitimacy when faced with constant changes made to draft regulations, (2) directors’ desire to do what is best for students contributes to increased conformity to isomorphic pressures, and (3) when directors of special education are forced to self interpret federal regulations, they are more likely to network and mimic other directors’ decision-making.

The belated state regulations led to delayed adoption and implementation of local policy and procedures. Westphal, et al. (1997) stated that early adopters are more apt to customize procedures and practices while striving for efficiency and late adopters are concerned with conformity. Therefore, those implementing delayed decision-making were driven by pressures to adopt legitimate practice, which made them more likely to mimic the normative model. Isomorphic pressures do contribute to a shift in special education directors’ acquisition of knowledge when faced with belated regulations, ambiguity, and constant changes. The findings of this study reveal that under the current conditions of operating with de facto state policy and procedures, directors of special
education have sought legitimacy through networking, which resulted in directors succumbing to mimetic pressures.

5. Does networking foster the spread of institutional pressures?

The findings of this study reveal that when directors of special education were faced with ambiguity and unclear implementation strategies, their strong desire to know exactly what to implement and how to implement fostered mimicry. Directors seek legitimacy, and when guidance from the SCDE-OEC was postponed, directors’ anxiety was increased. The greater the directors’ anxiety, the greater the possibility the director conformed by means of mimicking other directors who were perceived as legitimate.

The directors of special education who participated in this study engaged in networking across close personal ties that not only reinforced an exchange of redundant and similar information but also increased the likelihood of mimetic behavior. DiMaggio and Powell (1983) declared that institutional isomorphism places emphasis on seeking legitimacy, which can result in mimetic behavior and organizations with similar status tend to imitate each other; hence, institutional isomorphism.

Marion (2002) stated, “An organization must be perceived as credible and ‘mainstream’ to achieve support from its public” (p. 282). Directors of special education revealed in this study that it was important that their stakeholders perceive them as legitimate. Directors had a strong desire to be trusted by those to whom they are accountable regardless of the hierarchy of the position. Barriers and pressures facing
directors of special education made it difficult for directors to feel they were perceived as legitimate; therefore, directors succumbed to isomorphic pressures.

Networking was the conduit by which legitimacy was obtained. Directors participating in consortium groups reflected on their decision-making and admitted the focus of their groups was to problem-solve and rely on collective decision-making orchestrated by the group. Directors of special education, who were not members of formal consortiums, formed de novo, informal groups to provide them with the same networking opportunities as the formal groups. Networking was the way directors obtained answers about what to implement and how to implement.

6. Which of DiMaggio and Powell’s (1983) three isomorphic pressures has the greatest influence on administrators’ implementation of IDEIA?

(a) Mimetic Pressure
(b) Normative Pressure
(c) Coercive Pressure

Although coercive pressures accompany new laws, coercive pressure was not what reinforced special education directors’ decision-making. Normative pressures are abundant and many organizations, individuals, and publishers thrive on influencing directors’ decision-making. The findings of this study reveal that local directors of special education resorted to consulting organizations of which they were members, reading newsletters and publications, and frequenting websites, but they had not acted on information gleaned from these organizations. Instead directors seemed to have been
engaged in gathering information from these sources on which to possibly consider in future decision-making, or to share at consortium meetings to assist in problem-solving. Normative pressures appeared to be dormant during this study; mimicry prevailed as the prevalent basis for directors’ decision-making in uncertain times.

What directors of special education relied on most heavily was the decision-making of colleagues whom they trusted and who were faced with the same accountability and compliance demands. Directors stated that they felt there was a sense of safety in all directors making like decisions in light of the unclear implementation strategies and de facto state regulations. As a result, individuals within formal and informal consortium groups, as well as the groups themselves, resorted to mimicking those perceived as most effective in their quest for legitimacy. Networking fostered the spread of isomorphic pressures and regarding the implementation of IDEIA, networking fostered mimetic isomorphism with the exchange of like ideas across close ties.

**Implications**

The outcome of this study is the product of evident barriers and pressures that were observable upon special education directors’ receipt of the SCDE-OEC’s response to the reauthorization of IDEA on December 3, 2004. At the time of the publication of this study, the state of South Carolina was still operating under de facto state policy and procedures. In spite of this constraint, LEA directors of special education felt they had achieved legitimacy through mimicking the behaviors of their peers as they perceived safety in numbers with many directors doing the same thing and acting in concert with one another.
This study provides the SCDE-OEC with information to inform their decision-making and practice when faced with future reauthorization of federal laws. Although local directors of special education who participated in this study were completely frustrated with the barriers and pressures that unclear implementation strategies posed, some were empathetic towards personnel at the SCDE-OEC and realized their limited capacity and manpower.

One way to increase the clarity of guidance given by the OEC and LEAs is for departments within the SCDE to communicate with one another and with all stakeholders at the local level. As Van Meter and Van Horn (1975) stated,

Effective implementation requires that a program’s standards and objectives be understood by those individuals responsible for their achievement. Hence, it is vital that we concern ourselves with the clarity of standards and objectives, the accuracy of the communication to implementers, and the consistency (or uniformity) with which they are communicated by various sources of information. Standards and objectives cannot be carried out unless they are stated with sufficient clarity so that implementers can know what is expected of them.

IDEIA 2004 is grounded in the concept that all students are general education students and special services provided through IDEIA are a support to help students access the general curriculum as warranted. Response to Intervention (RTI) is mentioned in NCLB and IDEIA; however, this is a general education initiative that aims to provide interventions within general education to prevent the need for future special education services for students at risk. RTI may also be the process by which students are identified as having a specific learning disability. Implementation of RTI requires that special education and regular education collaborate to ensure effective services for all students.
and this requires communication within the SCDE, local districts, and individual schools. Decisions made at the SCDE must be communicated to all stakeholders across all divisions and not just to those working within a particular division. For general education and special education to work together for the good of all students, thorough and effective communication must be seamless.

Anticipation of the reauthorization of federal laws governing special education programs must be a priority for the SCDE-OEC well in advance of receiving federal regulations. Upon receipt of federal law and before the release of the federal regulations, the SCDE-OEC must position and equip the department with the internal capacity to begin decision-making immediately. As soon as the federal law is passed, a working draft should be penned by the SCDE-OEC as the state awaits final federal regulations from OSEP. Then, states may make the decision to mirror the federal regulations or identify areas in which the state prefers to maintain more stringent policy and procedures. This would require the state to make only minor adjustments to their initial draft of the state regulations and would ensure a timely release of state policy and procedures and guidance as well as operation under finalized state policy and procedures. The South Carolina State Director of the OEC has the capacity to network across the United States to glean information from other state directors who are also members of NASEDE. South Carolina produced state regulations as late as two years after other states.

As supported by the statements in interviews of local directors of special education, raising the salaries of employees at the SCDE would attract people outside of the greater Columbia, South Carolina area, thus making the applicant pool larger and more diverse, and therefore enabling the SCDE to consider more rigorous criteria and
qualifications for applicants. Attracting some of the brightest special educators in the state would increase the capacity of the OEC and provide timelier decision-making while alleviating unambiguous guidance and operation under de facto state policy and procedures.

Legitimacy

Several directors of special education stated in their interviews that uniform local policy and procedures across all districts in South Carolina as produced by the SCDE-OEC would ensure compliance and positively affect standardization of practices within local districts. If the state provided all districts with the same policy and procedures, there would be less local interpretation and less opportunity for error in interpretations and implementation. For example, it would be easier on districts, parents, and students when students transfer across district lines or relocate to another part of the state if all districts operated under the same procedures and used the same forms. Uniform policy and procedures would alleviate special education directors’ anxiety and help alleviate the surmountable pressure to imitate other directors’ implementation strategies when faced with ambiguity and unclear guidance from the state.

Although engaging in networking and succumbing to isomorphic pressures resulted in directors of special education being perceived as legitimate, building capacity by increasing the rigor of training programs for directors of special education and the requirements and qualifications necessary to become a director of special education, and having state-wide uniform standards to hold the position would decrease directors’ need to mimic other directors. The competency of the director of special education directly
affects the director’s decision-making and the intensity of the director’s desire to be perceived as legitimate.

The findings of this study inform directors of special education of ways in which their consortium groups influence their decision-making and how, when faced with little guidance from the SCDE-OEC, they approach decision-making differently. This is an opportunity for directors to self reflect and make changes accordingly. The more knowledge directors have about the content of the federal and state regulations, the better equipped they are to make sound decisions based on many sources of information instead of caving into the pressures of mimicry. Consortiums should review their mission and while seeking to maintain their status as a problem-solving body, be cognizant of their behaviors surrounding decision-making. Legitimacy can be achieved through various means without succumbing to mimicry.

Recommendations for Further Research

This study was conducted in the state of South Carolina among directors of special education who were members of both formal and informal networking groups. Replicating this study in a state where state-wide uniform policy and procedures are in place and where the directors of special education are operating under finalized, state board approved state policy and procedures, would yield additional information on the role networking and isomorphic pressures play in directors’ decision-making. Information may also be gleaned as to which of the three isomorphic pressures, if any, shape directors’ decision-making when not faced with ambiguity.
Replicating this study in a state that has uniform state-wide criteria for the position of director of special services would yield additional information on the extent to which a director’s qualifications affect their decision-making, reliance on networking, and ability to resist succumbing to isomorphic pressures.

A study needs to be conducted in a state in which home rule is not prevalent and the state superintendent is not elected.

This study will also inform other divisions than special education, and various levels within school districts. Policy implementation takes place in every division within a LEA and at both individual schools and within the central office. Once there are barriers at the federal level, they trickle down to the state level, then to the district level, and ultimately there are implications for the building-level administrator and for teachers, as well. Identifying specific quality training programs, preparatory programs, and ongoing staff development may be necessary to better equip personnel responsible for interpreting policy and responding to it.

**Summary**

This qualitative study isolates the factors that influence the decision-making of directors of special education when faced with the implementation of new policy. Implementation studies tend to ask, “Why did it happen this way?” while grounded theory is based in a search for meanings. The findings of this study answer the question of “why it happened this way”. The study reveals that the outcomes, de facto state policy and procedures and legitimacy, happened as the result of pressures and barriers imposed on directors of special education by the SCDE-OEC, unclear implementation strategies,
the competence, reactions and responses of the directors of special education, networking, and the isomorphic pressures that dictated directors’ behavior. The propositions were built on explanatory relationships and give meaning to the emergent theory grounded in the data of this study and practical to everyday decision-making among directors of special education.

This study adds to the knowledge of institutional theory by closely examining the human need for legitimacy. The findings of this study implicate that coercive pressures, inherit with laws themselves, force mimicry. Traditional institutional theory creates isomorphism, but in this study the findings indicate that coercive pressure does not tell directors of special education what to do and how to do. Therefore, it is the belief of the researcher that coercive pressure drives isomorphism.

With the passage of IDEIA 2004, coercive pressure was commensurate with federal law. This coercive pressure, along with the barriers and unclear implementation strategies, pressured directors into finding a way to comply with the new law and the coercive pressures accompanying the law. Directors resorted to networking. Networking provided a way for directors to share information and problem solve. Ultimately, networking provided directors an opportunity to exchange like ideas across close ties. This yielded a sense of security as directors of special education felt there was safety in numbers if all of them chose to do the same things. The obvious result of networking was mimicry. Directors implemented identical forms, procedures, and strategies.

This study isolates the factors influencing directors of special education when implementing policy and shows that when directors encounter the challenges of pressures and barriers generated in the SCDE-OEC and those documented in this study, they rely
on networking and isomorphic pressures to dictate their behavior. The longer it takes to make implementation decisions, the more apt directors of special education are to mimic the behavior of others in their quest to be perceived as legitimate by their stakeholders. This study shows that when new federal law is accompanied by ambiguous guidance from the SCDE-OEC, effective and efficient services for disabled students are delayed and directors of special education rely on networking and the pressures of isomorphism to inform their decision-making.
APPENDICES
Appendix A

Administrators’ Brief Vitas

Susan Dorsey Durant:

Susan Durant has forty years of experience in education. Twenty-eight years have been in special education administration. She was the Director of the Office of Exceptional Children, South Carolina Department of Education from July 2000 to December 2008. Prior to this time, Mrs. Durant was the Executive Director of Special Education in Richland County School District. In addition to serving as both the state and a local director, Mrs. Durant serves on numerous and has served on the National Association of State Directors of Special Education (NASDSE) Board of Directors.

Dr. Susan Smith Rex:

Dr. Sue Rex is the wife of the current South Carolina State Superintendent of Education. She has a background in both elementary education and special education. Dr. Rex is a retired Winthrop University special education professor and currently serves on the university’s Board of Trustees. Dr. Rex is the author of more than a dozen books and is an advocate for public education. She has been awarded the South Carolina Counseling Association’s Humanitarian award, President Bush’s Point of light award, and Jefferson Pilot’s annual award for public service.
Betty Jo Hall:

Betty Jo Hall is currently the Assistant Superintendent for a local school district in South Carolina. Mrs. Hall has been an administrator since 1996 having served as an assistant principal, director of human resources, and assistant superintendent. She has been awarded numerous grants, served on state boards, and was awarded the Data Works Instructional Leadership Award. Mrs. Hall has supervised the director of special education in her district since 2003.
Appendix B

Cover Letter

Dear Colleagues:

Hi, my name is Julie Fowler. I am conducting a study under the direction of Dr. Jack Flanigan at Clemson University. My study is *An Investigation of the Factors Influencing Directors of Special Education in the Implementation of Policy.*

You have been identified as a Local Education Agency Director of Special Education in the state of South Carolina. As a Director of Special Education in this state, I am interested in the factors influencing your decision-making for implementation of new federal, state, and local policy.

Your identity and information will remain anonymous should you volunteer to participate in this study. Your one-time participation in this study will involve the completion of the enclosed questionnaire. If you chose to participate in this study, by completing and submitting the questionnaire, you are giving your consent to the use of your responses for the study.

If you have any questions regarding this study please contact me via e-mail at jfowler@clemson.edu or you may contact the Clemson University Office of Research Compliance at 864-656-6460 with questions regarding your rights as research participants.

Thank you in advance,

Julie Fowler
Appendix C

Questionnaire

Years experience in education_________
Size of district_________
Years in current position___________
Highest degree earned______________
Member of a consortium ____Yes ____No

Please answer the following questions by circling one answer per question using the following scale: strongly agree (SA), agree (A), disagree (D), or strongly disagree (SD).

1. When a new policy is unveiled, I am quick to implement changes in my district.
   SA
   A
   D
   SD

2. When a new policy is unveiled, I consult other colleagues before identifying necessary changes needed for implementation in my district.
   SA
   A
   D
   SD
3. I am notified of new policy information directly by the state before hearing about it from colleagues.

SA
A
D
SD

4. Upon the receipt of new policy, I prefer discussing options for required changes with colleagues instead of working on my own.

SA
A
D
SD

5. I often seek information from other school districts to inform my decision-making.

SA
A
D
SD

6. I seek information from sources outside the public school system to assist me in my decision-making.

SA
A
7. I have sole responsibility for policy implementation of IDEIA 2004.

SA
A
D
SD

8. The practices of other school districts inform my decision-making.

SA
A
D
SD

9. I disseminate information quickly to building-level administrators.

SA
A
D
SD

10. I present information directly to building-level administrators.

SA
A
D
SD
11. IDEIA 2004 has required me to make many changes in my local policy and practice.

12. I rely on the assistance of the State Office of Exceptional Children to assist in my decision-making before implementing new policy.

13. I rely on curriculum consultants to inform my decision-making about materials needed to comply with new mandates.

14. I am a member of one or more professional organizations and I rely on the information gleaned from these organizations in my decision-making.
15. I read new policies, regulations, and requirements necessary for local implementation.

16. I make decisions for my district based on my own knowledge and interpretation.

17. Upon receipt of new federal and/or state policy, I go along with it and begin implementation.

18. I often seek implementation information from school districts with which I have a close association.
19. I get sufficient assistance from the State Office of Exceptional Children and require no other assistance to implement new policy.
Appendix D

Cover Letter for Validation

Dear ___________________,

Thank you for agreeing to assist me with my study: An Investigation of the Factors Influencing Directors of Special Education in the Implementation of Policy by evaluating the questionnaire I plan to use to assess the practice of special education directors in South Carolina.

You have been identified as someone in the state of South Carolina having knowledge of and experience in special education. As a past Director of Special Education in this state, I am interested in the factors influencing directors’ decision-making for implementation of new federal, state, and local policy. Your review of this questionnaire will assist me in establishing the content validity of this instrument.

In an effort to fulfill the purpose of this study, the following guiding questions will be investigated:

1. When a policy is unveiled, when do directors of special education obtain information to inform decision-making?

2. When a policy is unveiled, how do directors of special education obtain information to inform decision-making?
3. What do directors of special education do with the knowledge once it is acquired?

4. Do isomorphic pressures contribute to a shift in LEA special education directors’ acquisition of knowledge?

5. Does networking foster the spread of institutional pressures?

6. Which of DiMaggio and Powell’s (1983) three isomorphic pressures has the greatest influence on administrators’ implementation of IDEIA?

Thank you for assisting with my doctoral research. The questionnaire and directions for determining content validity are attached.

Julie
Appendix E

Validation Directions

Please indicate whether each individual item on the questionnaire supports the guiding questions by answering met, partially met, not met, or not applicable for each.

Please rate the overall research instrument by responding with met, partially met, not met, or not applicable to the following statements regarding the questionnaire:

1. understandable instructions;
2. neat and user-friendly format;
3. concise, yet comprehensive structure; and,
4. a clear method of response.
Focus Group Letter

Information Concerning Participation in a Research Study

Clemson University

(AN INVESTIGATION OF THE FACTORS INFLUENCING DIRECTORS OF SPECIAL EDUCATION IN THE IMPLEMENTATION OF POLICY)

Description of the research and your participation

You are invited to participate in a research study conducted by Dr. Jack Flanigan, along with Julie Fowler. The purpose of this research is to investigate the factors that influence special education directors in the implementation of policy.

Your participation will involve being a member of a focus group and taking part in an interview about your responses to the reauthorization of IDEA in 2004, and your decision-making regarding implementation of federal, state, and local policy.

The amount of time required for your participation will be approximately one hour for the initial interview and the possibility of one or more follow up interviews.

Risks and discomforts

There are no known risks associated with this research. Participants will remain anonymous throughout data collection and reporting.
Potential benefits

There are no known benefits to you that would result from your participation in this research; however, this research may reveal practical implications benefiting you and other local education agency directors.

Protection of confidentiality

We will do everything we can to protect your privacy. Your identity will not be revealed in this study or any publication that might result from this study.

Voluntary participation

Your participation in this research study is voluntary. You may choose not to participate and you may withdraw your consent to participate at any time. You will not be penalized in any way should you decide not to participate or to withdraw from this study.

Contact information

If you have any questions or concerns about this study or if any problems arise, please contact Dr. Jack Flanigan at Clemson University at 864-656-5091. If you have any questions or concerns about your rights as a research participant, please contact the Clemson University Office of Research Compliance at 864-656-6460.
Appendix G

Individual Interview Letter

Information Concerning Participation in a Research Study

Clemson University


Description of the research and your participation

You are invited to participate in a research study conducted by Dr. Jack Flanigan, along with Julie Fowler. The purpose of this research is to investigate the factors that influence special education directors in the implementation of policy.

Your participation will involve participating in an individual interview about your response to the reauthorization of IDEA in 2004, and your decision-making regarding implementation of federal, state, and local policy.

The amount of time required for your participation will be approximately one hour for the initial interview and the possibility of one or more follow up interviews.

Risks and discomforts

There are no known risks associated with this research. Participants will remain anonymous throughout data collection and reporting.
Potential benefits

There are no known benefits to you that would result from your participation in this research; however, this research may reveal practical implications benefiting you and other local education agency directors.

Protection of confidentiality

We will do everything we can to protect your privacy. Your identity will not be revealed in this study or any publication that might result from this study.

Voluntary participation

Your participation in this research study is voluntary. You may choose not to participate and you may withdraw your consent to participate at any time. You will not be penalized in any way should you decide not to participate or to withdraw from this study.

Contact information

If you have any questions or concerns about this study or if any problems arise, please contact Dr. Jack Flanigan at Clemson University at 864-656-5091. If you have any questions or concerns about your rights as a research participant, please contact the Clemson University Office of Research Compliance at 864-656-6460.
Appendix H

Interview Script

Hi, my name is Julie Fowler. I am conducting a study under the direction of Dr. Jack Flanigan at Clemson University. My study is An Investigation of the Factors Influencing Directors of Special Education in the Implementation of Policy.

You have been identified as a Local Education Agency Director of Special Education in the state of South Carolina. I am interested in the factors influencing your decision-making for implementation of new federal, state, and local policy.

We will not use your name in the report; however, to identify your responses you may select a pseudonym.

We will give you the opportunity to review the transcripts prior to using them in the construction of our report.

There will be no payment for participation in this study. There will be an initial interview and the possibility of a follow up interview should clarification or the need to expound arises. Hopefully, a phone for clarification will be all that is warranted.

What pseudonym would you like to use?
Appendix I

Interview Questions

1. When you think about IDEIA, what concerns you most?

2. What changes do you think IDEIA requires you to make?

3. What types of implementation decisions have you made due to IDEIA?
   
   How did your implementation ideas evolve?

   What made you implement in that manner?

   Could you describe the events that led up to this implementation?

4. Who has been the most helpful to you in implementing these changes?

   How did this person assist you?

   Has any organization or agency assisted you?

   What did this organization, agency, or person help you with?

   How has their assistance been helpful?

5. Before implementation, what types of discussions did you have with others?

   Who?

   Where they are geographically located?

   Describe your relationship with this person.

6. How do you communicate desired results with regard to IDEIA-required changes?

   Describe a time when your implementation strategies changed and why?

7. How do you hold principals responsible for implementing IDEIA?

   What similarities do you see between principals’ responsibility for
implementing IDEIA and their responsibility for their school’s performance on the school report card?

8. How do you disseminate information about new policy with regards to IDEIA?
Describe your audience?

How often do you follow up after initial information is shared?

How do you measure or evaluate effectiveness of implementation?

How do you measure or evaluate the accurateness of IDEIA implementation?
Appendix J

Questionnaire Results

1. When a new policy is unveiled, I am quick to implement changes in my district.

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<td>One no answer</td>
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<tr>
<td>A</td>
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<td>D</td>
<td>18</td>
<td>I’ve learned to wait because often changes are made</td>
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2. When a new policy is unveiled, I consult other colleagues before identifying necessary changes needed for implementation in my district.

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<td>D</td>
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</tr>
<tr>
<td>SD</td>
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3. I am notified of new policy information directly by the state before hearing about it from colleagues.

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<tr>
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<td>A</td>
<td>15</td>
<td>Sometimes</td>
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<tr>
<td>D</td>
<td>29</td>
<td>Special connection first</td>
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State Department very slow to disseminate information
4. Upon the receipt of new policy, I prefer discussing options for required changes with colleagues instead of working on my own.

SA 32  
A 22  
D 5  
SD 0

5. I often seek information from other school districts to inform my decision-making.

SA 30  
A 23  
D 6  
SD 0

6. I seek information from sources outside the public school system to assist me in my decision-making.

SA 9 legal  
A 21  
D 24  
SD 5
7. I have sole responsible for policy implementation of IDEIA 2004.

SA 20
A 18
D 12
SD 5

2 no answer and 1 circled both Agree and Disagree together

8. The practices of other school districts inform my decision-making.

SA 11
A 40
D 8
SD 0

9. I disseminate information quickly to building-level administrators.

SA 28
A 25 After I am sure of changes and have consulted with others.
D 5
SD 0

1 no answer

10. I present information directly to building-level administrators.

SA 22
11. IDEIA 2004 has required me to make many changes in my local policy and practice.

12. I rely on the assistance of the State Office of Exceptional Children to assist in my decision-making before implementing new policy.

I answered both Agree and Disagree with comment “depends”
13. I rely on curriculum consultants to inform my decision-making about materials needed to comply with new mandates.

SA  5
A 25
D 24
SD  5

14. I am a member of one or more professional organizations and I rely on the information gleaned from these organizations in my decision-making.

SA 11
A 35
D 12
SD  0
1 no answer

15. I read new policies, regulations, and requirements necessary for local implementation.

SA  43
A  15
D  1
SD  0
16. I make decisions for my district based on my own knowledge and interpretation.

SA 11
A 29 “but also consult with others”
D 16
SD 3

17. Upon receipt of new federal and/or state policy, I go along with it and begin implementation.

SA 5
A 31
D 21 “I get clarification again and again”
SD 0
1 no answer

18. I often seek implementation information from school districts with which I have a close association.

SA 30
A 22
D 5
SD 2

19. I get sufficient assistance from the State Office of Exceptional Children and require no other assistance to implement new policy.
D  24  “There is always more that needs to be done. The state is short
staffed. Salaries need to be increased at the state level in order to
recruit and retain staff.”

SD  21  Had an exclamation point and underlined SD
Appendix K
Memo Regarding Reauthorization of the Individuals with Disabilities Education Act

MEMORANDUM

TO:
District Superintendents
Directors of Programs for Students with Disabilities
State-Operated Programs
Charter Schools
Head Start Directors and Coordinators
Advocacy Groups
Due Process Hearing Officers and Mediators

Please make all principals, assistant principals, guidance counselors, and other appropriate staff working with students with disabilities aware of this memorandum.

FROM:
Susan D. DuRant, Director
Office of Exceptional Children

DATE:
March 11, 2005

RE:
Reauthorization of the Individuals with Disabilities Education Act

The Individuals with Disabilities Education Act (IDEA) was reauthorized and signed into law on December 3, 2004, as the Individuals with Disabilities Education Improvement Act (Public Law 108-446). We will continue to refer to this reauthorized Act as the IDEA '04. Although the majority of the IDEA '04 provisions are effective July 1, 2005, the only revisions in the current requirements for South Carolina school districts/agencies operating educational programs for students with disabilities that must be in place by July 1, 2005, are in those areas of the IDEA '04 where the new requirements go beyond those in current State Board of Education (SBE) regulations. All Individualized education programs (IEPs) previously developed that will be in effect on July 1, 2005, or developed from this date forward must include the new requirements. The provisions of the No Child Left Behind Act (NCLB) that were coordinated with the requirements of the IDEA '04 were effective immediately.

The current SBE regulations are still in effect for all requirements that go beyond those included in the IDEA '04. Since the federal regulations will clarify and interpret the IDEA '04 requirements, changes are not planned for the SBE regulations until the federal regulations are promulgated by the United States Department of Education. The federal regulations are not anticipated until December 2005 at the earliest. The Office of Exceptional Children (OEC) will prepare revisions to the current SBE regulations for approval by the SBE at that time.

We will include all of the information disseminated on the new requirements of the IDEA '04 on a new section on the OEC's Web page, including any draft sample forms. This information is located on the State Department of Education's Web site at http://www.mysschools.com/ec/IDEA04.
The following is a brief description of the areas where it is our understanding that new rights and/or requirements are effective on July 1, 2005.

CHILDREN ENROLLED IN PRIVATE SCHOOLS BY THEIR PARENTS

- School districts must consult with private school officials throughout the school year. If a school district disagrees with the views of private school officials on the provision of services or the types of services, whether provided directly or through a contract, the school district must provide the private school officials a written explanation of the reasons why the school district chose not to provide services directly or through a contract.

- School districts must obtain written affirmations signed by representatives of private schools verifying timely and meaningful consultation with the private schools' representatives. If a private school does not provide the affirmation within a reasonable period of time, the school district must forward documentation of the consultation to the SDE.

- Private school officials have the right to submit complaints to the SDE that school districts did not engage in consultation that was meaningful and timely, or did not give due consideration to the views of private school officials. The SDE then obtains a response from the school district and makes a final decision as to the complaint. A private school official who is dissatisfied with the SDE's decision may file a complaint with the United States Department of Education.

PROHIBITION OF MANDATORY MEDICATION

School district/agency personnel may not require a student to obtain a prescription for a substance covered by the Controlled Substances Act (21 U.S.C. § 801 et seq.) as a condition of attending school or receiving an evaluation to determine eligibility for special education services.

EVALUATIONS AND REEVALUATIONS

- Either a parent of a child, the SDE, other state agency, or school district may initiate a request for an initial evaluation to determine if the child is a child with a disability.

- While school districts/agencies may utilize mediation or due process to override a parent's refusal to consent to an evaluation or reevaluation, if a parent refuses to consent to an initial placement and provision of special education and related services, the school district/agency may not utilize mediation or a due process hearing to override a parent's refusal to initially place the child.

- During the process of the review of existing evaluation data for both initial evaluations and reevaluations, the IEP team and other qualified professionals, as
appropriate, must identify the educational needs of the student, as well as his or present levels of academic achievement and related developmental needs.

INDIVIDUALIZED EDUCATION PROGRAMS (IEP)

- For students with IEPs transferring from both in-state and out-of-state, the school district/agency must provide the students with a free appropriate public education (FAPE), in consultation with the parents, including services comparable to those described in the previous IEP. This IEP must be in effect until the previous IEP is adopted or a new IEP is developed, adopted, and implemented.

- The transfer of records must be coordinated between receiving and sending schools as expeditiously as possible. Assessments of students transferring from one school district to another school district in the same academic year must be coordinated with the students' sending and receiving schools, as necessary and as expeditiously as possible to ensure prompt completion of his or her full evaluation.

- The term "functional" is used a number of times in this section to state that the IEP must include a statement of the student's present levels of academic achievement and functional performance, that the statement of measurable annual goals must include academic and functional goals, if appropriate. The IEP team must consider the academic, developmental, and functional needs of the student. Additional guidance will be provided.

- The IEP must list not only the transition services required for the student to reach his or her goals, but must now include a description of the link between transition goals for post-school activities and the student's academic program. Please note that the definition of "transition" states that it means a coordinated set of activities for a student with a disability that is "designed to be within a results-oriented process that is focused on improving the academic and functional achievement of the child with a disability to facilitate the child's movement from school to post-school activities..."

- For a student whose eligibility terminates due to graduation from secondary school with a regular state high school diploma, or due to exceeding the age of eligibility for a FAPE, the school district/agency must provide the student with a summary of his or her academic achievement and functional performance, which must include recommendations on how to assist the student in meeting his or her postsecondary goals.

- The IEP must include a statement of the special education and related services and supplementary aids and services, based on peer-reviewed research to the extent practicable, to be provided to the student or on behalf of the student. For example, the student will receive direct instruction in the area of basic reading skills outside the general education classroom for one hour daily.
PROCEDURAL SAFEGUARDS AND DUE PROCESS

• A party receiving a due process hearing request may challenge the sufficiency of the due process hearing request within fifteen days of receiving the request. The recipient of the due process hearing request must, within ten days of receiving the request, send the party requesting the due process hearing a response that specifically addresses the issues raised in the request.

• A school district/agency must convene a resolution session unless waived in writing by the parents and school district/agency or the parties agree to use mediation. School district/agency attorneys may not participate in a resolution session unless the parents bring an attorney.

• When a resolution is reached during mediation, the parties must execute a written legally binding agreement that is enforceable in any state or federal court.

• Attorney’s fees may be sought if a school district/agency believes the parents’ attorney or the parents’ claim is frivolous or brought for an inappropriate purpose.

SUMMARY

School districts and state agencies must be in compliance with the areas outlined in this memorandum by July 1, 2005. The submission of revised policies and procedures is not required until both state and federal regulations are promulgated. There are provisions in the IDEA ‘04 that revise a number of requirements that the state will continue to follow until the necessary changes are made to state and federal regulations. One example is the requirement in the SBE regulations that short-term objectives are included in IEPs. Another example is the current discipline requirements. Please keep in mind that until our SBE regulations in these areas are revised, our state will continue to retain all current requirements. There are a number of other areas included in the reauthorized IDEA that will require clarification and interpretations through the federal regulations. There are also areas, such as specific learning disabilities, which will require additional study by the SDE prior to the provision of guidance.

We hope this information is helpful to you. We will provide additional clarification and interpretations as they become available. Please contact us at 803-734-8224 if you have questions.

SDD/Is
cc: School District Attorneys
Appendix L

Turn It In

This document was scrutinized through Turnitin.com as a procedure required by Educational Leadership at Clemson University on February 23, 2009.
REFERENCES


*Education for All Handicapped Children Act of 1975, Public Law 94-142.*


Individuals with Disabilities Education Act of 1990 (Public Law No. 101-476).

Individuals with Disabilities Education Act Amendments of 1997 (Public Law No. 105-17). 20 U. S. C. Sec. 1400 et seq.


Zucker, L. G. & Tolbert, P. S. (Eds.) (1994) Institute for Social Science Research. *Institutional analyses of organizations: legitimate but not institutionalized* (Vol. 6, No. 5). Los Angeles, CA.