

RECRUITMENT AND ENROLLMENT

Intermediate School District as Fiscal Agent

Intermediate School Districts (ISDs) and consortia of ISDs are the grantees of GSRP funding. ISDs may choose to directly administer GSRP classrooms or develop agreements with eligible subrecipients to provide GSRP. Eligible subrecipients are: school districts, public school academies, local governments, and public or private, non-profit or for-profit agencies.

Children who reside within the geographic boundaries of the ISD can be enrolled by any subrecipient. However, it is suggested that each ISD and its subrecipients within the ISD form an agreement regulating the enrollment of children across subrecipient boundaries. This may prevent competition among subrecipients. If the family moves after the child has enrolled, the program may continue to serve the child for the remainder of the program year, with the family providing transportation.

Children may also be enrolled across ISD boundaries. To utilize this provision, before enrolling a child from another ISD, an ISD must enter into a written agreement with the resident ISD. See the subsection, *Cross-ISD Enrollment* in the [Budget](#) section of this manual for details on enrolling, formulating written agreements, and accounting for cross-ISD children.

Interagency Collaboration

GSRP and Head Start programs in Michigan are required to collaborate in PreK recruitment and enrollment activities. Best practice is to utilize one PreK application for all state and federally funded programs and share one waiting list. The local Great Start Collaborative could be asked to facilitate this work to ensure that as many of the community's children as possible take part in a program. If a program enrolls a child who is *eligible for or dually enrolled in* an additional funded PreK program, it prohibits another child from participating in the GSRP who may only be eligible for GSRP. Refer to [resources](#) for this section on collaboration.

Guidelines for Developing a Recruitment, Referral, and Enrollment Protocol

Although GSRP and Head Start are designed to serve two different populations of children/families, both programs share a common goal: to ensure as many children as possible benefit from high-quality PreK programs. Therefore, each school readiness advisory committee must approve a collaborative recruitment and enrollment process to assist families in selecting the program best suited to their needs. A signed collaborative agreement includes the process and procedures, including timelines, for recruitment and enrollment. The ISD monitors to see that the procedures are followed by subrecipient staff.

While each region will create a protocol that is unique to area needs and resources, a strong recruitment, referral, and enrollment protocol will include specific items:

- Contact information for each program including name of person(s) having responsibility for recruitment, title(s), telephone number(s), e-mail address(s), and preferred mode of communication;
- Eligibility guidelines for each program;
- Recruitment and enrollment policies that allow families to learn about each program for which their children are eligible;
- Processes and timelines for mutual referrals among all available programs; and
- Appropriate signatures.

A protocol exhibiting best practice will include a common application. The common application should collect the required information from parents/guardians of each child for later verification of eligibility. In cases of single, separated, or divorced families, access to personal data provided to determine eligibility (e.g., tax forms, pay stubs, etc.) should be restricted to only the parent/guardian that provided that data. See the [ISD Administration of GSRP](#) section of this manual for additional information on maintaining and protecting child files and eligibility information. Programs may want to consider including a question on the application regarding permissions for discussing the application with others. Enrollment applications should collect:

- Age of child;
- School district/county of residence;
- Annual income;
- Potential program eligibility factors placing the child at risk of educational failure;
- Health information and proof of immunizations; and
- Parent/guardian permission to share information among programs to determine proper placement.

Recruitment

A well-developed plan for recruiting the children most at risk of school failure is essential. The local GSRP family participation group and the ISD School Readiness Advisory Committee should be involved in drafting the plan. Efforts to connect with families might include:

- Information given to home visit specialists through the ISD and community mental health agencies, translated into languages commonly spoken by families in the community;
- Posters displayed at local health departments, doctors' offices, libraries, post offices, hospitals, and businesses that draw young families such as laundromats, and grocery stores;
- Flyers or publications sent home with children enrolled in elementary school;
- Information in the local newspaper and on local radio and television stations, as well as other media outlets;
- Door to door census;
- Recruitment tables at local area fairs and festivals or events planned for families;
- Electronic community bulletin boards; and
- Displays at kindergarten orientation.

Referral of Head Start-Eligible Children

GSRP legislation requires specific collaboration when a child is eligible for Head Start. **An eligible child must be referred to Head Start.** The referral process within the protocol must identify which program is responsible for contacting families to inform them of the eligibility for Head Start. Once the family is aware of the eligibility, Head Start should contact the family to describe the services available. Families should be guided to make the program choice best suited to their needs. See the [Office of Great Start memorandum on family choice](#) in the resources for this section.

The Head Start program should follow-up with the referring GSRP regarding the family's decision. It is not recommended that families be responsible for the completion of a referral form and/or returning a referral form to GSRP.

A referral form from GSRP to Head Start should include:

- Date of referral, date forwarded to Head Start, and date received by Head Start;
- Family contact information: parent/guardian and child names, mailing address, phone number, e-mail address;
- Signatures of sending and receiving program representatives;
- Program placement decision;
- Explanation of family program preference (preferably written by the parent/guardian);
- Parent/guardian signature acknowledging parental choice and repercussions of the decision i.e., if choosing GSRP, their child will be included on a GSRP waiting list until the referral process with Head Start is completed;
- Date returned to GSRP; and
- Signature of Head Start representative.

GSRP enrollment is deferred while the referral to Head Start is completed. The completed referral form is documentation that agreed-upon procedures have been followed and also reports the placement outcome for each family that has been referred. The completed referral may document acknowledgement from program representatives and the parent/guardian that the family is income-eligible for one program and will be enrolled in another. If Head Start does not return the referral form, the GSRP grantee need only retain on file the original dated referral form to meet program requirements.

The protocol should detail the referral turn-around timeframe before a family is removed from the GSRP waiting list. Then, as openings occur, all the children on the list are considered so that the family with the greatest need is contacted first. This critical portion of written protocol helps to ensure common understanding among programs and service to the highest number of eligible children/families.

Head Start Referrals to GSRP

In addition, a protocol that formalizes a strong collaborative relationship among partners will document the Head Start program's steps for referring both applicants that do not qualify for Head Start and qualifying families on Head Start's waiting list to GSRP. Section 642(e) of the Head Start Act of 2007 details Head Start's requirements for collaborating with state-funded PreK programs. Refer to

[Authorization for Requirement to Collaborate](#) in the resources for this section for select sections of the Head Start Act of 2007.

Prioritization

Public Act (P.A.) 120 of 2024 in section 32d15 requires that each applicant be ranked by family’s federal poverty level (FPL) and that programs enroll children with families with the lowest income first. Please refer to the following prioritization chart for assistance, along with the detailed instructions provided below:

Prioritization Chart:

Month	Action
January 1 – April 30	Before accepting applications, establish the reserved percentage as outlined below.
	Applications are received and eligibility is determined.
	Families whose applications indicate they are eligible for Head Start must be referred to the Head Start program.
	Families indicating homelessness, foster care, or IEPs must be prioritized, up to the reserved percentage.
	Enroll families with incomes at or below 400% FPL, prioritizing based on income and program eligibility factors, up to the reserved percentage.
	If all families with incomes at or below 400% FPL have been enrolled, families with income levels above 400% FPL may be enrolled up to the reserved percentage prioritizing based on income <u>and local demographic data</u> .
May 1	ISDs enroll all families, regardless of FPL, up to the reserved percentage.
August 1	Begin utilizing the reserved percentage to enroll families based on income and eligibility factors, prioritizing families with the highest need first.
August 15	<u>If openings remain from the reserved percentage, enroll any remaining families including those with income above 400% FPL eligibility up to the full allocation.</u>

Each ISD must utilize a written prioritization process based on the required process in this section that provides clear direction for all GSRP staff. The ISD may also include local considerations for enrollment, special enrollment cases such as cross-ISD enrollment, and the enrollment of children with IEPs. It should include guidance for staff on situations where children present with similar income and program eligibility factors.

Step 1: Determining Reserved Percentage

Annually ISDs shall review their local enrollment data from the previous school year to determine the percentage of families at or below 400% who applied for GSRP after September 1. The ISD will reserve that percentage for late enrollment. This reserved percentage for children cannot be filled until August 1 of the current year.

Step 2: Accepting Applications

Beginning January 1, ISDs may begin accepting applications for the upcoming school year (i.e. on January 1, 2026, ISDs can begin enrolling in the 2026-27 school year). It is best practice that families are notified of placement and enrollment status in a timely manner, within 10 business days of determining eligibility. In cases where eligibility cannot be determined within that time frame, it is a best practice to communicate to families acknowledging receipt of the application and advising of next steps and/or estimated timelines to avoid confusion for families. A child is considered “enrolled” prior to the start of programming when eligible families have received confirmation of a placement in programming.

If the family’s first choice in location is full, an alternative location shall be provided. If the family declines the alternative location(s), programs may establish a waitlist. Programs are not allowed to put eligible families on a waitlist if there are openings at their preferred location, unless openings account for reserved percentage.

ISDs shall establish a method of tracking application and enrollment data, including date of application, date eligibility was determined, date family was notified of enrollment, if waitlisted, and program/classroom assigned.

Step 3: Head Start Referrals

All applications for families received by the ISD that meet the following criteria, shall be referred to Head Start before considering placement in a GSRP program:

- Income at or below 100% FPL
- Homelessness
- Foster care placement

A child who attended a Head Start program as a 3-year-old may be enrolled in a GSRP Head Start/Blend program without reverifying the family’s income following Head Start policy.

The ISD must retain documentation that all above families have been referred to Head Start prior to placement in a GSRP program. Enrollment may occur after the

GSRP and Head Start mutually agreed upon written referral process and timeline has been met. There are no exceptions to this requirement including the use of a centralized enrollment system where families have indicated a preference for a program other than Head Start.

Step 4: Enrollment of Families with income at or below 400% FPL

Once the ISD has calculated their reserved percentage, any applications from families that are NOT eligible for Head Start or that have incomes at or below 400% FPL, shall be enrolled starting as early as January 1, based on the following prioritization process:

- Calculate each family's actual FPL.
- Families who are homeless, in foster care placement, **and** have declined a Head Start placement, **or** have an individualized education program (IEP) are prioritized regardless of income.
- Remaining families are prioritized based on income levels ensuring families with the lowest income are enrolled first

Step 5: Enrollment of Families with income above 400% FPL

By May 1 each year, ISDs should begin enrolling families with incomes exceeding 400% FPL until all slots are filled, with the exception of the reserved percentage. If two or more applications are received simultaneously, the ISD shall prioritize based on income and eligibility factors such that children with the highest need are enrolled first.

Step 6: Using Reserved Percentage

Beginning August 1, ISD may use their reserved percentage. Prioritization must be based on income and eligibility factors, prioritizing families with the highest need first. Beginning August 15, an ISD may enroll any remaining families that apply or are on a waitlist.

If an ISD has reached their enrollment capacity prior to August 1 and receives an application from a family for a child with an IEP, experiencing homelessness, or in a foster care placement, the ISD may use the reserved percentage to enroll the child upon verification of eligibility prior to August 1.

An ISD that has reached their enrollment capacity prior to August 1 should consider requesting additional funding from MiLEAP, if available.

Reporting:

ISDs will report to the Michigan Department of Lifelong Education, Advancement, and Potential their enrollment numbers on a regular basis. Enrollment after the start of programming is defined as children who have attended at least one day of programming. Timelines for reporting will be determined by the department and include enrollment data based on income brackets. Additional data, including length

of time between families applying and notification of enrollment may also be requested.

Prioritization includes the following terms as defined below:

Applications	A family’s intent to enroll in GSRP using the ISDs method of collecting information on interested families.
Enrollment	Enrollment prior to the start of programming is defined as eligible families who have received confirmation of a placement in programming.
	Enrollment after the start of programming is defined as children who have attended at least one day of programming.

Considering Child and Family Additional Needs

When reviewing applications and considering children for enrollment, several aspects of child and family need and preference should be considered, including:

Wrap Around Care

As part of the local coordinated recruitment and enrollment process, families should be asked if they have a need for wrap around care. Families identifying such a need must be made aware of, and referred to, GSRP programs that provide before and after school care and summer programming for four-year-olds and their siblings. Within their identified income bracket, families who need wrap around care should receive enrollment priority within programs that offer these services.

No fees may be charged to apply for or become enrolled in GSRP programming. For those programs that offer additional service hours (before/after GSRP hours, holiday care, summer programming), tuition may be charged to families for the programming beyond GSRP hours.

Programs that have currently enrolled children that will be transitioning to their GSRP classroom, may have a prioritization policy to enroll their currently enrolled income eligible children before any new families are enrolled in their program.

CDC Scholarships

Programs offering supplementary tuition-based hours of care must be encouraged to accept CDC scholarships for families with incomes up to 200% of FPL. It is acceptable for programs to receive CDC scholarship funds and/or charge tuition for children enrolled in care before/after GSRP hours, holiday care, and summer programming.

Programs that have currently enrolled children receiving a CDC scholarship and are transitioning to the GSRP classroom, no additional income verification is needed. Documenting the family’s approval for the CDC scholarship eligibility is sufficient.

Families falling below 200% FPL, needing supplemental care for their four-year-old or other children in the family and not receiving CDC scholarships should be referred and encouraged to apply.

Head Start

Head Start programs may follow their own grantee enrollment policy and prioritize the enrollment of currently enrolled Head Start children transitioning into blended Head Start/GSRP or grantee GSRP classrooms ahead of enrolling any new children to the program.

Transportation

Families who need transportation services must be made aware of and referred to programs that provide transportation to and from their program. Every effort should be made to enroll families who need transportation in programs offering these services.

Developmental Delays or Diagnosed Disabilities

Throughout the application and enrollment process, please refer to the subsection *Special Education Eligible Children* within this section and the [Child Assessment](#) section for guidance when a child is identified as possibly experiencing developmental delays. Programs should not wait until the child is attending a program to facilitate the referral with the family. Homelessness or Foster Care

Any child experiencing homelessness or foster care must be given priority within this lowest income bracket. Please refer to the eligibility section for more information.

Early Entry Children

Priority for enrollment must be given to four-year-old children, regardless of income, before enrolling children with birthdates after September 1. Children who will turn four September 2-December 1 of the current year, may be enrolled if all eligible four-year-old children have been enrolled, there are no children on the waiting list, and there are additional vacancies within GSRP classrooms. The local prioritization process regarding income bracket and eligibility factors should also be applied to these children. ISDs must include in their policies timelines for enrolling children who will turn four September 2-December 1 based on historical enrollment trends.

Wait List

When all GSRP funded classroom openings are filled, each ISD must establish and maintain a waiting list of eligible children seeking placement when a space becomes available in a classroom. Eligibility of children on the waiting list must be verified and prioritization for possible enrollment determined as indicated in the Prioritization subsection above. Verification and prioritization of new applications remains a critical aspect of ensuring children with the greatest need are served first. Children on the waiting list are enrolled as space becomes available. In addition to children who are enrolled in GSRP, each ISD will enter GSRP-eligible children on the waiting list into the MSDS Early Childhood Spring Collection period.

Data required in MSDS will include date of birth, FPL bracket, and program eligibility factors. Each of these children will be issued a UIC.

Unique Enrollment Situations

Occasionally families with unique situations apply for enrollment in GSRP. When a child's parents are separated, special considerations must be made when calculating the FPL; the [Eligibility](#) section of this manual addresses methods to use based on the specifics of the situation. Enrollment decisions may also be affected when the child spends time with each parent. If parents disagree about the enrollment or if one is unable to transport the child to a mutually agreeable program, program staff are encouraged to work with both parents to support a decision in the best interest of the child. In no case may a child be enrolled in two GSRP classrooms at one time.

Additionally, each year some families will move. When a move is made to a nearby location, even if outside district boundaries, a child may remain in the current program as long as transportation can be arranged. When a family moves farther, every effort should be made to assist the family to enroll in another program based on the availability of space and funding as well as the needs of the child and family and on the appropriate prioritization of families on the waiting list, if any. This includes the transfer of the GSRP application, enrollment file, and screening and assessment data. A family moving to a new program should not be required to complete duplicate enrollment paperwork for eligibility determination. A child found eligible at any point during the program year remains eligible for the remainder of the year.

Combining Eligible and Non-Eligible Children in PreK Classrooms

Many areas in Michigan do not have sufficient numbers of children eligible to offer individual program classrooms but do have enough children in total to offer high quality PreK programs. Some programs have combined Head Start, Title I, and other funding streams to provide viable classrooms. Other programs have accepted tuition paying children through their community education programs to serve children who do not qualify for GSRP or Head Start. When braiding, each classroom would optimally include diverse children. The following issues must be addressed in administering combined programs:

- When even one child in a classroom is funded through GSRP, all GSRP guidelines must be followed: staff credentialing, curriculum, assessment, family involvement, etc.
- The funding for each enrolled child should be clear: Title I funds can be used to supplement GSRP funds, but a child cannot be enrolled in two such programs within the same program year.
- Additional children who meet the GSRP guidelines for eligibility may be enrolled beyond the funded number if the program can accommodate them, but additional funding is not available through Michigan Department of Lifelong Education, Advancement, and Potential (MiLEAP) grants.
- Additional children, whether eligible or not, can be enrolled in a GSRP classroom, thus rendering it a braided funding classroom. GSRP funding can

be used for materials and supplies for the children who are not eligible. There must be documentation that tuition, other sources of cash, and/or in-kind funding are equivalent to the amount of state funding which supports each GSRP child (i.e., if audited the GSRP must be able to show that GSRP funds were not spent on children not eligible for GSRP, with the expectation of supplies and materials) as specified in the [Budget](#) section. Programs where administration and facilities are provided by the subrecipient as in kind must maintain careful documentation clarifying cost share.

- When braiding GSRP and Early Childhood Special Education (ECSE), an issue for discussion may be whether the program would generate a full-time equivalent of special education funding; the interface between the Michigan Administrative Rules for Special Education and the State School Aid Act warrants considerable attention.
- Over age children who are eligible for kindergarten, cannot be enrolled in GSRP, no matter what their individual levels of development might be. This is explicit in the legislation and will require return of the state funding for each over age child served. "Holding out" or "redshirting" of children has not been effective in increasing children's academic performance; children who are "over age" for their grade, no matter the circumstances, tend to do more poorly in school. However, GSRP cannot dictate the parameters around enrolling children with other funding; therefore braided-funding classrooms may include over-age children.

Special Education Eligible Children

A child with an Individualized Education Program (IEP) may be placed in a GSRP classroom in two ways:

1. **IEP Prioritization:** A child with a current IEP must be given first priority for enrollment in a GSRP classroom regardless of actual family income unless the IEP Team has determined that the child's educational needs can only be met in a more restrictive, self-contained classroom setting, (The actual family income must still be collected and reported in Michigan Student Data System (MSDS). or
2. **Blended Programming:** A child with a current IEP who is enrolled in a program such as Head Start or an ECSE classroom that is blended with GSRP. (Program blending requires that the highest licensing and rule requirement of each program be met in the blended setting).

ISDs must have a documented policy addressing both the enrollment process for children with IEPs in GSRP classrooms and guidance for ensuring best practices for inclusion classrooms that provides clear direction for all GSRP staff. Those children that have IEPs must be given priority within this lowest bracket. Actual family income must also be collected and reported in Michigan Student Data System (MSDS).

Federal Guidance on Inclusive PreK Settings

In a [Dear Colleague Letter](#) from September 2017, the Office of Special Education Programs ([OSEP](#)) defines inclusive practices as those delivered "*in the child's*

classroom in the course of daily activities and routines in which all children in the classroom participate (e.g., 'circle time', 'learning centers'). While “services delivered in other locations that remove the child from the opportunity to interact with nondisabled children would not be considered as being received in the Regular Early Childhood Program. These include, but are not limited to, services delivered in a 1:1 therapeutic setting, or in a small group comprised solely of children with disabilities in another location within the building where the regular early childhood program is located” (e.g., speech or physical therapy delivered via a time-restricted session two- or three-times weekly).

Additionally, in the Dear Colleague Letter referenced above, OSEP states, “*in determining the educational placement of a child with a disability, including a preschool child with a disability, the public agency must ensure that each child’s placement decision is made by a group of persons, including the parents, and other persons knowledgeable about the child, the meaning of the evaluation data, and the placement options...*”

In 2023, the Departments of Education (ED) and Health and Human Services (HHS) jointly released an updated [Policy Statement](#) on Inclusion of Children with Disabilities in Early Childhood Programs. In this document they state that all young children with disabilities should have access to high-quality inclusive early childhood programs that provide individualized and appropriate support so they can fully participate alongside their peers without disabilities, meet high expectations, and achieve their full potential.

Enrollment of children with IEPs

An IEP qualifies the child for GSRP regardless of income and allows the ISD to prioritize enrollment within the lowest bracket *but does not guarantee placement in GSRP*. GSRP is often an ideal inclusive general education placement for children with special needs. The intent of this provision in legislation is to create placement opportunities for children with IEPs within high-quality inclusive settings. As with all children, the family must complete an application for GSRP and the collaborative enrollment and prioritization processes must be followed, including referral to Head Start.

GSRP is first and foremost a targeted program for income eligible children at risk for low educational attainment. Statewide, publicly funded general education PreK has previously only been able to serve approximately 60% of the income eligible population. Even with newly available expansion funding, the system *is not yet capable of accommodating every child with an IEP regardless of the complexity of the child’s special education needs*. GSRP and special education staff must work closely together to evaluate each child’s strengths and needs alongside the family’s available resources and supports.

ISD Prioritization of Children with IEPs

The full intent of GSRP statute detailing prioritization of children found within Section 32d (8)(b) must be carefully adhered to (emphasis added for clarity):

The enrollment process must consider income and risk factors, such that children determined with higher need are enrolled before children with lesser need. For purposes of this subdivision...all age-eligible children served in

foster care or who are experiencing homelessness or who have individualized education programs are considered to live with families with household income equal to or less than ... 400% of the federal poverty guidelines regardless of actual family income and are prioritized for enrollment within the lowest bracket.

Having an IEP qualifies a child for GSRP but does not guarantee placement within a GSRP classroom. The appropriate inclusive PreK placement for a child with an IEP may be GSRP, or could be one of several other program setting types including district run tuition PreK, Head Start, public school academy, or center- or home-based licensed child care. The IEP, as a document, is just one aspect of the process and does not establish guaranteed enrollment in GSRP. The IEP, an application for GSRP, and any additional available information must be considered within the GSRP prioritization process.

It is incumbent upon the ISD administrators to develop a non-discriminatory process for determining GSRP eligibility and prioritization for children with IEPs. It is imperative that the process is effective for both GSRP and special education at the ISD and local levels. The ISD can ensure the process is achievable and clear to all involved by including the ECC and ISD special education leaders, special education partners in local districts, GSRP subrecipient administrators, families, and community advisors in creating or reviewing the process. The written process must include criteria for evaluating each child's prioritization for enrollment.

The prioritization process must be closely tied to a process for determining the placement for any child with an IEP. The ISD must ensure that the placement in GSRP includes a detailed plan for a child with an IEP to receive all of the special education and related services and supplementary aids and services included in the child's IEP in order to meet the needs of the particular child. It must also assure that the inclusive setting has policies and practices that enable the child's full participation and success.

Finally, the ISD must monitor carefully the number of children with IEPs (whether the IEP is a Qualifying IEP or not), placed in each GSRP classroom to ensure successful inclusive programming. Individual classroom needs and resources must be taken into consideration, such as the variety and degree of disability as well as adult/child ratio in a classroom.

Placement Considerations

The GSRP prioritization process stands separately from the IEP Team process. When making a placement decision for a child with a diagnosed disability, the IEP team must follow the regulations of [Individuals with Disabilities Education Act](#) (IDEA) and the [Michigan Administrative Rules or Special Education](#) (MARSE). These rules and regulations ensure a child with an IEP of specific procedural and civil rights. Consider this excerpt from *The Law and Special Education* by Mitchell Yell:

- A student with disabilities has the right to be educated with students in the general education environment. The general education environment is considered the least restrictive setting because it is the placement in which there is the greatest measure of opportunity for proximity and communication with the "ordinary flow" of students in schools.

- The less a placement resembles the general education environment, the more restrictive it is considered. Specifically, a student with disabilities has the right to be educated in a setting that is not overly restrictive considering what is appropriate for that student. Appropriateness entails an education that will provide meaningful benefit for the student. When the educational program is appropriate, a student with disabilities should be placed in the general education environment, or as close to it as is feasible, so long as the appropriate program can be provided in that setting.
- Although placement in the general education classroom may be the least restrictive environment (LRE) for some students with disabilities, it is not required in all cases. The IDEA requires inclusion when the general education classroom setting can provide an appropriate placement.
- The IDEA requires that, when appropriate, students with disabilities be educated in settings with children without disabilities. The law provides that: to the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities are educated with children who are not disabled, and that special classes, special schooling, or other removal of children with disabilities from the regular educational environment occurs only when the nature or severity of the disabilities is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily (IDEA, 20 U.S.C. 14129a)(5)(A)).
- There are two parts to the LRE requirement of the IDEA. The first addresses the presumptive right of all students with disabilities to be educated with students without disabilities. Schools must make good-faith efforts to place and maintain students in less restrictive settings. This presumptive right, however, is rebuttable; that is, the principle sets for a general rule of conduct (i.e., integration) but allows it to be rebutted when integration is not appropriate for the student.
- There are three major placement errors that IEP teams need to avoid. First, placement decisions should not be based solely on factors that are unrelated to a student's actual needs. Examples of such factors include determining a student's placement based on a student's category of disability, the severity of a student's disability, the availability of services, or administrative convenience. Second, a student's placement must not be predetermined. Predetermination of placement occurs when an IEP team decides on a student's placement prior to the actual IEP meeting. This does not mean that the IEP team members cannot come to the meeting with opinions and even a draft IEP, but that a final placement decision cannot be made until the parents/guardians are present and meaningfully involved in that decision. Third, an IEP team should not determine a student's placement prior to developing his or her IEP. The federal regulations to the IDEA require that a student's placement "must be based on the child's IEP" (IDEA Regulations, 34 C.F.R. 300.116[b]).

These rules and regulations are complicated when considering inclusive placements because there is not a universal opportunity for all children in PreK, as there is for children in kindergarten through 12th grade. **However, to meet the applicable rules and regulations for a child with an IEP who may be enrolled in a general education classroom program, either a GSRP or a Head Start**

representative, or both, should be included in the IEP team meeting and included in all conversations and decisions regarding the child’s appropriate accommodations, modifications, and placement.

The IEP process should carefully consider all of the following prior to completing an IEP for a PreK-age child.

- Do all parties feel that the IEP fully meets the child's needs?
- Does the IEP include a recommendation from the IEP team that the child be placed in an inclusive PreK setting?
- What is the least restrictive environment in which the child can participate with any needed modifications and/or accommodations?
- What additional support or accommodations will be necessary so the child can successfully participate fully in the activities and environment of GSRP?
- How will special education services be delivered? Best practice for inclusive programming sees services “pushed in” to the regular education setting as indicated by OSEP.
- Does the IEP documentation include with specificity any needed consultation or training supports for staff members to adequately support the child in the least restrictive environment?

Planning for a child to attend both part-day GSRP and part-day ECSE, is not generally supported. Transitions between programs is a critical factor as these often create a burden for families, disrupt service delivery, and may interrupt child progress. If discussed as a possibility, there are many additional considerations such as:

- Is it in the child's best interests to participate in two programs, possibly with different facilities, staff, peers, routines, behavior, and academic expectations?
- If the child transfers each day between programs, how are his/her lunch and rest period accomplished?
- How will teaching teams in both programs communicate the daily needs of the child? Ongoing goals and progress?
- How will programs collaborate and coordinate communication with the family?

Lawrence, S., Smith, S., Banerjee, R., Preschool Inclusion Key Findings from Research and Implications for Policy (April 2016)

<https://files.eric.ed.gov/fulltext/ED579178.pdf>

U.S. Department of Education, Office of Special Education Dear Colleague Letter on Inclusive High-Quality Early Childhood Programs (Jan. 9, 2017)

[Dear Colleague Letter \(DCL\) related to Preschool Least Restrictive Environments \(LRE\) \(PDF\)](#)

U.S. Department of Human Services & U.S. Department of Education, Policy Statement on Inclusion of Children with Disabilities in Early Childhood Programs (Nov. 28, 2023) <https://sites.ed.gov/idea/files/policy-statement-on-inclusion-11-28-2023.pdf>

Yell, M.L. (2019). *The Law and Special Education* (5th Ed.). NY: Pearson.