

## FREQUENTLY ASKED QUESTIONS – PRIVATE SCHOOL PERSONNEL

The Private School Personnel FAQs are designed to address questions applicable to approved private schools. Note that private school teachers are not required to be “fully certified”.

### TABLE OF CONTENTS

Q1: WHY DOES THE OFFICE OF SPECIAL EDUCATION PROGRAMS (OSEP) COLLECT PERSONNEL DATA? THERE IS NO STATUTORY BASIS FOR THIS DATA COLLECTION. ....	3
Q2: AS A PRIVATE SCHOOL, WHY DO I HAVE TO COMPLETE THIS DATA COLLECTION REQUIREMENT? .....	3
Q3: WHY DOES OSEP COLLECT PERSONNEL DATA WHEN DATA ON FULLY CERTIFIED TEACHERS ARE COLLECTED UNDER THE EVERY STUDENT SUCCEEDS ACT (ESSA)? .....	3
Q4: WHY ARE TEACHERS REPORTED ACCORDING TO THE AGE OF THE CHILDREN THEY TEACH (3–5, 6–21) RATHER THAN WHETHER THEY TEACH PRESCHOOL OR SCHOOL AGE CHILDREN? .....	3
Q5: IS PERSONNEL DATA REPORTED BY SCHOOL OR BY DISTRICT? .....	3
Q6: HOW ARE PERSONNEL COUNTS REPORTED? .....	3
Q7: HOW MANY DECIMALS CAN BE USED TO REPORT FTE?.....	3
Q8: SHOULD FTE BE BASED ON THE LENGTH OF THE SCHOOL DAY OR THE ACTUAL HOURS EMPLOYED?.....	4
Q9: SHOULD THE LUNCH HOUR BE CONSIDERED AS PART OF THE SCHOOL DAY WHEN CALCULATING FTE? .....	4
Q10: HOW DO I REPORT FTE FOR PERSONNEL (EMPLOYED OR CONTRACTED) WHO ONLY PROVIDE A FEW HOURS OF SERVICE PERIODICALLY DURING THE SCHOOL YEAR?.....	4
Q11: SHOULD I REPORT CONTRACTED EMPLOYEES? .....	4
Q12: WHAT ARE THE REQUIREMENTS FOR SPECIAL EDUCATION TEACHERS?.....	4
Q13: ARE PRIVATE SCHOOL TEACHERS REQUIRED TO BE FULLY CERTIFIED?.....	5
Q14: WHAT DOES IT MEAN TO BE THE "TEACHER OF RECORD"? .....	5
Q15: WHAT DOES IT MEAN IF YOU ARE NOT THE “TEACHER OF RECORD”? .....	5
Q16: WHICH PARAPROFESSIONALS SHOULD BE REPORTED IN THIS TABLE? THAT IS, WHAT TYPES OF WORK ASSIGNMENTS ARE RELEVANT?.....	5
Q17: HOW SHOULD PERSONNEL WHO ARE FULLY CERTIFIED TO TEACH IN SOME SUBJECTS BUT NOT OTHERS BE REPORTED? .....	5
Q18: DOES “FULLY CERTIFIED” INCLUDE OTHER STATE CERTIFICATIONS? .....	5
Q19: WHAT IF THERE ARE NO CERTIFICATION REQUIREMENTS FOR A POSITION? .....	5

Q20: SHOULD REGULAR EDUCATION TEACHERS WHO WORK WITH CHILDREN WITH DISABILITIES BE INCLUDED? .....6

Q21: HOW SHOULD INCLUSION TEACHERS WORKING WITH STUDENTS AGES 6–21 BE REPORTED? THESE TEACHERS ARE NOT REQUIRED TO BE FULLY CERTIFIED. THEY SUPPORT THE REGULAR EDUCATION TEACHER AND DO NOT GIVE GRADES, BUT THEY MEET THE STATE QUALIFICATIONS FOR THE POSITION. ....6

Q22: SHOULD I REPORT ONLY THE RELATED SERVICES PERSONNEL WHO PROVIDE SERVICES SOLELY TO SPECIAL EDUCATION STUDENTS? .....6

Q23: SHOULD I REPORT PERSONNEL DATA FOR THE ENTIRE SCHOOL YEAR?.....6

Q24: WHY DOESN'T THIS REPORT INCLUDE A COMPLETE LIST OF SPECIAL EDUCATION PERSONNEL AND RELATED SERVICE PROVIDERS? .....6

Q25: WHY ISN'T THE PSYCHOLOGIST CATEGORY LABELED SCHOOL PSYCHOLOGIST?.....6

Q26: WOULD CERTIFIED OCCUPATIONAL THERAPY AIDES BE REPORTED UNDER OCCUPATIONAL THERAPISTS ON SECTION C? .....6

Q27: SHOULD VISION TEACHERS BE REPORTED? .....6

Q28: HOW DO I REPORT GIFTED TEACHERS? .....6

Q29: WHERE CAN I FIND SPECIAL EDUCATION CERTIFICATION REQUIREMENTS FOR ARIZONA? 7

Q30: HOW DO YOU REPORT RESOURCE OFFICERS DEALING WITH SPECIAL EDUCATION STUDENTS HAVING DISCIPLINE PROBLEMS?.....7

Q31: HOW SHOULD SPANISH INTERPRETERS BE REPORTED?.....7

Q32: ARE NURSING ASSISTANTS REQUIRED TO BE LICENSED/CERTIFIED? .....7

Q33: IF A SCHOOL NURSE ADMINISTERS MEDICATION TO SPECIAL EDUCATION STUDENTS ON A DAILY BASIS (NOT WRITTEN INTO THE IEP), SHOULD THESE PERSONNEL BE COUNTED IN SECTION C OF THE PERSONNEL REPORT AND IF SO, HOW SHOULD FTE BE CALCULATED? .....7

Q34: CAN PSYCHOLOGY INTERNS BE REPORTED WITH PSYCHOLOGISTS IN SECTION C? .....7

Q35: HOW WOULD A SPEECH LANGUAGE PATHOLOGY ASSISTANT (SLPA) OR AN OCCUPATIONAL THERAPY ASSISTANT (OTA) BE REPORTED?.....7

Q36: SOME RELATED SERVICE PROVIDER CATEGORIES (I.E., OT, PT, OTA, SLPA) REQUIRE LICENSURE. HOW WOULD THESE BE REPORTED?.....8

**Q1: WHY DOES THE OFFICE OF SPECIAL EDUCATION PROGRAMS (OSEP) COLLECT PERSONNEL DATA? THERE IS NO STATUTORY BASIS FOR THIS DATA COLLECTION.**

A: Section 618(a)(3) of the Individuals with Disabilities Education Act (IDEA) gives OSEP the authority to collect personnel data. OSEP uses the data about special education teachers for two of its *Government Performance and Results Act (GPR)* indicators. Currently, these indicators are:

- the number of states with at least 90% of special education teachers of children with disabilities ages 6 through 21 who are fully certified in the areas in which they are teaching; and
- the number of states with at least 90% of preschool special education teachers certified in the areas in which they are teaching.

**Q2: AS A PRIVATE SCHOOL, WHY DO I HAVE TO COMPLETE THIS DATA COLLECTION REQUIREMENT?**

A: All approved private schools must submit a Statement of Assurance to the Arizona Department of Education/Exceptional Student Services (ADE/ESS) based on requirements outlined in Arizona Administrative Code (AAC) R7-2-402. The obligation of private schools to submit special education personnel data is found in AAC R7-2-402(C)(3), which states: “Provide certificated special education teachers in each classroom to implement the IEPs of those students assigned to that classroom.” By submitting this data, you are meeting the requirements of state regulations governing approved private schools. If you fail to submit personnel data, you are in violation of both Arizona Administrative Code and the Statement of Assurance you submitted to ADE/ESS and your private school approval may be revoked.

**Q3: WHY DOES OSEP COLLECT PERSONNEL DATA WHEN DATA ON FULLY CERTIFIED TEACHERS ARE COLLECTED UNDER EVERY STUDENT SUCCEEDS ACT (ESSA)?**

A: The data reported under IDEA are submitted as an individual person count by full-time equivalency (FTE). The data reported under ESSA are submitted as a count of classrooms.

**Q4: WHY ARE TEACHERS REPORTED ACCORDING TO THE AGE OF THE CHILDREN THEY TEACH (3–5, 6–21) RATHER THAN WHETHER THEY TEACH PRESCHOOL OR SCHOOL AGE CHILDREN?**

A: The age groupings (3–5 and 6–21) used by OSEP reflect the age groupings that are specified in IDEA.

**Q5: IS PERSONNEL DATA REPORTED BY SCHOOL OR BY DISTRICT?**

A: Data is reported by district. Several years ago, we asked for this data by school. This data is now collected at the district level.

**Q6: HOW ARE PERSONNEL COUNTS REPORTED?**

A: Personnel numbers should be reported by FTE of assignment. Decimals may be used.

**Q7: HOW MANY DECIMALS CAN BE USED TO REPORT FTE?**

A: ESS has decreased the decimal values from 3 places to 2 places for FY 2012 and beyond to be consistent with federal reporting requirements.

**Q8: SHOULD FTE BE BASED ON THE LENGTH OF THE SCHOOL DAY OR THE ACTUAL HOURS EMPLOYED?**

A: FTE should be based on the length of the school day.

**Q9: SHOULD THE LUNCH HOUR BE CONSIDERED AS PART OF THE SCHOOL DAY WHEN CALCULATING FTE?**

A: The lunch hour can be included in the FTE only if personnel are providing special education and related services to students with disabilities during that period of time.

**Q10: HOW DO I REPORT FTE FOR PERSONNEL (EMPLOYED OR CONTRACTED) WHO ONLY PROVIDE A FEW HOURS OF SERVICE PERIODICALLY DURING THE SCHOOL YEAR?**

A: FTE can be calculated by day, week, month, or even year. Determine the number of hours in a school day, week, month, or year and divide the number of hours calculated into the number of services hours provided. Report the resulting FTE accordingly. If the FTE figure is .009 or less, you will not be able to report this FTE since the application does not accept figures with more than 2 decimal places.

Example 1 – To calculate FTE based on a school day:

A part-time resource room teacher working 4 hours per day (in a 6-hour school day) would be  $4 / 6 = .67$ .

Example 2 – To calculate FTE based on a school week:

An SLP visits once a week for 4 hours.

5 school days in a week x 6 hours a day = 30 hours.

$4 / 30 = .13$

Example 3 – To calculate FTE based on a school year:

An audiologist visits a few times during the school year for a total of 15 hours.

180 school days x 6 hours a day = 1,080 hours.

$15 / 1,080 = .0138888$

Round off to 2 decimal places = .01

**Q11: SHOULD I REPORT CONTRACTED EMPLOYEES?**

A: Yes. You must report contracted employees as either fully certified or not fully certified (teachers, paraprofessionals, and related service providers).

**Q12: WHAT ARE THE REQUIREMENTS FOR SPECIAL EDUCATION TEACHERS?**

A: A special education teacher must have a bachelor's degree and full state certification as a special education teacher. For a special education teacher of record in a core academic subject area, a teacher is required to meet the same subject matter competency requirements the same as elementary, middle grade, junior high, and secondary teachers.

**Q13: ARE PRIVATE SCHOOL TEACHERS REQUIRED TO BE FULLY CERTIFIED?**

A: No, private school teachers are not required to be fully certified. However, if they meet the State standard for fully certified, they can be reported as such under column 3 in section A of the Personnel report.

**Q14: WHAT DOES IT MEAN TO BE THE "TEACHER OF RECORD"?**

A: A teacher of record directly instructs, evaluates, and assigns grades to students in core academic subjects.

**Q15: WHAT DOES IT MEAN IF YOU ARE NOT THE "TEACHER OF RECORD"?**

A: A special education teacher does not have to demonstrate subject-matter competency in core academic subjects if the teacher's role is limited to providing fully certified teachers with consultation on adapting curricula, using behavioral supports and interventions, selecting appropriate accommodations or if the teacher does not directly instruct students in those subjects, such as assisting students with study or organization skills or providing reinforcing instruction to a student who already received instruction from a teacher who is fully certified in that core academic subject. Special education teachers who are not the "teacher of record" are then determined fully certified by virtue of having the appropriate Arizona Special Education Certificate.

**Q16: WHICH PARAPROFESSIONALS SHOULD BE REPORTED IN THIS TABLE? THAT IS, WHAT TYPES OF WORK ASSIGNMENTS ARE RELEVANT?**

A: As defined on pages 1 & 2 of the instructions, the term "paraprofessional" includes employees who: (1) provide one-on-one tutoring if such tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher; (2) assist with classroom management such as organizing instructional and other materials; (3) provide instructional assistance in a computer laboratory; (4) conduct parental involvement activities; (5) provide support in a library or media center; (6) act as translators; or (7) provide instructional support services under the direct supervision of a teacher.

**Q17: HOW SHOULD PERSONNEL WHO ARE FULLY CERTIFIED TO TEACH IN SOME SUBJECTS BUT NOT OTHERS BE REPORTED?**

A: Special education teachers must meet fully certified requirements for every core academic subject they teach. See the definition of fully certified for the IDEA under 34 CFR §300.156(c). If a teacher is not fully certified to teach a given subject that he or she teaches, that teacher should be reported as not fully certified for the FTE associated with teaching any such subject.

**Q18: DOES "FULLY CERTIFIED" INCLUDE OTHER STATE CERTIFICATIONS?**

A: No. "Fully certified" only refers to Arizona certification. Certification in other states is not applicable.

**Q19: WHAT IF THERE ARE NO CERTIFICATION REQUIREMENTS FOR A POSITION?**

A: If there are no Arizona certification requirements for a position, the employee is considered fully certified.

**Q20: SHOULD REGULAR EDUCATION TEACHERS WHO WORK WITH CHILDREN WITH DISABILITIES BE INCLUDED?**

A: No.

**Q21: HOW SHOULD INCLUSION TEACHERS WORKING WITH STUDENTS AGES 6–21 BE REPORTED? THESE TEACHERS ARE NOT REQUIRED TO BE FULLY CERTIFIED. THEY SUPPORT THE REGULAR EDUCATION TEACHER AND DO NOT GIVE GRADES, BUT THEY MEET THE STATE QUALIFICATIONS FOR THE POSITION.**

A: You can either count these individuals as teachers who are not fully certified or as paraprofessionals who are qualified.

**Q22: SHOULD I REPORT ONLY THE RELATED SERVICES PERSONNEL WHO PROVIDE SERVICES SOLELY TO SPECIAL EDUCATION STUDENTS?**

A: No, personnel who work with both children who do and who do not have disabilities should not be excluded from this report. However, report only the FTE such personnel spend working with children with IEPs and service plans for this data collection. Personnel who do not work at all with children with disabilities should not be represented in this data collection. This is one of the reasons that the personnel data collection uses FTE as a unit of measurement. The report of related service personnel should be based on the percentage of time that those personnel work with children with disabilities.

**Q23: SHOULD I REPORT PERSONNEL DATA FOR THE ENTIRE SCHOOL YEAR?**

A: No. You must report personnel employed or contracted to provide special education and related services *on or about October 1st of the reporting year.*

**Q24: WHY DOESN'T THIS REPORT INCLUDE A COMPLETE LIST OF SPECIAL EDUCATION PERSONNEL AND RELATED SERVICE PROVIDERS?**

A: This report is not intended to be a comprehensive count of all types of personnel providing services to students with disabilities. Report only those personnel specified.

**Q25: WHY ISN'T THE PSYCHOLOGIST CATEGORY LABELED SCHOOL PSYCHOLOGIST?**

A: The personnel category labels come from the definition of related services in IDEA. That definition refers to psychological services, not just those provided by a school psychologist. Therefore, the label will not be changed.

**Q26: WOULD CERTIFIED OCCUPATIONAL THERAPY AIDES BE REPORTED UNDER OCCUPATIONAL THERAPISTS ON SECTION C?**

A: No. Since Section C does not specify a category for Occupational Therapy Aides, they should not be included in the personnel report.

**Q27: SHOULD VISION TEACHERS BE REPORTED?**

A: No. Since none of the sections specify a category for vision teachers, they should not be included in the personnel report.

**Q28: HOW DO I REPORT GIFTED TEACHERS?**

A: Gifted teachers are not to be included in any of the sections of the Personnel report.



**Q29: WHERE CAN I FIND SPECIAL EDUCATION CERTIFICATION REQUIREMENTS FOR ARIZONA?**

A: You can find the requirements for Early Childhood, Hearing Impaired, Severely and Profoundly Disabled, and Visually Impaired at:

<https://www.azed.gov/educator-certification/forms-and-information/certificates/>.

**Q30: HOW DO YOU REPORT RESOURCE OFFICERS DEALING WITH SPECIAL EDUCATION STUDENTS HAVING DISCIPLINE PROBLEMS?**

A: A resource officer is described as “a full sworn/commissioned law enforcement officer whose primary assignment is within the local schools for the purpose of enforcing laws (when applicable), conducting law-related workshops/presentations to the students, faculty, and parents, and counseling/mentoring students.” These personnel do not provide special education and related services and their role is not specific to special education. If the resource officer provides the same service to all students, but some (or most) just happen to be students with IEPs, then they shouldn’t be counted on the personnel report at all.

**Q31: HOW SHOULD SPANISH INTERPRETERS BE REPORTED?**

A: If a Spanish interpreter is working with a student due to EL/LEP status and not because of the student’s disability, you would not report the interpreter on the personnel report.

**Q32: ARE NURSING ASSISTANTS REQUIRED TO BE LICENSED/CERTIFIED?**

A: They are not required to be certified by ADE. We would assume they are required to be licensed as nursing assistants through the Board of Nursing (LPN license). Additional information can be found on the [Arizona Board of Nursing](http://www.aznursing.gov) web site.

**Q33: IF A SCHOOL NURSE ADMINISTERS MEDICATION TO SPECIAL EDUCATION STUDENTS ON A DAILY BASIS (NOT WRITTEN INTO THE IEP), SHOULD THESE PERSONNEL BE COUNTED IN SECTION C OF THE PERSONNEL REPORT AND IF SO, HOW SHOULD FTE BE CALCULATED?**

A: Given the definition of “medical/nursing personnel” (see page 7 of the personnel instructions), the personnel described would be excluded from this report. The school nurse is not involved in any diagnostic or evaluation work with special education students and this would not constitute enabling children to receive free appropriate public education (FAPE) as described in the IEPs, simply because of administering medication.

**Q34: CAN PSYCHOLOGY INTERNS BE REPORTED WITH PSYCHOLOGISTS IN SECTION C?**

A: If the intern(s) meets the standards for a psychologist as defined in Arizona, and also meets the definition of a psychologist and serves the functions outlined in statute (see Personnel Instructions or OSEP IDEA Part B Data Dictionary), report this individual in Personnel Report Section C.

**Q35: HOW WOULD A SPEECH LANGUAGE PATHOLOGY ASSISTANT (SLPA) OR AN OCCUPATIONAL THERAPY ASSISTANT (OTA) BE REPORTED?**

A: There is not a separate category for either SLPA or OTA in Section C of the Personnel report. However, if an SLPA or OTA meets the definition of a paraprofessional as defined in the Personnel instructions, the FTE of these personnel can be included in Section B.

**Q36: SOME RELATED SERVICE PROVIDER CATEGORIES (I.E., OT, PT, OTA, SLPA) REQUIRE LICENSURE. HOW WOULD THESE BE REPORTED?**

A: The term “Fully Certified” is defined as follows:

Fully certified refers to qualified personnel. The term also refers to: 1. Staff who hold appropriate certification and licensure for the position held, 2. Staff in personnel categories that do not require certification or licensure if the staff meet existing state standards or requirements for the position they hold, and 3. Staff in positions for which no state standards or requirements exist.

Therefore, categories that require licensure would be reported as “Fully Certified” if licensed and “Not Fully Certified” if not licensed.