



From plan to practice: 4 tips to prevent IEP implementation failure

Failing to fully implement a student's IEP is a critical compliance risk. The IDEA requires districts to [implement](#) every service, accommodation, and support outlined in the IEP. [34 CFR 300.323](#) (c).

"If it's in the IEP, it needs to be implemented," said Julie Reznik, attorney for Shipman & Goodwin LLP in Hartford, Conn.

Yet, vague language, team misunderstandings, and insufficient documentation remain common pitfalls that put districts in legal danger. For example, an Indiana district failed to implement a student's IEP due to poorly specified services and a lack of documentation regarding the provision of accommodations. See *Bethel Park Schs.*, [121 LRP 11743](#) (SEA IN 03/01/21).

Major IEP implementation errors can result in procedural violations or potential FAPE denial claims. To avoid such risks, districts must focus on clarity, communication, and proactive solutions. Reznik explains how districts can avoid IEP implementation mistakes.

1 Clarify, specify IEP components

"Clarity and specificity are two important aspects that can prevent [issues](#) pertaining to IEP implementation," Reznik said. Because whatever is [written](#) in the IEP must be implemented, it's essential to be as clear and specific as possible. For example, say a student has a math need and requires testing accommodations, she said. If the accommodation only applies to the area of math, this should be specified in the IEP. Ambiguities can cause confusion and lead to services being provided incorrectly or not at all, Reznik explained.

Districts can run into issues when the IEP includes components the student does not actually require or will not use, said Reznik. Detailed descriptions help ensure all supports are tailored to the student's unique needs. Additionally, the more specific the IEP is, the easier it is to ensure all team members understand their responsibilities, she said.

2 Foster teamwide understanding

"Ensuring team members understand what's in the IEP is important," Reznik said. The IEP team should gather to discuss the contents of the IEP and make certain implementation is feasible. It is also important for the team to discuss how the student will respond to each component, she said. "Is the student going to be open to a particular accommodation or modification that you're putting in the IEP? If not, you don't want to give rise to any implementation concern."

Teams should also have discussions with parents explaining what the IEP contains and what implementation will look like, said Reznik. The team should talk about any communication plans or data sharing they will put in place to include parents in the process. Having these conversations keeps everyone on the same page regarding what each part of the IEP means, she said.

3 Document services, compliance

Proper documentation is critical to showing the district is meeting its IEP implementation obligations, said Reznik. If the IEP says a service will be provided every week, each session should be documented in detail. She said having this in writing is important because if implementation questions arise, the district

will be able to demonstrate that it has been doing what is required by the IEP, she said.

In *Centerville-Abington Community Schools*, [123 LRP 20997](#) (SEA IN 06/26/23), an Indiana district successfully defended against an implementation failure claim by providing detailed documentation of related services provided to the student. The district used related service logs to demonstrate compliance.

4 Address issues proactively

If a district makes a minor, or de minimis, implementation [mistake](#), it might not always lead to a denial of FAPE, Reznik said. This might be the case if there is no impact on the student and he is still able to access his education. "Nevertheless, the district should be proactive and transparent about whatever the [issue](#) is and have discussions with the family," she said.

For example, if a service is missed, maybe there's a need for compensatory education, said Reznik. "It doesn't have to be minute for minute if a service of some kind hasn't been provided, but it does have to be provided in a manner that the student is brought up to speed."

[David Hodgins](#) is presenting the session [Staying on Track to Avoid IEP Implementation Failures at LRP's National Institute on Legal Issues of Educating Individuals with Disabilities®](#) on Wednesday, April 30, 2025.

See also:

- [Review 5 ways to write IEPs to ensure they can be implemented](#)
- [Fumbled IEP implementation? Here's how to recover](#)
- [Top IEP Missteps: How to Identify and Prevent the Most Frequent IEP Errors](#) by Amy E. Slater, Esq.

[Riley Atwater](#) covers special education issues for LRP Publications.

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