

Parent knowledge of the definition of FAPE in light of the *Endrew vs. Douglas County School Board* decision

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In 2017, the Supreme Court of the United States redefined Free and Appropriate Public Education (FAPE) for students with disabilities (SWD) in *Endrew F. v. Douglas County School District*. The Court's new standard for FAPE was more demanding than previous rulings. Parents of SWD are expected to participate in the special education program process and a more robust Individualized Education Program (IEP) should be implemented to ensure sufficient student progress. However, it is unknown how much parents know about the *Endrew F.* Case and what, if any, impact the case had on IEP meetings since the ruling. To determine knowledge and impact of the case, a national survey was distributed through social media and listservs to parents of SWD. Over 100 participants from across the United States (U.S.) responded to the anonymous survey. Demographic data analysis indicated most participants were highly educated, wealthy, white women. Using an exploratory mixed methods approach, the results of the research suggested most parents, specifically upper-class women, have little knowledge about *Endrew F.*, and have not seen changes in their child's IEP. Respondents indicated a desire for more information about *Endrew F.*, FAPE, and negotiating for their child. Implications for parents of SWD, advocacy organizations, and schools are discussed along with implications of the unique demographics of the participants.

Key Words: Endrew, Supreme Court, IEPs, Students with Disabilities, Parents, Advocacy

In March 2017, the Supreme Court interpreted the Individuals with Disability Education Act (IDEA) provisions on Free and Appropriate Public Education (FAPE) in a landmark decision in *Endrew F. v. Douglas County School District* (hereinafter *Endrew*).

The Supreme Court unanimously ruled to vacate the lower court's decision and remanded the case to the Circuit Court to apply the new standard created by the Supreme Court (Yell, 2019). The new standard stated, "to meet its substantive

obligation under the IDEA, a school must offer an IEP reasonably calculated to enable a child to make progress appropriate in light of the child's circumstances" (*Endrew*, 2017, p. 15) was "markedly more demanding than the 'merely more than de minimis' test" used previously by courts (*Endrew*, 2017, p. 14). The *Endrew* case increased the requirements of school districts to provide appropriately ambitious educational programming with opportunities for students with disabilities (SWD) to meet challenging objectives (Turnbull, Turnbull, & Cooper, 2018).

The pursuit for more definitive answers through the court system began with the parents of Andrew F. At the time, Andrew was an elementary student with autism whose parents believed he was making little to no progress on his Individual Education Program (IEP) goals in the public-school setting. Additionally, his goals were similar from year to year, despite his grade level and developmental changes. After his fourth-grade year, his parents subsequently enrolled him in a private school for students with autism. In the new school, his parents believed he progressed academically and behaviorally at a much faster pace than in his previous public school (Autin, Docherty, & Arogatus, 2018). His parents asked the school district for reimbursement of the private school tuition based on their belief that the public school did not provide an appropriate public education. After losing to the school in district court, the parents appealed the case to the 10th Circuit. Exploring the question of whether the school district denied Andrew a FAPE, the 10th Circuit held that if the school offered a promise of some educational benefit, it had met its IDEA obligations (*Endrew F. v. Douglas County School District*, 2015).

Andrew's parents brought the case to the Supreme Court because the district and Circuit courts used the *Board of Education of the Hendrick Hudson School District v. Rowley* (1982) case as a precedent and other Circuits were not using the same interpretation of FAPE. The courts used the *Rowley* two-part standard to explore whether the school district denied Andrew a FAPE. The district and Circuit courts ruled the school district provided adequate support for Andrew to make "some" progress per *Rowley*. The Circuit held if the district offered a promise of some educational benefit, it met its IDEA obligation of FAPE. The Supreme Court ruling in favor of the parents illustrated the fact that they were the driving force behind the adjustment to FAPE, challenging how the Court and school districts defined "some" progress. Because of Andrew's parents, all Circuits must use *Endrew* when defining FAPE.

Throughout the history of special education, parent advocacy and involvement has been critical to the development of special education services (Yell, 2019). Federal policies around parental involvement began when the Education for All Handicapped Children's Act (EAHCA) of 1975, Public Law 94-142 (amended in 1997 as IDEA) required school personnel to collaborate with parents to develop a program individually designed to meet the needs of SWD (Yell & Bateman, 2019; Senate Report, 1975). Prior to *Endrew*, FAPE's definition remained unchanged since its passage in 1975 (Yell & Bateman, 2017). For SWD to receive an appropriate education, the U.S. Department of Education provided federal financial aid to states submitting plans that all eligible SWD would receive a FAPE (Yell, 2016). States who accepted the funding, which is

all of them, could no longer exclude SWD or risk losing the federal funding. Additionally, FAPE was to be individualized for each SWD with an IEP developed by school personnel and parents (Yell & Bateman, 2017). Procedural violations regarding FAPE included “failing to meaningfully involve a student’s parents” (Yell & Bateman, 2019, p. 10). In 2006, Congress even emphasized the role of parents when developing the IEP in the finding and purposes section of IDEA.

Almost thirty years of research and experience has demonstrated that the education of children with disabilities can be made more effective by strengthening the role and responsibility of parents and ensuring . . . have meaningful opportunities to participate in the education of their children (20 U.S.C § 1400[c][5][B]).

Throughout the *Endrew* decision, there is mention of parent involvement. Justice Roberts wrote special education procedures “emphasize collaboration among parents and educators and require careful consideration of the child’s individual circumstances” (*Endrew*, 2017, p. 2). Additionally, he stated “judicial deference to school authorities will depend on their having provided parents in the IEP process with the opportunity to fully air their. . . opinion on the requisite degree of progress” (*Endrew*, 2017, p. 16). Yell (2019) concluded the Supreme Court recognized the importance of parental involvement in special education. Indeed, the Court assumes the ability of parents to be equal partners in the IEP process (Zimmer, 2018) and reiterates this standard in the *Endrew* case.

Weatherly and Yell (2017) also explained the importance of special education procedural requirements

emphasizing the mandate that parents are meaningfully involved in IEP development in a webinar designed for school administrators. They told administrators it is imperative school personnel monitor progress on IEP goals and when progress is not being made, the personnel and the student’s parents determine why the goals are not being met. The teacher should then make IEP changes after collaborating with the parents (Yell, 2019). Furthermore, Bateman (2017) wrote: “the most basic IEP requirement is that a student’s parents be full, equal, and meaningful participants in the development of their child’s IEP, along with school district personnel” (p. 87). The *Endrew* decision not only places greater accountability on schools but also on parents to be equal advocates for their child. As equal partners on the IEP team, parents need to understand the implications of a higher standard of FAPE to advocate for more than a minimal education during IEP meetings. To increase the standard of FAPE, parents will need a better understanding and commitment to work with educators to create a more rigorous and individualized IEP (Autin, Docherty, & Agoratus, 2018) to influence the development of their child.

Theoretical Framework

The theoretical underpinnings of this study are the Ecological Systems Theory (EST). According to Bronfenbrenner (1979), the development of children is impacted by their family and the surrounding world. Family, school, teachers, peers, health services, and neighborhood influence the development of the child the most because children experience face-to-face relationships with their immediate surroundings (Gestwicki, 2007). Guided by this theory, the researchers believe the more knowledgeable parents are about the

implications of *Endrew*, the better they can influence teachers and schools to ensure positive outcomes for their children. By providing an individualized FAPE, students with disabilities can make more substantial progress.

Methods

As a result of the focus on parental participation in IEP development, as noted in the *Endrew* case, a survey was conducted to explore parent knowledge and impact of *Endrew*. The research questions that guided the research were 1) What do parents of students with IEPs know about *Endrew*? and 2) What, if any, benefit has their child received as a result of *Endrew*? Using a mixed-methods approach, the researchers used a convenience sample with a single survey administration in the study, in which data were collected anonymously from across the United States (U.S.).

After Institutional Review Board (IRB) approval, a survey was developed and reviewed by experts in the field of special education. After validity was determined, the survey was distributed through a variety of Facebook pages and listservs including Kids with Asperger's Parent Group, Kids with Special Needs, and Autism Acceptance. The databases of several advocacy organizations were also used including TASH and the Peal Center. Purposive sampling was used to access a particular

group of people that had an attribute or trait needed in the study (Nardi, 2003). In this study, parents of students in grades PreK-12 with disabilities were targeted. Coverage error was addressed by utilizing the preexisting relationship between the researchers and TASH, UCF-CARD, and a parent member of various disability-related Facebook groups.

Population and Sample

According to the U.S. Department of Education (2018), the number of students with IEPs has risen to 6.8 million or 14 percent of total school enrollment. It is not known how many parents received the questionnaire because it was anonymous and shared on social media. As a result, the return rate was not calculated. All participants had a child in preschool - 12th grade with an IEP and consented to be in the study.

Demographics

Participants' demographics are a majority of the participants were female ($n = 92$, 98%), white ($n = 87$, 81%), between the ages of 40-49 ($n = 49$, 49%), had an income over \$100,000 ($n = 44$, 48%) and had a masters or doctorate degree ($n = 47$, 48%). Parents were asked for their zip codes. Figure 1 represents the location of participants.

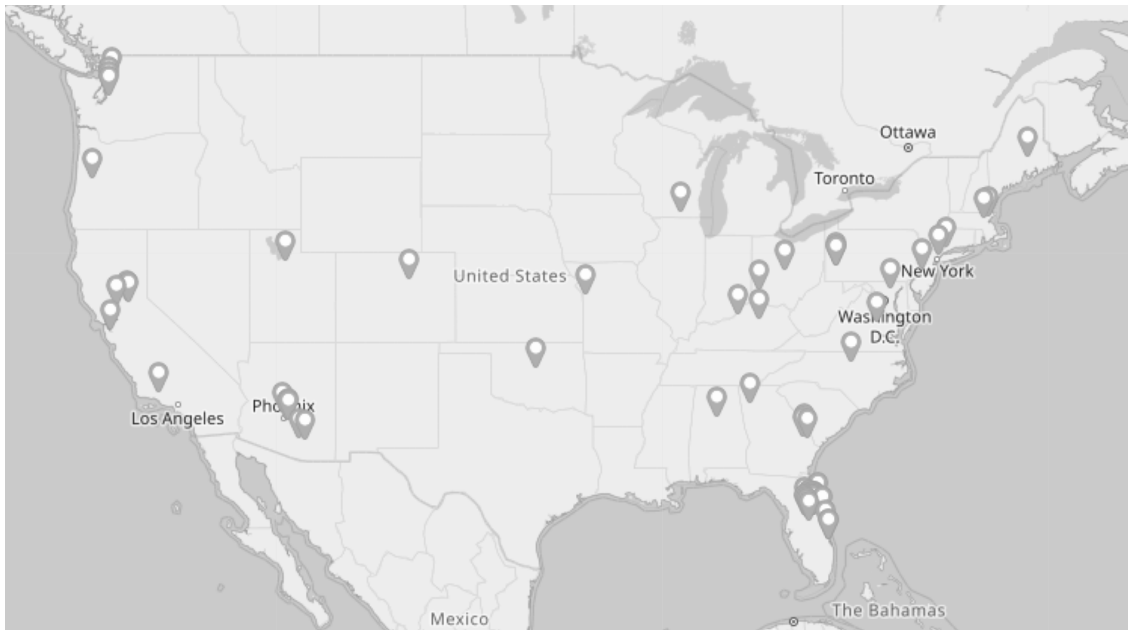


Figure 1. Location of Survey Participants by Zip Code created by author using Mapline (2019).

Participants from Florida ($n = 16$) represented 24 percent of the participants and the top two states (Florida and Arizona) represented 33 percent of the sample.

Instrument Development

The survey consisted of 18 questions. The authors drew from more than 20 years of collective experience in special education, special education law, and parent of a SWD. After the authors' review, the survey was examined by experts in the field of special education including special education lawyers from across the country. Two parents of an SWD pilot tested the survey and provided feedback on the clarity of the items and the time it took to complete the questionnaire. The IRB approved the revised survey and is available from the first author. The questionnaire was designed without advanced graphics, color, animation, or sound to produce higher response rates (Dillman, Tortora, Conradt, & Bowker, 1998).

Based on feedback from the experts, the primary predictor variables and constructs were identified as (a) parents of

SWD want to know about *Endrew* and (b) few have received benefits as a result of *Endrew*. Questions in the survey that represent the predictor variables are listed below (question one was a consent question):

What do parents know?

2. What is the extent of your knowledge of the *Endrew F.* Supreme Court Case?
3. If you have heard of *Endrew F.*, what do you know?
4. If a parent toolkit were offered to assist with IEP development, what information would you like to see in it?

What is the impact?

5. Since the *Endrew F.* decision in March 2017, have you noticed a change in your child's IEP meetings? The changes may be in procedures, attitudes, services, etc.
6. If yes, what type of changes have you noticed?

Several open-ended questions were used in the study where participants were asked to share what they know about *Endrew* and the type of changes noticed in IEP meetings

after *Endrew*. The incorporation of open-ended questions allows for the collection of readily quantifiable, richer data.

Data Analysis and Results

Research Question 1. "What do parents of students with IEPs know about *Endrew*?" The researchers analyzed the results of questionnaire items two, three, and four to respond to this research question using descriptive statistics and qualitative analysis. The subsequent open-ended questions solicited information on parental knowledge and what components they would like to see in an educational toolkit on the law and IEPs.

The sample size used in research question one was 108 which represents all the participants who answered the related survey questions. Survey question two collected parent responses on a four-point Likert type scale with one representing little to no knowledge and four having significant expertise. Parents who said they have "never heard of *Endrew* and want to know more" ($n = 57$) account for 57% of the participants. Parents who said they have "heard of *Endrew* and want to know more" ($n = 40$) accounted for 40% of the sample. Of the 108 participants, only eight said they were "experts and could teach others". One participant selected "other" and wrote, "I

have read about it and use it to guide my child's IEP."

Participants also responded to open-ended questions and conceptual categories emerged and lent to specific themes. Question three on the survey was an open-ended question asking what participants knew about *Endrew*. An array of 36 answers were given. The most frequent theme was "the school(s) must provide" and "minimum or minimal" as they were mentioned up to eight times. The next theme mentioned in up to seven responses was "Parents, Court case, education", and "progress" of SWD. Examples include "Schools must provide more than the bare minimum of an education for students with disabilities", "I think it relates to minimal standards", "the parents sued and won to get improved services for their child", and "not much".

Data from survey question four were analyzed by descriptive statistics and qualitatively for themes. Table 1 shows the frequency and percentage of participant response ($n = 108$) to survey question four: "If a parent toolkit were offered to assist with IEP development, what information would you like to see? Select all that apply."

Table 1
Answers to Survey Question 4

Answer	Response	Percentage of participants
Step by Step Directions	71	62%
My rights as a parent explained in everyday language	68	60%

How to negotiate for my child	77	67%
Other	14	13%

The responses of participants who typed in *other* were analyzed and the terms “complaint, rights”, and “data” were used by 14% of the participants who selected “other”. Examples include “Step by step what filing a complaint entails”, “Our rights as a parent in East to understand wording” and “How to combat schools faking data or not collecting data”.

Research Question 2. “What, if any, benefit have your children received as a result of *Endrew*?” This question was answered with survey questions five and six. Question five asked “Since the *Endrew F.* decision in March 2017, have you noticed a change in your child’s IEP meetings? The changes may be in procedures, attitude, services, etc.”. The participant sample for question five was 75 participants ($n = 75$). The results were only nine participants selected “yes” which was 12% and 66 selected “no” which was 88% of the sample. Consequently, almost 90% of the participants did not notice any changes in their child’s IEP meetings after *Endrew* in March, 2017.

Question six on the survey was “If yes, what type of changes have you noticed?” The results are represented by a sample of seven ($n = 7$). The most frequently written word was “IEP”. Examples include “more accommodating” and “Those running the meeting seem to go over all parts of the IEP and verify as we discuss it.”

Discussion and Implications

Guided by Bronfenbrenner’s Ecological Systems Theory (1979), the

researchers believe the more knowledgeable parents are about the proceedings and implications of *Endrew*, the better they can influence teachers and schools to assist in the development of their child with disabilities. Furthermore, parent participation is so vital to the IEP process, IDEA contains precise guidelines for school personnel to follow to ensure equal parent participation and make efforts to ensure parents understand the IEP process (Yell, 2019). Failure to follow guidelines could result in procedural violations. In *Endrew*, the U.S. Supreme Court affirmed the IDEA parent participation guidelines. Therefore, the current study attempted to determine the knowledge of parents of SWD and the impact of *Endrew* on their child’s IEP.

Two research questions; 1) What do parents of students with IEPs know about *Endrew*? and 2) What, if any, benefit has their children received as a result of *Endrew*? guided the work and a survey was created to solicit the needed data from across the U.S. To answer research question one, survey questions two through four were analyzed. Parents who said they never heard of *Endrew* and want to know more ($n = 57$) accounted for 57% of the participants. Parents who said they have heard of it and want to know more ($n = 40$) accounted for 40% of the sample. The results indicate 97% of the participants ($n = 97$) want to know more about *Endrew*. Involving parents in decision making is an important requirement of IDEA (Yell & Bateman, 2017). The effectiveness of the education for SWD depends on “strengthening the

role and responsibility of parents and ensuring that families of such children have meaningful opportunities to participate in the education of their children at school and at home” (IDEA Regulations, 34 C.F.R. § 1400 [c](5)(B)). The results of this survey show participants in this study want to be involved and know more about their rights post *Endrew*. As a result, districts should follow the recommendation of Yell and Bateman (2019) and ensure teachers are equipped with strategies and procedures to involve parents in programming decisions. Districts and advocacy organizations (i.e. Council for Exceptional Children; CEC, TASH, The Center for Autism and Related Disabilities; CARD, Council for Learning Disabilities; CLD, etc.) should meet this need and provide more information about *Endrew* and how it relates to every SWD’s IEP like the webinar Fisher and Ransom (2019) did for University of Central Florida Center for Autism and Related Disabilities (UCF-CARD) parents. The Supreme Court’s decision in *Endrew* will help parents make sure their SWD’s IEP goals lead to better outcomes (Autin, Docherty, & Agoratus, 2018). However, if parents do not know about the implications of *Endrew* on FAPE, they cannot be full participants on their child’s IEP team.

If participants responded that they heard about *Endrew* previously, they were then prompted to explain. The results were analyzed for the type of knowledge the parents indicated they had about *Endrew*. Even though eight of the parents indicated they had expert knowledge, only three stated the Case was about more than minimum standards indicating a considerable gap in the depth of knowledge of respondents.

An analysis of the results indicated several parents thought the Supreme Court

case was about tuition reimbursement which is only partially accurate. Endrew’s parents were eventually reimbursed their private school tuition and attorney’s fees after the case was remanded by the Supreme Court. However, the case is about much more than tuition reimbursement as it redefined FAPE for SWD in public schools.

Several participants indicated the case was about Endrew’s parents as plaintiffs. The use of the term plaintiff could indicate the higher level of income and educational level of the participants despite the inaccuracies of some of the responses. Many parents correctly indicated they knew *Endrew* was a ruling for more substantial services for SWD. Additionally, many of the participants knew *Endrew* upheld a law and there was a ruling to provide a better IEP. Further analyses of the qualitative data indicated most parents who had heard of *Endrew* knew districts must provide more substantial IEPs, which is the basis of FAPE. However very few of the respondents even mentioned FAPE despite some reporting high levels of income and expert knowledge about the case.

The last survey question developed to determine parent knowledge of *Endrew* was if a toolkit was developed what would they like to see in it. As noted in Table 1, over 62% selected “*step by step directions*”, 60% selected “my rights explained in everyday language”, and 67% selected “how to negotiate for my child”. These results indicate most participants need and desire more information about *Endrew* and the IEP process to be equal participants in the IEP meetings as required by IDEA. Parent participation is needed for parents to influence the school in the development of their child with a disability by providing a more substantial FAPE.

The largest percentage of participants indicated they would like “more information on how to negotiate for their child”. As a result, stakeholders (districts, advocacy groups, universities) should provide workshops, webinars, or toolkits on the best way to negotiate for services for SWD. The next largest percentage selected was “step by step directions”. These directions could be provided in a toolkit or booklet to parents to explain exactly what they should be doing for their SWD during eligibility, development of the initial IEPs, progress monitoring, evaluations, and annual IEP meetings. The lowest percentage (still most participants) selected they would like to know their rights explained in everyday language. As a result, districts should consider breaking down and chunking procedural safeguards so everyone can understand them and parents can be equal partners during IEP team meetings. If the parent feels the district is “faking or making up data” they would know what procedures to follow to make a state complaint.

The last response was “other” where 14 participants typed in responses. The statements were analyzed by determining keywords in the written text. “Experience” was mentioned by several parents, and even though most parents had graduate-level education, many did not feel they had the experience and expertise to properly advocate for their child. In fact, one parent asked for “a list of advocates” to be provided in a toolkit on *Andrew*.

One participant thought “providing examples of how to word accommodations so the school will follow them” should be provided in an *Andrew* toolkit. It is concerning the parent felt the school was not following accommodations because if he or she knew about procedural

safeguards as outlined by IDEA, the parent would know what to do if the school is not following accommodations as written by the IEP team.

Several parents who answered the question asked for “step by step directions” on how to file a complaint. This is concerning because it means the highly educated participants do not understand how to follow the procedural safeguards handed out at IEP meetings. Therefore, districts and advocacy organizations (CEC, TASH, CLD, etc.) should consider providing step by step directions and easy to read and follow procedural safeguards to all parents. Workshops and webinars about procedural safeguards should be developed.

Some parents indicated the IEP process is a negative experience. Districts need to follow the rules outlined in IDEA and emphasize parents as equal partners in addressing the individualized needs of the SWD. Evaluations need to focus on the “student’s disability, potential for growth, and the views of his or her parents” (Yell, 2019, p. 199) and focus on the strengths and needs of the child instead of his or her weaknesses. In fact, Chief Justice Roberts wrote a student’s IEP “is constructed only after careful consideration of the child’s present levels of achievement, disability, and potential for growth” (Endrew, 2017, p. 12). Additionally, IEPs should involve ambitious and challenging goals and objectives, because, according to the Supreme Court, “every child should have a chance to meet challenging objectives” (Endrew, 2017, p. 14). A student’s IEP should also include progress monitoring so his or her goals can be measured because a student’s “IEP must aim to enable the child to make progress” (Endrew, 2017, p. 11). If these conditions are met, it is likely that a student’s IEP will meet the substantive

requirements of a FAPE (Yell & Bateman, 2018). If parents are considered equal partners, they will be able to influence the development of the IEP and subsequently, their child.

To answer the second research question about any benefits their children has received as a result of *Andrew*, survey questions five and six were analyzed. Question five asked participants if they noticed a change in their children's IEP meetings. The responses were dichotomous with a "yes" or "no" response. Only 12% of the participants selected "yes" ($n = 9$). The result is almost 90% of the participants ($n = 66$) have not seen a difference in the IEP process since the *Andrew* proceedings in 2017.

Skip logic was used on Qualtrics and the participants who selected yes, were asked what types of changes they noticed. Only seven of the nine participants who selected "yes" wrote a comment. Those responses were analyzed and several key words emerged. The themes indicated the IEP teams were more "accommodating, specific, thorough" and "ground rules" were established and followed. Some of the nine participants felt "more like an equal partner in the IEP meeting", "the IEP was easier to understand", and "the IEP team was more thorough in their explanations". The last comment about "establishing and using ground rules to conduct the meeting" is

interesting. There was no indication in the response the parent was given equal say in the IEP but the better organization and staying on task in an IEP meeting is a good practice. It is more important, however, that the parents are given an equal say in the IEP and the team focuses on the individual needs of the child as determined by assessments and the present levels of performance as required by IDEA and reaffirmed in *Andrew*.

Another implication for the results of this study is the unique demographics of the participants. The demographics of the participants indicated 21% had an income over \$100,000 and 43% had advanced degrees (i.e. a master's degree or higher). High income and advanced degrees indicate many of the participants come from a higher social class than the general population. As a result, it is important to discuss the implications of the participant social class on the results of the study.

According to Amadeo (2019), the middle class has an income between \$41,119 and \$122,744. Families with incomes above \$122,744 are considered upper class. Based on this definition of social class, the participants in this study were examined by social class ($n = 93$) as shown in Table 2. The numbers are approximate since the survey questions did not align with Amadeo's (2019) definition of social class.

Table 2
Social Class of Participants Compared to the National Percentage

Class	<i>n</i>	% of participants	% of U.S. population*
Upper (> \$150,000)	20	22%	13%
Middle (\$50,000-\$150,000)	54	58%	45%
Lower (<\$50,000)	19	20%	42%

* Source: U.S. Census (2019). *Ages and sex: 2018*

When analyzing Table 2, it is important to note a majority (62%) of participants ($n = 74$) in the study come from upper and middle class households compared to the national average (58%) and the lower class is underrepresented ($n = 19$, 17%) versus 42% of the U.S. population. Education strongly influences parenting practices (Sherman & Harris, 2012). Parents who have high levels of education, like those found in this study, tend to focus on their children's educational success by forming relationships with educators (Schaub, 2010). Additionally, middle-class parents regularly intervene on

their children's behalf with authority figures and act as advocates in institutional settings (Sherman & Harris, 2012). As a result, it is not surprising the parents who responded to this survey want to know more about *Andrew* and the Case's implications on their child with a disability's educational programming.

It is also important to discuss the implications of the homogeneity of the sample in terms of race and gender. A summary of race is in Table 3 where the survey participants ($n = 107$) are compared to the U.S. average.

Table 3
Race of Survey Participants Compared to U.S.

Race	<i>n</i>	% of participants*	% of U.S. population**
White	87	81%	61%
Other (Black, Asian, etc.)	11	10%	39%
Hispanic	9	8%	18%

* percentage of participants who completed the survey

**Source: U.S. Census (2019). *Ages and sex: 2018*

Analysis of Table 3 indicated a lack of diversity in the participants of the survey compared to the U.S. population. Therefore, the results of this survey cannot

be generalized to different races and ethnicities. The lack of diversity was not expected and further research on the impact of *Andrew* should be conducted on

diverse races and ethnicities. Not only was there a lack of diversity in race, there was also a lack of diversity in gender as well. It is not surprising the sample consists of more females ($n = 92$) than males ($n = 2$) as some of the social media platforms where the survey was distributed were geared toward mothers. The lack of male input means the information gathered from the data cannot be generalized to fathers of SWD as the results of this survey does not consider the father or male knowledge of *Andrew*.

When analyzing Tables 2 and 3, it should be noted that a majority of participants of this study were white, female, and affluent. Thus, white wealthy mothers of SWD stated on the survey they want to know more about *Andrew* to better advocate for their SWD. In fact, question two on the survey asked the participants the extent of their knowledge about *Andrew* and 97% of the white, middle and upper class, educated, and female participants selected they wanted to know more about *Andrew*. Most indicated they had never heard of it. Consequently, the results suggest the seminal *Andrew* Case and the subsequent action of the courts regarding special education are not being disseminated to parents in a way that is both understandable and easy to transfer to the special education process. The lack of understanding could negatively impact students as parents serve as the primary advocate for their children. In addition, a large amount of literature focuses on the disenfranchisement of families of color and disproportionality in special education (Noltemeyer & McLoughlin, 2012; Artiles & Bal, 2008; Kaufman, 2004). If knowledge is not reaching communities who wield social capital, wealth, and status, then certainly a

concern should be raised on how information reaches other communities.

In summary, an IEP team must determine what constitutes an individualized and appropriate education for each SWD. According to IDEA, parents must be an involved member of the team (Yell, 2019). With the passage of *Andrew*, the standard of FAPE has changed. Most of the participants in this study were highly educated with advanced degrees and over 97% wanted to know more about *Andrew*. Most participants do not understand the changes *Andrew* brought about and desire more information about it. Most participants have not noticed any changes in their child's IEP meetings since *Andrew*. As a result, the implications are districts, universities and advocacy organizations should provide more parent training on FAPE and *Andrew* to help parents be informed members of the IEP team. Effective parental participation requires substantial knowledge and the ability to use that knowledge to negotiate for the SWD (Disability Rights Ohio, 2014). The results of this study indicated parents need and desire information about *Andrew*, FAPE, and IDEA procedural requirements in a language they understand. With the knowledge, parents can be empowered to make educated decisions regarding the quality, quantity, and types of special education and related services offered to their SWD and have more influence on the development of their child within their ecosystem.

Limitations

As with any study, limitations arise that affect the outcome of the research. The number of students with IEPs in the U.S. is 6.7 million in every state (U.S. Department of Education, 2017), however, the survey only had 111 participants representing 20 states. Of the 111

participants, some did not answer all the questions. There was concentration geographically in the Southeast, possibly due to the geographic location of the researchers as a little over a quarter of the participants were from Florida.

Most of the participants in the study had advanced degrees ($n = 48$), income over \$100,000 ($n = 24$) and were predominantly white ($n = 87$) females ($n = 92$). High income and advanced degrees indicate many of the participants come from a higher social class than the general population. As a result, the responses to the survey questions do not represent the population of the U.S. Furthermore, since the survey was distributed online, some populations may have been missed. The sample only represented those who participate in Facebook groups and who read listservs from several advocacy groups. Parents who do not use social media or belong to the advocacy groups were not included in the study.

Most of the data in this study were collected using a researcher created survey instrument. Findings are based on the assumptions the participants responded honestly and interpreted the instrument as intended. A voluntary survey tends to attract participants who feel strongly one way or another with no analysis of non-responders which contributed to the sampling bias. For these reasons, the results are considered exploratory and caution should be taken in generalizing to a larger population.

Future Research

While the demographics of the participants were listed as a limitation, it provides an opportunity to generate future research. Indeed, the participants in this study were primarily highly educated, white, mothers of SWD, however, this builds the need to investigate the impact of *Andrew F.* on different socioeconomic, racial and gender groups. If highly educated, upper and middle class, white women want to know more about *Andrew*, what are the implications of groups of people who lack the access and resources to advocate for their child? The current study should be replicated using a more diverse and larger participant base to examine the needs of all parents of SWD.

The current data can be analyzed to determine the responses by geographic location or by disability status. Future research could also explore ways in which parents feel information of this nature could be disseminated to parents. Research could focus on membership of advocacy organizations and their roles in educating parents about *Andrew* and other federal and state laws that directly impact students with disabilities. Lastly, interviews could be conducted to determine the parent perception of influence over the educational development and programming of their SWD.

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