

**Policy 2800 – Regulations for the Education of Juveniles Placed in Secure Predispositional Juvenile Centers  
July 13 – August 13, 2012**

Action                      Type  
 N: No Response            - Negative  
 NA: Not Accepted        + Positive  
 A: Accepted                o Neutral

Date	Individual/Organization	Comments	Action/ Type	Rationale
8/9/12	Melanie Hummel Transition Specialist Wheeling, WV	<p><b>Section 126-69-2 Purpose</b> The proposed regulations are good in theory, but may be impossible to accomplish in practice do to the nature of the juvenile centers' population (ie students are usually only at the centers for a very short time, and the centers do not usually have a large education staff). The transitions specialists are being given a lot of responsibility when most are only part-time employees.</p> <p><b>Section 126-69-5 Curriculum and Instruction</b> This section does not provide enough clear direction for the staff at the Juvenile Centers! Who will be responsible for writing the individualized education plans for non-special education students? Will transition specialists be responsible for the "goals for transition" and the "recommendations for future education endeavors" sections of these individualized education plans? If they are not responsible then are they still responsible for making sure that the plan written by someone else is implemented?</p>	NA	

Most transition specialist are only part time and spend a lot of time on the rode.....There just aren't enough hours in the week for to do this for every student who walks through the juvenile center's door (especially those here for short periods of time). How long should a student be at the juvenile education center before an individualized education plan is written (i.e. is there a timeline?) What about students who comen and go in less than a week? WHat will the individualized education plans look like? will they be the same as an IEP for special education students?? Who will decide what goes into these plans?

**Section 126-69-16 Monitoring**

I am commenting on 126-69-16 Cooperation from County School Districts and RESAS (NOT Monitoring):mmm What authority do transition specialists have to decide what is appropriate justification for alternative placement? What if the transition specialist does not agree with the alternative placement? Does this set up a confrontational relationship between transition specialist and the school systems that we are trying to work with to transition students back to? What about the detention centers that do not have a transition specialist on staff? Also, "develop a plan of transition, support and integration at the receiving school to assure optimum conditions into public school. This plan shall be developed by counselor, administration, and/or parents and

NA

		<p>transition specialists" If part-time transition specialists are traveling to schools and participating in meetings, are they also going to be responsible for developing the transition goals for the individ. ed. plans? What if the schools do not invite the transition specialist to these meetings? What if a student is only at the juvenile center and thus out of school for a week, do we still develop a plan for him or her?</p>		

**Rhonda Mahan**

---

**From:** Nobody <nobody@kryten.wvnet.edu>  
**Sent:** Thursday, August 09, 2012 1:18 PM  
**To:** rmahan@access.k12.wv.us  
**Subject:** Comment Received for Policy 2800 (2012-08-09 13:17:43)

Please save this email in a "Comments Received Online" folder.  
Your folder will be a backup. All comments are saved in our database.  
The Complete Comments Report from the database can be found here:  
<http://wvde.state.wv.us/r.html?id=b16bea313b513705d5e94362f85f569a>  
This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2800

#####

Name: Melanie Hummel  
Organization: WVDE, Office of Optional Education Pathways  
Title: Transition Specialist  
City/State: Wheeling, WV  
Role: Professional Support  
Posted: 2012-08-09 13:17:43  
Posted from IP:

Comments for section 126-69-2 Purpose

---

The proposed regulations are good in theory, but may be impossible to accomplish in practice do to the nature of the juvenile centers' population (ie students are usually only at the centers for a very short time, and the centers do not usually have a large education staff). The transitions specialists are being given a lot of responsibility when most are only part-time employees.

Comments for section 126-69-5 Curriculum and Instruction

---

This section does not provide enough clear direction for the staff at the Juvenile Centers! Who will be responsible for writing the individualized education plans for non-special education students? Will transition specialists be responsible for the "goals for transition" and the "recommendations for future education endeavors" sections of these individualized education plans? If they are not responsible then are they still responsible for making sure that the plan written by someone else is implemented? Most transition specialist are only part time and spend a lot of time on the rode.....There just aren't enough hours in the week for to do this for every student who walks through the juvenile center's door (especially those here for short periods of time). How long should a student be at the juvenile education center before a individualized education plan is written (i.e. is there a timeline?) What about students who comen and go in less than a week? WHat will the individualized education plans look like? will they be the same as an IEP for special education students?? Who will decide what goes into these plans?

Comments for section 126-69-16 Monitoring

---

I am commenting on 126-69-16 Cooperation from County School Districts and RESAS (NOT Monitoring):rnrnWhat authority do transition specialists have to decide what is appropriate justification for alternative placement? What if the transition specialist does not agree with the alternative placement? Does this set up a confrontational relationship

between transition specialist and the school systems that we are trying to work with to transition students back to? What about the detention centers that do not have a transition specialist on staff? Also, "develop a plan of transition, support and integration at the receiving school to assure optimum conditions into public school. This plan shall be developed by counselor, administration, and/or parents and transition specialists" If part-time transition specialists are traveling to schools and participating in meetings, are they also going to be responsible for developing the transition goals for the individ. ed. plans? What!

What if the schools do not invite the transition specialist to these meetings? What if a student is only at the juvenile center and thus out of school for a week, do we still develop a plan for him or her?