



Can IEP goal be recycled? Reveal right answer after asking 4 on-point questions

As the end of the school year approaches, IEP teams may feel like they are drowning in annual evaluations and meetings. This feeling of being swamped can lead to the repetition of a student's IEP goal from year to year.

"Reusing or repeating [IEP goals](#) year after year without meaningful revision or justification may indicate a lack of individualized planning or progress, which are signs the child may not be receiving a FAPE," said Jennifer Baldassari, an attorney at Lozano Smith in Walnut Creek, Calif.

IEP goals should not be repeated for the sake of the team's convenience. IEP academic and functional goals are designed to meet a student's disability related needs and enable him to make progress in the general education curriculum. [34 CFR 300.320](#) (a)(2)(i). See also *Endrew F. v. Douglas County Sch. Dist. RE-1*, [69 IDELR 174](#) (U.S. 2017).

Have the IEP team answer the following four questions to decide whether repeating a student's IEP goal may or may not be necessary to ensure her access [FAPE](#).

1. Has student progressed toward goal where skill remains critical?

"If a student makes no progress on a goal, but the skill remains critical, repeating the goal may be appropriate only after the IEP team has met to analyze the lack of progress and adjust supports accordingly," said Baldassari. Supports can look like providing a social story prior to the student's group interaction or further [scaffolding](#), she said. IEP teams can incorporate these supports in goals by starting the goal with the support, for example, "With scaffolding support, Tommy will ...," Baldassari said. Should the student transfer to another school, writing the supports with the goal would enable other school districts to implement the goal with the correct supports in place, she added.

It's important to note that "The LEA should not wait until the annual meeting to respond to concerns around IEP goal progress," said Baldassari. IEPs must be reviewed at least

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annually. [34 CFR 300.324](#)(b)(i). "However, if a student is not making expected progress, the IEP must be revised sooner," she said. Progress monitoring data should guide decisions to adjust or replace the student's goal at an earlier meeting held before the annual meeting, she added.

2. Have student's supports, services been interrupted?

If a student experiences a circumstance that interrupts or prevents the student from receiving the necessary services to fully address his goal, then the IEP team may need to repeat the student's goal, Baldassari said. "The most common examples I have seen are extended absences from school, natural disasters like fires, or out-of-district hospitalization," she added.

3. Has student made progress without meeting goal?

"If the student made progress but has not yet met the goal, the team may continue targeting the skill but should revise the goal to reflect the student's current level and trajectory, rather than copying it verbatim," Baldassari said. "Goals need to be appropriately ambitious." See *Edward M.R. v. District of Columbia*, [125 LRP 4880](#) (D.C. Cir. 02/14/25)(The fact that a student's IEPs repeated some goals did not render the IEPs' design fatally flawed, especially given that his memory deficits made repetition important.).

Baldassari said districts should be analyzing the student's progress on the IEP goal. When measuring progress, look at whether it's de minimis. In other words, question whether the student has made significant strides toward mastery of the goal, she said. If a student's goal is to make three-word utterances, progress without mastering that goal can look like conquering a second word and attempting to utter a third word, she said

4. Has district continued goal for struggling student without review?

"If a student is struggling to meet a goal, and the district continues it without reviewing whether the goal is appropriate, adjusting instruction, or addressing prerequisite skills, this may reflect a failure to provide an individualized program," Baldassari said. Despite

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the student's difficulty meeting his goal, teams must refrain from repeating or reusing the student's same IEP goal without careful review to avoid violating procedural and substantive compliance measures, she added.

Bonus tip: Train staff for IEP compliance

Implement frequent or annual trainings for IEP teams, California attorney Jennifer Baldassari said. Ensure training covers how to recognize the warning signs of a student's lack of progress in IEP goals and how to write effective goals that are measurable and objective. Measuring a student's progress is crucial in determining whether to reuse an IEP goal. As a result, teams must write effective goals for those to understand the student's progress in the past and present along with determining his future direction.

May 15, 2025

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