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Special Education Review

Greenwich Public Schools

Executive Summary

June 2021

PUBLIC CONSULTING GROUP

I. Purpose of the Study and Methodology

Purpose of the Study

In October 2020, through a competitive bidding process, Greenwich Public Schools (GPS) selected Public Consulting Group (PCG) to conduct an independent review of its special education services. This report describes the current state of the special education program in GPS and is designed to guide the District toward continuous improvement. It builds upon previous special education evaluations in GPS and focuses on the current, overall effectiveness of this program as well as the progress made toward recommendations from prior evaluations.

The study examined the following guiding questions:

1. How is the District's continuum of services organized to support a Free and Appropriate Education (FAPE), and to what extent is GPS meeting compliance and data collection requirements?

2. How are funds budgeted, and what are the major cost drivers? Does GPS allocate resources in a way that facilitates maximum return on District investment?

3. To what extent does GPS organize and utilize its human capital resources to provide adequate services for students with disabilities to support and maximize student learning outcomes?

4. To what extent does GPS employ inclusive practices and implement instructional practices that focus on improving academic, functional, and post-secondary outcomes for students with disabilities?

5. How does GPS support the unique learning needs of struggling students through its tiered system of support?

The recommendations in this report focus on priority areas that emerged from the data collection and include action steps to bolster overall planning in support of increased access for students with disabilities to high-quality instructional programming.

PCG worked in conjunction with an appointed Steering Committee to manage this engagement. The Steering Committee consisted of the Superintendent, two Board of Education Members, and two parent representatives. Two other GPS staff members, appointed by the Superintendent, provided logistical support and assistance with gathering requested data and documents. In adherence with GPS's request for an independent review, at no point in time did PCG share preliminary findings, analyzed data, or report drafts with GPS staff members, Board Members, Steering Committee Members, or any others outside of those employed by PCG.

Methodology

Over the course of the 2020-21 school year, PCG conducted a mixed-methods study of the special education program in GPS. The findings and recommendations related to programs, policies, and practices resulted from a comprehensive analysis of several data sources. Sources included 1) Data and Document Analysis, 2) Focus Groups and Interviews, 3) Student File Review Focus Groups, 4) Classroom Visits, and 5) Staff and Parent Surveys. These components drew from Research and Practice Literature to inform the findings and recommendations. PCG used publicly available achievement and financial information to compare key GPS statistics against local district, state, and national data. The method and sources of data are triangulated to increase the validity of the conclusions, in this case, regarding program implementation, identification of gaps, and recommendations for the continued improvement of GPS's special education programs and services.

This engagement occurred during the COVID-19 pandemic when a combination of hybrid and in-person learning occurred. Despite the complexities of conducting this review virtually, GPS was committed to the process and worked with PCG to ensure data collection methods were reliable and appropriate given the remote context. The GPS leadership should be recognized for their response to this crisis, as well as maintaining ongoing collaborative engagement with PCG for the purposes of continuing this review.

II. District Context

Greenwich is a town in southwestern Fairfield County, Connecticut, United States. As of the 2010 census, the town had a total population of 61,198, with a census-estimated increase to 62,840 in 2019.[1] The largest town on Connecticut's "Gold Coast," Greenwich is home to many hedge funds and other financial service firms, given its proximity to New York City. Its school district, Greenwich Public Schools (GPS), educates approximately 9,000 students from kindergarten through age 21.[2] The District serves students in 15 schools: 11 neighborhood elementary schools (grades K-5), three middle schools (grades 6-8), and one high school (grades 9-12+). Students are assigned to elementary and middle schools based on residential attendance areas. Four of the elementary schools and one middle school also serve as magnet schools, offering programmatic choice for families.[3] A tuition and lottery-based preschool program, inclusive of students with disabilities, is also offered for residents and employees of the Town of Greenwich. Additionally, GPS operates an alternative high school program, Windrose, for students requiring a smaller learning environment, more structure and support, and a path toward graduation when they are over-age and under-credit.[4] The student body is largely white (60.9 percent), with students primarily coming from economically advantaged backgrounds. The diversity in the community should not be overlooked, though. Hispanic/Latino students represent 22.3 percent of the student population, Asian students 8.7 percent, multiracial students 5.6 percent, and Black students 2.3 percent.[5] English learners (EL) represent 4.0 percent of the student population, and 12.9 percent of students receive special education services.[6] Nearly 22 percent of enrolled students are economically disadvantaged. Honoring the racial, economic, academic, and neurological diversity of its students is critical for GPS's future.

GPS's reputation is that of a high-performing district, with several award-winning schools and accolades for its programming. Its culture is one built on the notion of continuous improvement and high expectations. As evidenced by the multiple program reviews that have occurred in special education and in other programmatic areas, GPS is accustomed to analysis and reflection. Resulting action and changes in practice, however, have been slow to come. The Planning and Placement Team (PPT) process, communications and engagement, the continuum of services, and professional development have been identified as areas of concern in all external special education reports dating back to 1997. The Greenwich parent community is active and vocal, providing significant input on what they believe the direction of special education in GPS should be. Many parents shared with us their hope that this report would be upfront and honest, even if the areas of improvement outweighed the strengths. There is a sense of cautious optimism in the parent and school communities that the recommendations in this report will be enacted immediately and with fidelity. Some remained conflicted about GPS's ability to change, and others recognized the heavy

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[1] https://www.census.gov/quickfacts/greenwichtownfairfieldcountyconnecticut
[2] http://edsight.ct.gov/SASStoredProcess/guest?_program=/CTDOE/EdSight/Release/Reporting/Public/Reports/StoredProcesses/ConnecticutReportCard&_district=Greenwich+School+District&_school=+&_select=Submit
[3] Hamilton Avenue School, The International School at Dundee, Julian Curtiss School, New Lebanon School, and Western Middle School
[4] https://www.greenwichschools.org/greenwich-high-school/academics/teaching-learning/windrose
[5] http://edsight.ct.gov/SASStoredProcess/guest?_program=/CTDOE/EdSight/Release/Reporting/Public/Reports/StoredProcesses/ConnecticutReportCard&_district=Greenwich+School+District&_school=+&_select=Submit
[6] These data are from the GPS website. Figures in the report differ, depending on various factors.

lift that is likely ahead. As one stakeholder shared, "This is an 'open the aperture' report. It won't give us easy answers but will guide us on how to make decisions about special education in the future."

GPS has the opportunity to change its current trajectory, build a world-class special education program, facilitate trusting relationships with parents, and offer supports and services that enable students with disabilities to excel academically, socially, and emotionally. The current District leadership and Board of Education have publicly expressed commitment to making the changes necessary. The start of a new interim Chief of Pupil Personnel Services, coupled with a focus on improving the foundation of intervention supports through a Multi-Tiered System of Supports (MTSS) framework, reflects the beginning of necessary shifts. With a sense of urgency and an unrelenting commitment to enacting the recommendations in this report, PCG believes GPS can achieve the high-quality programming for ALL students, especially those with disabilities, that we know it desires. Initiating this kind of change requires attention, a strong vision from the Superintendent and Board of Education that is enacted by senior leadership staff, an appropriate allocation of resources, mandated professional learning, and clear, non-negotiable accountability measures. PCG strongly encourages GPS to develop a bold, creative, and transparent implementation plan to which it will hold itself accountable, and that is informed by input from a wide range of community stakeholders. Doing so will position GPS for its upward trajectory for years to come.

III. Summary of Strengths and Opportunities for Improvement

The following section highlights the strengths and opportunities for improvement in each area reviewed as part of this evaluation.

District Context and Demographics

Strengths	Opportunities for Improvement
• **High performing.** GPS has a reputation for having high-quality schools and programs. • **Organizational support**. The Board of Education and District leadership are committed to changing special education practices. • **Results Driven Accountability (RDA) determination.** GPS received an RDA determination of "Meets Requirements" from the Connecticut Department of Education.	• **Common deficiencies.** Four deficiencies - the Planning and Placement Team (PPT) Process, Communications and Engagement, Continuum of Services, and Professional Development - were identified in prior special education reports as areas in need of improvement. • **Identification practices.** Hispanic and Black/African American students were more likely to be identified with specific disabilities, and a greater number of students with IEPs were economically disadvantaged compared to the general GPS population.

Summary and Implications

The four deficiencies – the PPT process, communications and engagement, continuum of services, and professional development – identified in the prior five external special education reports spanning 24 years continue to hinder GPS's special education program. The implications of this are significant and far-reaching – the department's inertia to act with urgency on these matters has further seeded mistrust among parents and staff. And, more importantly, these shortcomings have served as impediments to supporting the needs of the District's students with disabilities. As GPS charts a new course and builds upon its reputation as a top performing school district, attention should be paid to data trends that, if not corrected, could continue to create obstacles for equitable access to a high-quality education among subgroups of students. Specifically, Hispanic students were four times more likely to be identified with an intellectual disability and two times more likely to be identified with a speech/language impairment. Black or African American students were twice as likely to be identified as having an emotional disability, other health impairment, or specific learning disability. Of students with an IEP, 32.4 percent were economically disadvantaged compared to 19.0 percent of students without an IEP yet only 30.3 percent of children enrolled in early childhood were identified compared to the larger rate of 38.7 percent of unidentified children. Conducting evaluations through a culturally competent lens and improving outreach for families with children likely to be eligible for free and reduced lunch will be required focus areas.

Special Education Services

Strengths	Opportunities for Improvement
• **Educator commitment**. The District has committed educators (teachers, paraprofessionals, related service providers) dedicated to supporting students with IEPs. • **Pre-K performance data**. GPS's Pre-K special outcomes data in the State Performance Plan/Annual Performance Report (SPP/APR) show positive and sustained student outcomes. • **Progress reporting**. IEP progress reports often include quantifiable data indicating student progress. • **Shared beliefs among many teachers about supporting special education students**. Many teachers across the District shared a wholehearted belief that students with disabilities are their students.	• **Multi-Tiered System of Supports**. There is inconsistent use of an MTSS framework to support struggling learners or special education referral data and conflicting beliefs on how the process can potentially support the needs of struggling students who may be identified in the future as students with disabilities. • **IEP/PPT process**. The process lacks consistency across the District because staff feel they receive conflicting messages from the PPS Office and inconsistently apply procedures in the Red Book. • **Parental frustrations about process**. Parents experience frustration with the PPT process specifically around trust, collaboration, information sharing, and adherence to timelines. • **Achievement gap**. Achievement gaps have plateaued between GPS students with disabilities and typically developing peers. • **Resource support**. District offers resource support for students as determined by PPT; however, there are inconsistent specialized supports for students with low incidence disabilities with unique learning needs (e.g., autism). • **Deficiencies with the continuum of services**. By engaging in an unofficial policy of not "labeling" through programming, students with unique learning needs may not be getting access to learning supports and strategies specific to characteristics with their disability. • **Classes that are inclusion in name only**. Classes in the middle and high schools where the majority of students have IEPs and 504 Plans are taught by general education teachers have limited special education supports. • **Limited or non-existent co-teaching**. Co-teaching only occurs at the middle school level in select classes and does not exist in the elementary schools and high school. • **Collaborative teaching model**. GPS engages in a form of collaborative teaching in the middle schools and high school known as Academic Lab; however, partnerships between general education and special

	education teachers are weak, not specific to the instruction occurring in the moment, and are reactionary to supporting the student after they are showing an academic issue.

Summary and Implications

Although the District has been notably compliant by reports produced by Connecticut for the State Performance Plan and Annual Performance Report, there is much more worthy of consideration. GPS' PPS Office has been operating under the same leadership for the past several decades. During that time, the Individuals with Disabilities Education Act (IDEA) has been reauthorized twice by the U.S. Congress, and countless special education regulation changes have occurred in Connecticut in response to these reauthorizations. Yet, in many respects, GPS' special education program continues to operate much like one may have in 1997 – a time when inclusion was still ambiguous, co-teaching was not the norm, specialized supports for low incidence disabilities (e.g., autism) were lacking unless the student was sent out of district, and arcane words were part of the vernacular to describe a student (e.g., "more comprehensive," "mildly comprehensive").

Under the present structure in GPS, some of its most pressing challenges include the following:

- An IEP/PPT process that lacks consistency across the District because staff feel they receive conflicting messages from the PPS Office. In addition, the District has a standard operating procedures guide known as the Red Book that is not used consistently by staff.

- Parental frustrations and overwhelming distrust regarding the PPT process.

- Inconsistent use of MTSS to assist struggling learners or inform the special education referral process. Conflicting and sometimes misconstrued beliefs on how MTSS can potentially support the needs of students who may be identified in the future as students with disabilities.

- Lingering achievement gaps that have plateaued between GPS students with disabilities and nondisabled peers.

- Use of "collaborative classroom" or "resource" special education that are not organized to meet all needs of students with IEPs, and inconsistent specialized supports for students with low incidence disabilities with unique learning needs (e.g., autism).

- By engaging in an unofficial policy of not "labeling" through programming, students with unique learning needs may not be getting access to learning supports and strategies specific to their disability.

- Classes that are inclusionary in name only. Classes in the middle schools and high school where the majority of students have IEPs and 504 plans yet they are taught by general education teachers with limited special education supports.

- Limited co-teaching that occurs at the middle school level only in select classes. It does not exist for elementary schools and high school.

- A collaborative teaching model that is not supported by research in the middle schools and high school known as Academic Lab, where partnerships between general education and special education teachers are not specific to the instruction taking place in the moment and are reactionary in supporting students after academic difficulties have already occurred.

- A belief by some building administrators that the present structure should not change. A fixed mindset is fostered by instruction that is inclusive in name only, where building administrators are not supportive of co-teaching, and a belief by some building administrators that the present structure should not change.

Undertaking reformation of these areas will be critical to the overall success of GPS' special education program. Embarking on these changes will not occur overnight and will require the leadership and fortitude of the District's Board of Education, Superintendent, Deputy Superintendent, new Interim Chief of PPS, and school staff.

Support for Teaching and Learning

Strengths	Opportunities for Improvement
• **Superintendent**. The Superintendent is trusted and seen as an advocate for families and students. • **Organizational commitment**. There is an organizational commitment to improving special education. • **Special education leader.** GPS will have the opportunity to create a new vision in special education given the start of a new Chief of Pupil Personnel Services. • **Evolve**. The District will no longer use Evolve in the budgeting process. • **Parent handbook**. There is a parent handbook available on the District's website. • **Staffing ratios**. GPS is well-resourced with special education teachers, instructional assistants, nurses, psychologists, and speech therapists.	• **Procedure guide.** The Red Book is not user-friendly or consistently known by staff, needs to be updated regularly, and should be streamlined for easier access to information. • **Strategic plan**. Data from the current strategic plan show the continued need to improve stakeholder satisfaction. • **Pupil Personnel Services**. The PPS department structure is unclear, and the office name is not inclusive of its function. • **Special education staffing model**. The current special education staffing model is not well understood or transparent. • **Out of District (OOD) placement data.** OOD student data and agreements are not routinely tracked or monitored against financial data.

Summary and Implications

Having a strong operational infrastructure is critical to ensuring school districts can meet their vision of providing high-quality programming. This means that schools have appropriate central office support for problem solving, transportation processes are sound and busses run on time, resource allocations align to meet student need, and teachers are supported with professional learning for continuous improvement. If any of these are weak or missing from the way districts and schools lead, they are putting their entire commitment to their mission and vision at risk. As such, GPS will need to place an equal emphasis on shoring up certain operational supports as it does on instructional practices to help develop a thriving special education program.

Under the current structure, the PPS Office operates with a lean staff to meet its objectives. The organizational structure appears to be primarily supporting processes, procedures, and compliance district-wide, with programmatic initiatives and instructional support for differentiated instruction being initiated and implemented at the school level. Given this model, the PPS Office is not currently structured to provide instructional support or best practices to schools. Further, the culture of the department needs revamping, with a strong orientation toward collaboration with parents and school staff in the future. Further clarity is needed around the focus of the office. Changing the office name to Specialized Instruction and Services, for example, could help rebrand and set a new course. In addition, the new name would clarify its focus as embracing both special education and support services. Over the course of the next school year, GPS will have an interim Chief. This change provides GPS an opportunity to establish a strategic direction for the office and optimize its organizational structure to support strategic initiatives.

While other school districts have struggled with decreasing budgets over the years, GPS has benefitted from relatively consistent funding from the town and low staffing ratios – compared to other districts nationally based on available data - for special education teachers, instructional assistants, nurses, speech therapists, and psychologists. However, the per student dollar amount for students with disabilities has decreased over the past several years, and the commitment of funds to out of district placements has continued to escalate. Nationally, there is no consensus on the ideal student to teacher ratio for supporting students with disabilities, primarily because staffing decisions should be made based on programmatic and instructional priorities and the supports required for providing students an appropriate education. Staffing should be a byproduct of a district's instructional model, not the driver of it. Dissolving the use of Evolve and committing to developing a new, transparent staffing model are steps in the right direction. GPS will first need to re-imagine how it provides instruction and support services for students with disabilities, centering them on providing meaningful access to grade-level curriculum, before developing a new allocation model. As part of this development, the District should engage in outreach to parents and PPT teams of students who are in out of district placements to better understand what was missing from GPS schools that they pursued this avenue.

Creating additional user-friendly procedural guides for staff and parents and delineating necessary transportation protocols will allow GPS to set expectations and establish standards of practice for how schools provide special education instruction and support services and what parents can expect. Providing professional learning opportunities for school staff on these revised procedures, as well as access to additional job-specific trainings and job-embedded coaching, will be critical.

Parent Engagement

Strengths	Opportunities for Improvement
Engaged parents. PTA Council's Special Education Supports and Twice Exceptional (2E) Committees and the Greenwich Special Education Advisory Council (SEAC) are active partners in the GPS's special education initiatives and serve as strong advocates for students and their families. **Communication outreach.** GPS is committed to providing accurate and timely information to the community via various means, including the Superintendent's Friday email. **Competent, caring staff**. Parents feel that GPS staff are knowledgeable, generally work in the best interest of the child, and are responsive.	**Communication.** Parents would like more routine communication from school staff about their children's progress or challenges they face. **Pace of change.** Parents see limited change in the delivery of services to address their concerns over many years. **Limited trust.** There is an undercurrent of mistrust that parents have of the PPS Office. **Advocacy and equity**. Parents report having to strongly advocate for an evaluation and/or services they believe their child needs. Those who do so are believed to have greater access to services.

Summary and Implications

Under the current Superintendent's leadership, outreach, and communication from GPS to support families of children with disabilities has continued to develop. Parents acknowledge improvement in GPS's efforts to keep them informed. GPS's parent organizations, Greenwich SEAC and the PTA Council's SES and 2E committees, are engaged partners and want to be part of the solution. They provide families with information, resources, and an outlet to share their voice in GPS. Training and information sessions they conduct, as well as ones that GPS has offered in the past, are perceived of as helpful but parent awareness of these opportunities is uneven, especially when they are driven at the school level.

GPS will need to develop a comprehensive plan focused on family engagement for parents of children receiving special education. This starts with setting a new, welcoming tone in the PPS Office and developing more forums for idea sharing, problem solving and support, improving responsiveness to concerns, and increasing training and materials available to parents. Quicky enacting the recommendations in this report will demonstrate that the District is committed to the improvements parents have long sought.

III. Recommendations

PCG saw ample evidence that GPS has a solid foundation on which to build. GPS has many notable strengths, including its passionate and knowledgeable staff and its willingness to undertake this review and act on the recommendations as part of a continuous improvement cycle.

The following recommendations are considered priority recommendations. Each are interrelated and will require a significant investment on the part of GPS to undertake. Implementation of these recommendations will set the foundation for all other action steps that emerge from this report. The action steps listed under each recommendation below are organized in a manner that provides a comprehensive view of the activities required to initiate change. Although components of the action steps can be implemented within a shorter timeframe, full-scale implementation of the recommendations may take three-to-five years.

PCG has mapped the recommendations in this report to its Special Education Effectiveness Domains. Action steps corresponding to the recommendations are included below.

Domains	Recommendations
Learning Environment and Specialized Services Delivering instruction and interventions within an inclusionary framework and with IEP fidelity, leading to increased access and progress in grade-level learning standards and reducing disproportionality	1. Multi-Tiered System of Supports 2. Universal Design for Learning 3. Identification Practices and Disproportionality Monitoring 4. IEP Development 5. Inclusive Practices Planning, Guidance, and Implementation 6. General Education Classroom Composition, Collaborative Teaching, and Co-Teaching 7. Redesign and Rebrand Academic Labs 8. Redesign and Rebrand Comprehensive Program Models

9. Equity and Access to Advanced Placement for Students with Disabilities

10. Twice Exceptional

11. Special Education Transportation

12. Assistive Technology

13. Out of District Placements

Leadership

Supporting students with disabilities (including increased collaboration and ownership of school administrators and staff) and coordinating efforts with community organizations to improve results

14. Inclusive Education Vision and Planning

15. PPS Organizational Structure

16. Cross-Departmental Collaboration

High Expectations

Increasing expectations of students with disabilities by presuming competence and incorporating culturally relevant, growth-oriented practices

17. Academic Optimism and Growth Mindset

18. Elevate Rigor

19. Measure Instructional Beliefs and Practices

Human Capital

Investing in people from recruitment to retirement to ensure highly qualified and effective staff have the skills/training needed to provide services and support to promote the success of diverse learners

20. Professional Development

Systems and Structures

Defining expectations for service delivery, resource allocation, and data management infrastructure to guide data-driven decisions

21. Special Education Policy and Procedure Manual

22. Transparent Staffing Allocation Model

23. Out of District Placement Student Data and Financial Monitoring

Family and Community Engagements

Embracing partnerships to make informed decisions and provide equitable opportunities for all students

24. Enact Report Recommendations

25. Family Friendly Guides

26. Website

27. Parent Trainings

28. Family Engagement Vision

Learning Environment and Specialized Services

1. Multi-Tiered System of Supports

- **MTSS framework.** Build on GPS's current RTI and PBIS processes to develop a unified and clear structure of MTSS for academic achievement, positive behavior, and social/emotional growth (including enrichment) for all students. Create guides to explain how the intervention models, such as RTI, PBIS, etc., complement each other.

- **Districtwide leadership team.** Develop an MTSS cross-departmental district-level leadership team, including senior leadership, school principals, and representatives from every educational unit (e.g., special education, Title I, bilingual, gifted, etc.). Schedule meetings at least monthly to review, update, operationalize, and monitor the fidelity of MTSS implementation. Establish comparable school-based leadership teams to oversee MTSS implementation at each school.

- **Expectations**. Establish, communicate, support, and monitor clear expectations for MTSS, with clear lines of accountability and responsibility across departments and schools, aligning them with relevant standards and guidelines.

- **Guard rails**. Determine what expectations will be required district-wide and which will be a school-based decision. Incorporate the expectations into administrator, principal, teacher, paraprofessional, and related-service personnel evaluations.

- **School-based MTSS teams**. Require all schools to operate a school-based MTSS team to support problem-solving, data-based decision making at all tiers to support academic advancement and positive behavior, and consistency between schools. Ensure principals schedule time for teams to implement the problem-solving process, meet and review progress monitoring and intervention data, be empowered, and be held accountable for adjusting school schedules to provide the necessary supports for all struggling students.

- **Written guidance.** Create an electronic user-friendly, and accessible MTSS manual for school teams and for parents to understand the MTSS process and to document procedures/practices relevant to the management/operation of MTSS in GPS. Include protocol for collecting progress monitoring data and assessing student growth; what constitutes adequate progress and associated lengths of time to allow for progress, and requirements for initiating a special education evaluation when such progress is not shown. Ensure a common understanding and buy-in around the district for the need for MTSS, why and how it is implemented, what desired targets it is intended to meet, and what progress the division is making toward achieving the goals. Maintain the manual by updating it regularly as there are changes to policy or practice.

- **Electronic dashboard**. Develop a transparent and widely accessible district-wide early warning dashboard to monitor student intervention data use and growth for academics and behavior to enable leadership at the central office and schools to review MTSS (RTI and PBIS) implementation and student growth, identify patterns, solve problems, and make data-informed decisions. Review and expand upon rubrics currently in use to have a universal set of documents that are relevant based on grade levels and types of schools.

- **Universal screening**. Decide upon and purchase standard evidenced-based universal screening tools for academics, including dyslexia, and behavior and implement them throughout the district, with an initial focus at the elementary level.

- **Professional development**. Provide MTSS professional development (inclusive of RTI and PBIS) for all school-based staff. Have central office staff develop turn around trainings for school-level staff, so a unified voice is heard throughout the district.

- **Equity**. Provide training on the implications of race/ethnicity/language, socio-economic status, and culture constructs for MTSS teams when developing student intervention plans.

2. Universal Design for Learning

- **Training.** Provide clear guidance and mandatory training for all district and school leaders, and teachers on the principles of UDL and how these principles can be applied in the development of curriculum, instruction, and assessment. Leverage assistant principals and teachers who previously received UDL training to help guide training content based on their lessons learned and to actively support the training process.

- **Implementation.** Use UDL principles consistently so that all students can access grade-level material and can help close achievement gaps between students with disabilities and their non-disabled peers. Consult with technology leaders and personnel about potential purchases and associated potential impact on their work.

3. Identification Practices and Disproportionality Monitoring

- **Tracking disproportionality in disability identification.** At least quarterly, use the risk ratio to measure the identification rates of students with IEPs by race/ethnicity and other important indicators, such as language status, free and reduced lunch status, giftedness, etc., to identify any student group that it is two times more likely than peers to be identified as being over-identified (i.e., risk ratios).

- **Tracking activity timeliness.** Analyze timelines to assess if there are delays in providing interventions, delays in determining inadequate student progress, delays in initiating a special education evaluation (based on data), and evaluation completions.

- **Tracking school identification rates.** Analyze longitudinal data to determine which schools may be identifying students with IEPs at a rate that is disproportionately higher than other schools.

- **Data review and hypotheses.** With a cross-departmental group of leaders and staff, use this data to develop hypotheses for identified disproportionate risk ratios for any group of students, delays in the evaluation referrals and completions, and/or schools with disproportionately high new identification rates.

- **Follow-up action.** Based on these hypotheses, develop any additional written guidance needed to clarify procedures and practices, consider any additional resources and strategies needed along with a written plan, if appropriate, and provide training to support implementation. For example, identification disproportionality training would include the implications of race/ethnicity/language, socio-economic status, and culture constructs for school-based teams when considering students for an evaluation.

- **Monitoring.** Based on the areas of practice identified through the above activities, identify data to be collected and monitored, along with any practices to be monitored, to support consistent implementation across GPS and to identify schools needing additional support or intervention.

4. IEP Development

- **Written procedures.** Include in GPS's written special education guidance standards and examples for IEP development processes that are appropriate and consistent across the district. Guidance would include but not be limited to Present Levels of Academic Performance (PLOP) and data use within; IEP goals; accommodations; and progress reporting. Include a

procedure for discussing additional material and human resources than those currently available to meet a particular student's needs, including those needed for students who would otherwise be placed out of district.

- **IEP goals.** Ensure IEP goals are based on student needs identified within the PLOP ensuring that goals are not being created or influenced by district limitations within GPS's current continuum of services.

- **Monitoring IEPs.** Establish and implement a process for periodically reviewing student IEPs for their consistency with expected standards. Consider using a school-based process, which would include an impartial GPS facilitator to review, analyze and discuss IEPs with teachers and related service providers.

- **Electronic data repository.** Study electronic data repositories to improve data collection ease and subsequent reporting of student data for quarterly IEP progress reporting to choose one that would meet GPS needs.

- **Collaboration.** Foster positive PPT collaboration by creating more planning time between general education and special education teachers; ensuring adequate time and coverage for staff participating in PPT meetings; and transparent processes around timelines, data, and information sharing with parents to enhance trust and partnership among all PPT members. Provide interpreters for parents who are non-native English speakers and translate IEP documents.

5. Inclusive Practices Planning, Guidance, and Implementation

- **Inclusive education framework.** Develop and use a structured framework/model that will help promote and support the implementation of best practices for inclusive education including the provision of high yield collaborative teaching, specially designed instruction and related services. As part of this process, consider the Recommendations 6 – 13 below.

- **Implementation guide.** Develop a clearly articulated district/school implementation guide based on the inclusive education framework with expected guidance, procedures and practices. Determine the role of schools to adapt the framework to their unique needs versus GPS requirements. This process could also include GPS's advance approval for a school to adapt the framework with deviations GPS defines as significant.

- **Scheduled time for collaboration.** Establish written guidance for the use of inclusive master school schedules, which establish common planning time for collaborative teaching, co-teaching, and other activities for general educators with special education and other personnel. Develop various scheduling models that schools could use and/or adapt.

- **Cross-department collaboration.** Through intentional collaboration between interim PPS Chief and her leadership team, Director of Curriculum and Instruction, and Math and ELA content specialists; further study achievement and suspension gaps between students with IEPs and their typically developing peers on state standardized assessments, and between students with IEPs by race/ethnicity, English learner status, social economic status, gender, etc. Use this information to inform discussions about improving GPS's continuum of services, including making inclusive instruction more effective.

6. General Education Classroom Composition, Collaborative Teaching and Co-Teaching

- **General education classroom composition.** Establish a maximum student classroom ratio for students with and without disabilities for general education and monitor the ratio to ensure

these configurations are not "inclusion in name only" and do not comprise a majority of students with IEPs and 504 Plan taught solely by general education teachers.

- **Collaborative consultation.** Draft guidance for collaborative and consultative teaching to support students with disabilities. Under this model, general educators along with one or more other educators (e.g., special educator, reading specialist, EL teacher, gifted/talented teacher) collaborate around the designing, delivering, monitoring, and evaluating of instruction in general education classes, with the general educator providing instruction.

- Co-taught instruction. Draft guidance for the delivery of co-taught instruction based on the most effective model for instruction purposes and use of the special educator.**[7]** Based on the developed guidance, provide intensive professional development and follow-up coaching and modeling to give co-teachers the information and support they need to be true partners in the planning and delivery of classroom instruction. Monitor implementation through classroom walk through activities that are guided by observation protocol for this purpose.

- Professional development. Provide professional development on collaborative teaching, co-teach to ensure teachers engage in a true instructional partnership. Provide planning time for general education and special educators and others to become true collaborative partners.

7. Redesign and Rebrand Academic Labs

- Rethink Academic Lab model. Reimagine and rebrand Academic Labs by providing written protocols for all grade levels for a flexible grouping model in which students with disabilities are provided intensive supplementary instruction in areas no longer covered by grade level core curriculum. For example, phonemic awareness, phonics, fluency, math computation, etc. Ensure these classes have the materials students need to increase the trajectory of their learning in their particular area(s) of need. View this setting as an extension of classroom instruction for students with IEPs who need short bursts of additional time outside for these purposes to learn grade-level content.

- **Inclusive supplemental learning model.** Consider staffing a learning model for students with and without disabilities with a general educator to supplement regular classroom lessons to introduce lessons with more intensity and reinforce what was taught.

- **Professional development.** Provide professional development for teachers involved with these models so they understand their roles and can carry them out.

8. Redesign and Rebrand Comprehensive Program Models

- **Analyze current comprehensive classes.** Complete a deeper analysis of students, instruction, and materials in each of the current Comprehensive classes (area of disability, skill level, communication and other supports provided, assessment data, student-teacher-paraprofessional ratios, etc.) to create an accurate description of who and what is taught. Also, for each class by Comprehensive intensity, assess student profiles that include their individual instructional needs, as well as progress they have made over the past school year.

- **Reconstruct instructional models.** Based on this program review, analyze gaps in instructional needs, materials, assistive technology, student to adult ratios, etc., within and between current programs. Create and rebrand with new models that collectively address all individualized student needs and is flexible enough to maximize the receipt of grade-level content, interaction with nondisabled peers, and improve achievement and positive behavior

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[7] See Marilyn Friend's website, *The Co-Teaching Connection* for information about six models of co-teaching, retrieved from http://www.marilynfriend.com/approaches.htm, as well her home page with additional resources, retrieved from https://coteach.com/.

along with social/emotional well-being. Continue to resist grouping students by disability label and instead rely on their learning needs regardless of disability nomenclature. Furthermore, do not limit resources to a particular instructional model. Instead allow for flexibility so learning materials and other resources are allocated based on student need and not dictated by a particular model. Document the models with written information to inform professional development and resource needs.

Professional development. Provide professional development for all personnel associated with the newly developed models of instruction. As part of the more generalized professional development specified in these recommendations, emphasize that in all circumstances it is not appropriate for students to be referred to by their placement name (e.g., "comprehensive" or "mildly comprehensive students," etc.), as using such titles is not respectful and is stigmatizing. Instead, emphasize the use of "people first" language, where the emphasis is on students and not their placement.

9. Equity and Access to Advanced Placement for Students with Disabilities

- **Address barriers to equity and access.** Develop a coherent plan across grade levels and schools to enable a higher proportion of potentially qualified students with disabilities to benefit from advanced academic studies/courses. As part of this process, consider teacher and parent input to analyze current barriers to access for students with disabilities and develop a plan to mitigate these challenges.

- **Written guidance and training.** Provide written guidance and other information to IEP teams, school-based staff, and parents about how students with disabilities can access advanced placement courses, with appropriate supports and accommodations.

- **Track increased enrollment.** Establish a goal and target to increase current enrollment of students with disabilities in advanced placement and other enrichment/advanced learning courses, and monitor enrollment data on a quarterly basis.

10. Twice Exceptional

- **Identification as student who is gifted**. Establish parameters for GPS's identification of students who are to give clarity to students who are "twice exceptional," i.e., students with disabilities who are gifted. Ensure that GPS's usage of the gifted term aligns with state guidance and data reporting requirements.

- **Potential for gifted identification**. Review records of students with disabilities for data to identify those with advanced aptitude or skills to support potential identification as a student who is gifted.

- **Guidance, training, and support**. Provide schools with the guidance, training, and support necessary to better understand how to implement viable programming and strategies for twice exceptional students to: nurture the student's potential; support development of compensatory strategies; identify learning gaps and provide explicit instruction; foster social and emotional development; and enhance their capacity to address their mixed ability needs.

11. Special Education Transportation

- **Protocols**. Develop protocols to provide clear delineation and communication between the Transportation Office and the PPS Office. Include a provision that requires the PPT meeting notice to include transportation personnel when non-routine transportation is likely to be discussed. Also, include a provision showing who would be responsible for sharing the PPT notice and meeting invitation to specified transportation personnel. Also, if transportation based

on student disability needs is not clearly written and understood, include this information in the transportation protocol.

- **IEP required transportation**. Clearly define the role of the Transportation Office as it relates to the PPS Office to ensure that once an IEP includes transportation services, the transportation personnel must implement the service regardless of whether they agree or disagree with the PPT decision.

- **Monitoring**. Monitor the protocol to ensure it is implemented as intended.

12. *Assistive Technology*

- **AT plan and quality indicators**. Create, and implement with fidelity, an AT Plan and measure its overall success by using the Quality Indicators of Assistive Technology (QIAT), which is designed to assess overall quality of AT programming.

- **Professional development**. Provide staff training on how AT (low and high-tech devices) can be used for a myriad of student needs.

13. *Out of District Placements*

- **Parent outreach**. Talk with parents and PPT teams who sought or obtained an out of district placement to better understand their motivations and GPS program gaps.

- **School assessment**. Visit or obtain other information about the most common out of district placements to ascertain how these resources are different from any currently available for any student in GPS schools.

- **Cost analysis.** Consider the cost of out of district placements, including costs associated with transportation and complaint/due process resolutions, and how this money can be used instead to provide these and other resources within GPS schools. Use this information to develop the instructional models described in the above recommendations.

Also see Recommendation #23, which pertains to monitoring of out of district placements.

Leadership

14. *Inclusive Education Vision and Planning*

- **Guiding vision and mission**. Have the Board of Education and GPS management include effective inclusive education in their vision and mission.

- **Clear expectations**. Either in the vision/mission or other document communicate to schools, parents, and the broader community that GPS expects and will take steps to ensure 1) students with disabilities make the greatest amount of progress possible in the general education curriculum (or modified curriculum per IEPs) through rigorous and high quality standards-aligned instruction, and specially designed instruction and interventions, along with differentiated instruction, accommodations, and modifications; and 2) partnerships with families are trusting and collaborative.

- **Strategic plan**. Develop a long-range strategic plan based on the above recommendations as well as other relevant information.

15. PPS Organizational Structure

- **Organizational structure**. Reorganize the PPS Office by function, reducing the number of direct reports to the Chief and adding instructional coaching positions specifically designed to model/support use of high-quality inclusive practices and specially designed instruction by special educators. Either change the name of the department to one such as Specialized Instruction and Support Services or clarify the functions within the existing office so all are clear on its focus.

16. Cross-Departmental Collaboration

- **Schedule collaborative meetings**. Establish a schedule for routine, collaborative meetings between the PPS Office and other departments, e.g., English learners, with individuals necessary to share information, problem-solve, and resolve issues of mutual concern. Ensure all central office personnel who support schools meet to share information about common issues they can collectively address.

- **Collaborative work**. Use these collaborative partnerships to establish consistent and integrative approaches to support improved instruction for various purposes by creating cross-functional workgroups.

- **Key performance indicators (KPIs)**. Set goals for all cross-departmental initiatives and establish KPIs with targets to measure the extent to which they are beneficial or require modification.

High Expectations

17. Academic Optimism and Growth Mindset

- **Communication of high expectations**. Set high expectations both through establishing an inclusive vision (see recommendation #14 above) and through joint statements from the superintendent and Board of Education regarding the provision of rigorous instruction and supports and related services delineated in IEPs so students have the necessary tools they need to access high quality instruction.

- **Collaboration support**. Guide the design of intentional structures and resources needed to help foster greater collaboration across disciplines, grade levels, and areas of specific expertise.

- **Monitoring**. Develop and implement protocols for fidelity checks on IEP delivered versus prescribed instruction and services (e.g., co-teaching, instructional and testing accommodations/ modifications, specially designed instruction, related services, etc.).

18. Elevate Rigor

- **Professional development**. Ensure that all professional development designed and delivered elevates instructional rigor that is inclusive of students with disabilities. Focus information on best practices for motivating learners and setting high expectations, addressing UDL and differentiated instruction, progress monitoring, and mastery of learning.

- **Resources**. Include how this information will be supported with necessary material and human resources.

19. *Measure Instructional Beliefs and Practices*

- **Annual teacher survey.** Conduct an annual survey to measure teachers' instructional beliefs and the extent to which they understand presumed competence. Analyze results by school and teacher role.

- **School plans.** Develop a plan protocol by which each school site would design instructional and support improvements to increase student achievement and positive behavior outcomes over time.

Human Capital

20. *Professional Development*

- **Plan.** Develop a professional development plan based on the needs identified in this report targeted to different audiences, e.g., general educators, special educators, related service personnel, paraprofessionals, parents, etc.

- **Learning forward standards.** Ground training in the Learning Forward Standards for Professional Learning[8] and embed the following components:

  o **Mandatory annual trainings.** Because of the importance of principal and assistant principal leadership on special education matters and PPT meetings, establish a robust training plan for principals and other school-based administrators on areas of mutual informational needs specific to special education administration. Determine which trainings principals and other school-based administrators are required to attend each year and develop a process to ensure this happens.

  o **Cross-functional teams**. Cross-train individuals from different divisions/departments to maximize their knowledge and skills to leverage their collective resources to provide direct support, mentoring, coaching, and technical assistance to principals and teachers.

  o **High quality trainers.** Ensure that all trainers are knowledgeable and effective. Identify and use exemplary school-based staff in addition to others.

  o **Access to differentiated learning.** Differentiate professional learning according to each audience's skills, experience, and needs. Have professional learning and technical assistance continue for new personnel and those needing additional support.

  o **Multiple formats.** Use multiple formats (e.g., videos, webinars, and narrative text) and presentation approaches (e.g., school-based, small groups). Continue to build out blended learning opportunities so that all staff can more easily access the content.

  o **Exemplary implementation models**. Identify and share district-wide best practices that demonstrate high expectations and effective implementation to ensure they include students with IEPs, ELLs, students who are twice exceptional, etc. Encourage staff to visit exemplary schools and set aside time for that to happen.

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[8] Retrieved from http://www.learningforward.org/standards#.UMvVD7Yt0kU

Systems and Structures

21. Special Education Policy and Procedure Manual

- **Red Book**. Revise the existing Red Book into an interactive, web-based GPS special education manual to support user-friendly and transparent access to procedures/practices relevant to the management and operations of special education and to which school staff can be held accountable for implementing. Streamline resources so that school teams can easily access relevant information and use embedded hyperlinks to provide information for staff as needed. Update the manual on a routine basis. Include criteria, procedures, and practices for each area in the manual relevant to the implementation of these recommendations, e.g., criteria for child find; MTSS progress criteria to support the referral of students for special education evaluations; inclusive instruction; revised continuum of services; transportation protocol; etc.

22. Transparent Staffing Allocation Model

- **Current staff allocation analysis.** Conduct an in-depth analysis of staffing allocations to better understand how schools organize personnel (by grade, by subject, etc.) to provide services required in IEPs.

- **New allocation model.** Create a workgroup with representatives from school and central office leadership (including principals, representative special and general educators, related services personnel, and PPS and Finance personnel) to develop a new, transparent funding model and assess the extent to which current personnel are available to support the intended outcomes of effective service delivery and the continued enhancement of inclusive practices.

- **Communicate model, address gaps with current staff, and review annually.** Make the revised formula transparent and evaluate needed changes for the short and long term. Review on an annual basis.

23. Out of District Placement Student Data and Finances Monitoring

- **Monitor placements.** Develop a system to monitor out of district placements, including number of students placed, number of years each placed, GPS school from which student was placed, reason for placement (e.g., need for more intensive instruction, behavior, etc.), trigger for placement (e.g., IEP-driven decision, settlement agreement, litigation requirement, etc.), placement contracts, and finances. Review data trends monthly.

- **Assess placements.** Based on the data above, at least annually review trends and how GPS might reconfigure its human and material resources to provide PPTs better and more flexible in-district options for students and to give PPS leaders more options when considering settlement decisions and educational justifications for GPS placement to present during due process hearings.

Family and Community Engagement

24. Enact Report Recommendations

- **Implement and publicly report recommendation progress.** In order to build community trust, implement the recommendations in this report and publicly report at least twice per year on progress made or obstacles/delays encountered.

25. Family Friendly Guides

- **Parent information.** Collaborate with school personnel, principals, other school-based groups, and local parent and advocacy groups representatives to develop a parent manual, including information and resource links that would be useful for parents in understanding the IEP process. Supplement it with one-page brochures to further access to this information. Also, ensure the information is accessible to parents with diverse linguistic needs and sensory limitations.

- **Parent friendly training.** Plan face-to-face training and online modules to provide parents an understanding of the information in the manual. Ensure training is accessible to parents with diverse linguistic needs and sensory limitations.

26. Website

- **Content.** At least annually, review and update materials posted on the GPS website regarding special education instructional models, related services, and supplementary aids and services. Ensure this information is clearly accessible and comprehensive and accessible to parents with diverse linguistic needs and sensory limitations.

27. Parent Trainings

- **Parent training plan**. In consultation with representatives of parent support groups, develop a training plan for families in the areas of IEP process, role of the child study team, helpful hints for parents at home, and how families can take an active and collaborative role at IEP meetings.

28. Family Engagement Vision

- **Collaborative vision**. With representatives of parent support groups, preschool special education leaders who have earned high survey results in this area, as well as other GPS diverse representatives, have discussions about family engagement, specific to special education. Based on these discussions, create a core belief vision statement of agreed-upon ideals. Share it with other stakeholders to build family engagement support across the District.

PUBLIC
CONSULTING GROUP

Solutions that Matter