

IMPROVING SPECIAL EDUCATION SERVICES IN THE PROVIDENCE PUBLIC SCHOOL DISTRICT

**Report of the Strategic Support Team
Of the
Council of the Great City Schools**

**Submitted to the
Providence Public School District**



Summer 2011

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ACKNOWLEDGEMENTS

The Council of the Great City Schools thanks the many individuals who contributed to this review of special education programs in the Providence Public School District (PPSD). Their efforts were critical to our ability to present the district with the best possible proposals for improving special education and related services in the school system.

First, we thank former Superintendent Tom Brady. It is not easy to ask one's colleagues for the kind of review conducted by the Council's teams. It takes courage and openness and a real desire for change and improvement. Even as he was planning his departure, he wanted to ensure that the district had the best possible advice going forward.

Second, we thank the PPSD's school board, who approved the conducting of this review. We hope this report meets your expectations and will help improve special education services across the system.

Third, we thank the members of the school district staff, especially Lisa Vargas Sinapi and Karen Vasella, the district's special education directors for elementary and secondary-level schools. They organized the team's interviews and provided all the documents and data we needed in order to do our work. The team received well-organized and thorough information and the full cooperation of staff during this process. Most people have no idea how much time is required to organize a review such as this, much less the time to conduct it and write up the draft and final reports. The details are numerous and time-consuming.

Fourth, the Council thanks the parents, community members, and advocates with whom we met. They work passionately to support children with disabilities and ensure the district serves these students in the best possible manner.

Fifth, the Council thanks the Los Angeles Unified School District and the Miami-Dade County Public Schools for contributing staff members to this effort. The enthusiasm and generosity of these districts serve as further examples of how the nation's urban public school systems are banding together to help each other improve performance for all students.

Finally, I thank Julie Wright Halbert, the Council's legislative counsel, who facilitated the work of the team, and Sue Gamm, a nationally known expert in special education, who worked diligently with Ms. Halbert to prepare the final report. Their work was outstanding, as always, and critical to the success of this effort. Thank you.

Michael Casserly
Executive Director
Council of the Great City Schools

CHAPTER 1. OVERVIEW AND BACKGROUND

At the time of the Council’s site visit, Tom Brady, then superintendent of schools in Providence, was working to transform the school district into a more open, transparent, and effective operation for all students, their families, and the greater Providence community. He and the current interim superintendent, Susan F. Lusi, believe strongly in the potential of the Providence Public School District (PPSD) to be one of the leading urban school districts in the nation.

The district’s nine-member mayoral-appointed school board serves for staggered, three-year terms and governs the school district and hires and evaluates the superintendent. The mayor of Providence establishes a nominating commission to seek out and screen potential school board members on an annual basis and recommend candidates to the mayor for appointment or re-appointment. Upon confirmation by the City Council, three selected members officially assume office in January of each year. The school board meets twice each month, once to conduct business and once to convene a workshop on topical issues.¹

In 2010-11, the PPSD was the largest school district in Rhode Island, enrolling 23,695 students. This number included 4,460 students who received special education—or about 17.1 percent of the total 6-21 year old student enrollment,² compared with a rate of 19.7 percent statewide and 13.4 percent nationwide. The school district has a total enrollment that is 62.8 percent Hispanic, 18.8 percent African American, 9.3 percent White, 5.3 percent Asian, and 3.9 percent multiracial, Native American, and Pacific Islander. Some 89.6 percent of the district’s students are eligible for a free or reduced-price lunch, and about 14.6 percent are English language learners (ELL).

The district operates 45 schools, including two that are chartered, and employs some 3,236 individuals, including 1,895 teachers. Providence schools had a general operating budget of approximately \$399 million in 2010-11.

The PPSD has a vision statement calling for the school district to be a national leader in educating urban youth. To this end, the district’s mission is to prepare all students to succeed in the nation’s colleges and universities and in their chosen professions. Core values of respect, equity, excellence, accountability, and appreciation for diversity help to guide the district’s actions and the realization of its three main districtwide goals:

¹ See <http://www.providenceschools.org/inside-ppsd/school-board> for current update of board changes since the Council visit.

² The 17.1 percent rate does not include early childhood students with disabilities. Including these students would yield a rate of 18.8 percent.

1. Increase student achievement
2. Build capacity through an infrastructure of support
3. Strengthen parent and community engagement.

To improve student outcomes and realize core values and commitments, the school board adopted a strategic-direction policy that articulates a comprehensive curriculum framework for aligned instruction. The instructional system was developed collaboratively by central-office support staff members and Providence teachers, who were supported by consultants from the Charles A. Dana Center at the University of Texas at Austin (math and science), the University of Connecticut (English language arts), the National Center for History in the Schools, and World History for Us All.

The Council's Strategic Support Team working on this review heard consistent recognition and appreciation of the district's work on this new curriculum and its alignment with standards. Although state NECAP assessments show improved outcomes at the elementary level, the district continues to operate under a corrective action plan designed to meet adequate yearly progress (AYP) requirements.

During this period of unprecedented challenges for the school district, particularly its financial challenges, school district leadership requested this review of the school system's special education programs in order to improve services regardless of the budgetary constraints. Everyone involved wanted the best recommendations the Council of the Great City Schools could devise as a way of improving special education service delivery.

CHAPTER 2. PURPOSE AND ORIGIN OF THE PROJECT

Former Providence schools superintendent Tom Brady asked the Council of the Great City Schools to review the district's services for students with disabilities and to provide feedback and recommendations to the Office of Special Education that would help to create and provide effective and quality programming to support students with disabilities and students at risk. This review was written to provide feedback to the district in a way that would assist it in developing a five-year plan to improve outcomes for students with disabilities and to build capacity of the district to educate Providence students in the least restrictive environment. At the outset of our work, the district expressed specific objectives for this project:

- To increase student achievement and access to the core curriculum for students with disabilities.
- To improve the provision of social/emotional supports, with an emphasis on the Behavior Intervention Program, and to recruit and retain qualified staff to work with students with social and emotional needs.
- To implement Response to Intervention (RTI) effectively, including the use of data-based decision making.
- To provide effective professional development for behavior training/social emotional supports and expansion of RTI to support positive student behavior.
- To recruit and retain staff for hard-to-fill staff positions, such as speech pathologists.
- To provide effective transition services.
- To effectively use the district's information data system and technology services.
- To understanding differences between language acquisition, a learning disability, and a speech/language impairment, and to understand how these apply in the district for English Language Learners (ELL) and students with disabilities.

The Work of the Strategic Support Team

The Council assembled a team of experts who have successfully administered and operated special education programs in other major urban school districts around the country. These individuals also have firsthand expertise regarding the reauthorization of the Individuals with Disabilities Education Act (IDEA) and are well versed in federal law and best practices. The Strategic Support Team (the team) visited the district on April 13-15, 2011 and analyzed the district's organizational structure, accountability systems, curriculum and instructional

strategies, individualized education program (IEP) implementation, and other features of the district’s services for students with disabilities. The team briefed the superintendent, school board president, and senior staff at the end of its visit and presented preliminary findings, and proposals.

The Strategic Support Team carried out its charge by conducting interviews and focus groups with district staff members, reviewing numerous documents and reports, analyzing data, and developing initial recommendations and proposals before finalizing this report. This approach to providing technical assistance to urban school districts by using senior managers from other urban school systems across the nation is unique to the Council and its members. The organization finds this approach to be effective for a number of reasons.

First, it allows superintendent and staff members to work with a diverse set of talented, successful practitioners from around the country. The teams comprise a pool of expertise that superintendents may call on for advice or help in implementing the recommendations, meeting new challenges, and developing alternative solutions.

Second, the recommendations from urban school peers have power because the individuals who developed them have faced many of the same challenges encountered by the district requesting the review. No one can say that these individuals do not know what working in an urban school system is like or that their proposals have not been tested under the most rigorous conditions.

Third, using senior urban school managers from other urban school communities is faster and less expensive than retaining large management consulting firms that may have little to no programmatic experience. The learning curve is rapid, and it would be difficult for any school system to buy on the open market the level of expertise offered by these teams.

Members of the Strategic Support Team for this project included the following individuals –

<p>KARLA ESTRADA Division of Special Education Los Angeles Unified School District</p>	<p>SUE GAMM, ESQ. Former Chief of Specialized Services Chicago Public Schools</p>
<p>WILL GORDILLO Administrative Director Division of Special Education Miami-Dade County Public Schools</p>	<p>JULIE WRIGHT HALBERT, ESQ. Legislative Counsel Council of the Great City Schools</p>

Contents of This Report

The Strategic Support Team of the Council of the Great City Schools spent many hours interviewing parents, advocates, related-services personnel, special education teachers,

principals, Rhode Island Department of Education (RIDE) staff members, and central-office administrative leaders with responsibility for both special and general education. The team also reviewed studies, data, and other special education reports on the PPSD.

Chapter 1 of this report presents a brief overview of the PPSD. Chapter 2 describes the purposes and origins of this project. Chapter 3 summarizes the findings and recommendations of the Strategic Support Team. These observations and proposals are divided into five broad areas:

A. Identification of Students Eligible to Receive Special Education Services

- Referral Practices
- Disability Prevalence Rates
- Prevalence Rates by Race and Ethnicity
- English Language Learners
- Evaluation Practices

B. Performance of Students with Disabilities

- Academic Performance
- Graduation and Dropout Rates
- Out-of-School Suspension and Unexcused Absences

C. Instructional Practices and Support

- Response to Intervention
- Data Analysis of Students with Disabilities in Various Educational Settings
- Supporting Instruction in Inclusive Settings
- Supporting Instruction in Self-Contained Settings
- Instruction for English Language Learners with Disabilities
- Placement of Students in Out-of-District Placements
- Support for Postsecondary Transition Activities and Services

D. Support for Teaching and Learning

- Special Education Management and Operations
- Staffing Patterns and Usage
- Parent Support and Involvement
- Professional Development
- Use of Technology and Data

E. Accountability for Expected Practices and Results

Each of these sections includes the team's positive observations, areas of concerns, and recommendations. Chapter 4 summarizes all of the report's recommendations, including a matrix showing various components of each one. Finally, chapter 5 presents a brief synopsis of the report and the team's overarching impressions.

Appendix A provides information about valid and reliable assessments for preschool English Language Learners. Appendix B provides a chart showing evidence-based predictors of post-school employment, education, and independent living success. Appendix C compares incidence rates and staffing ratios in various city school systems across the country. Appendix D provides a model for a one-page information sheet for parents developed by the Detroit Public Schools. Appendix E lists documents reviewed by the team. Appendix F lists individuals the team interviewed individually or in groups and the team's working agenda. Appendix G presents brief biographical sketches of team members. Appendix H presents a brief description of the Council of the Great City Schools and a list of the Strategic Support Teams that the Council has fielded over the last 10 years.

CHAPTER 3. FINDINGS AND RECOMMENDATIONS

This chapter presents the findings of the Council of the Great City Schools' Strategic Support Team and its recommendations for improving special education services in the Providence public schools. The findings and recommendations are divided into the following five broad areas:

- A. Identification of students eligible to receive special education services
- B. Performance of students with disabilities
- C. Instructional practices and support
- D. Support for teaching and learning
- E. Accountability for expected practices and results.

Section A. Identification of Students Eligible to Receive Special Education Services

This section addresses the district's referral practices and eligibility decisions for special education services; local, national and state prevalence rates for special education; prevalence rates by race and ethnicity; English language learners receiving special education; and evaluation practices.

Referral Practices

The process of determining whether a student has a disability that requires special education services begins with a referral for an evaluation. According to material provided by the district, staff members from the office of special education review and share information about the referral process and response to intervention (RTI) process with evaluation teams at the beginning of each school year and with teacher-support teams throughout the year.

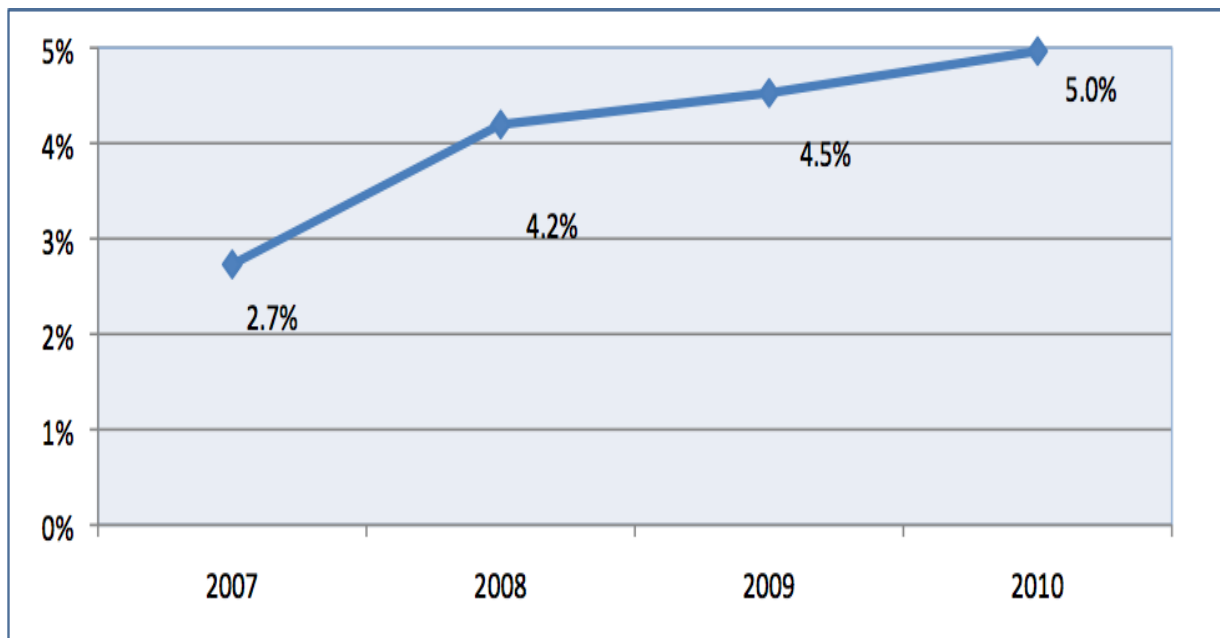
In addition, the referral process is reviewed annually with principals, and they are required to review and sign all referrals before submitting them to the evaluation team. Reportedly, most principals adhere to this procedure, but many do not review and discuss the referral with the teacher.

Special education supervisors and other administrators that lead evaluation teams are required to ensure that referred students have received appropriate instruction and that referrals are appropriate.

Referral Rates over Time

The number of students referred for a special-education evaluation in the Providence public schools increased from 672 in 2007-08 to 1,169 in 2010-11,³ even though the general enrollment declined from 24,610 students to 23,543 over the same period. As a result, the rate of referrals increased from 2.7 to almost 5 percent during this period. (See exhibit 1.) According to district representatives, many of the referrals were the result of increased early childhood screening and outreach.

Exhibit 1. Percentage of PPSD Students Referred for a Special Education Evaluation



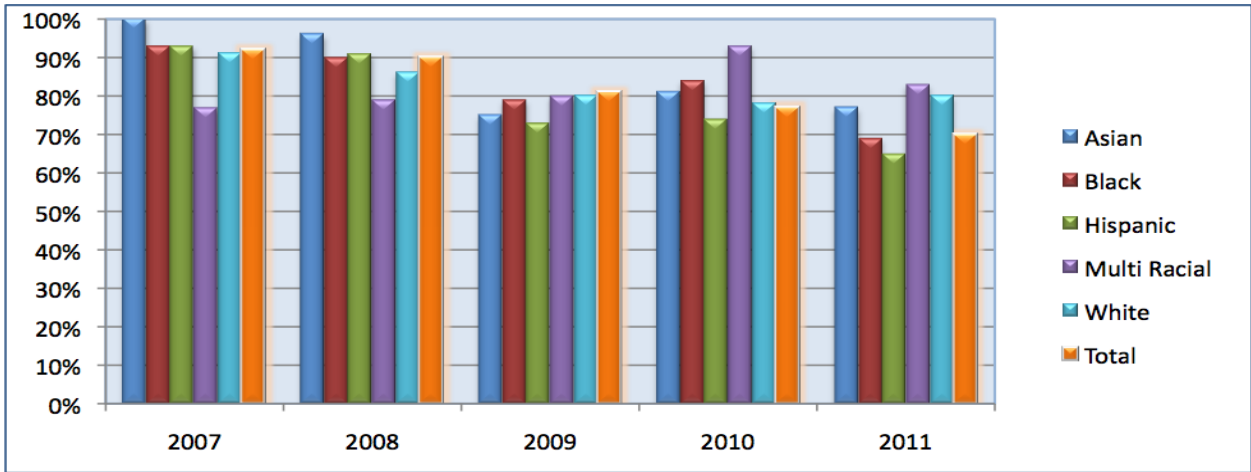
Relationship Between Referral and Assessment

As exhibit 2 shows, almost all students referred for a special education evaluation were approved for an assessment. However, the percentage steadily decreased between 2007 and 2011. Between 2009 and 2011, Hispanic students referred for an evaluation were actually assessed at about 10 percentage points below the rate of all students.

In 2010-11, a larger percentage of Asian, multiracial, and White students referred were assessed than African American (Black) and Hispanic students. (Data on 2011 do not represent a full school year.)

³ Data for 2010-11 were not complete at the time of the team’s review.

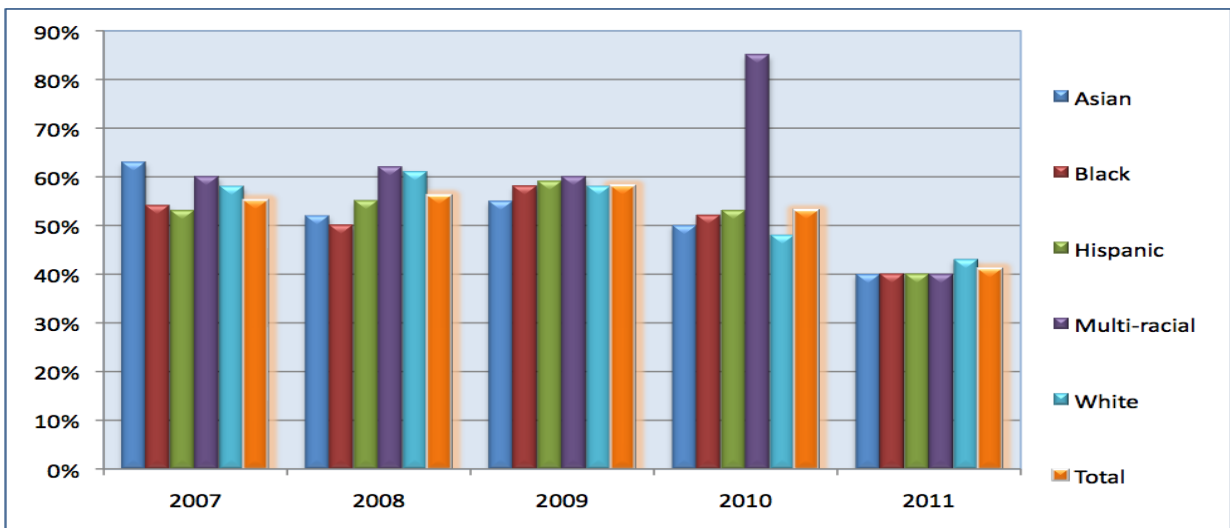
Exhibit 2. Percentage of Students Referred for Evaluation Who Were Approved for Assessment



Relationship Between Assessment and Eligibility

The experience of the Council’s team indicates that about 80 to 85 percent of students nationally receiving a special education evaluation are found to have a disability requiring special education services. As shown in exhibit 3, however, a relatively small percentage of PPSD students receiving an evaluation are found to be eligible for services. The percentages are about the same among all race/ethnicities and were strikingly similar in 2011. In 2010, 85 percent of multiracial students assessed were found to be eligible, a much higher percentage than the 53 percent overall rate, but that percentage appears to be an exception to the longer-term pattern.

Exhibit 3. Rate of Students Assessed Found Eligible for Services



District representatives expressed concern that these data were not accurate because the student information system does not capture eligibility decisions made over the summer or the following school year. More information about the district’s use of data to help manage special education activities is provided in section D, Use of Technology and Data.

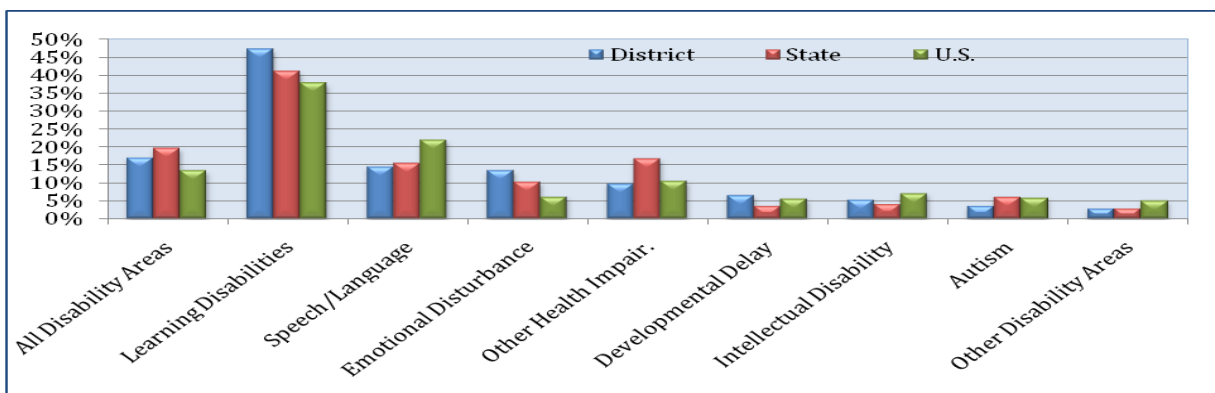
The lower-than-expected eligibility determination rates raise a question about the extent to which school-based teams appropriately screen referred students to determine whether there is a basis for suspecting that a student has a disability. This activity is important to avoid an unnecessary evaluation, which is time-consuming and costly. It takes staff and students away from providing and receiving instructional support, and it is not typically a pleasant experience for students.

Disability Prevalence Rates

Comparison of PPSD Prevalence Rates to the Nation and State⁴

As shown in exhibit 4, 17.1 percent of PPSD students ages 6-21 receive special education services.⁵ While this percentage is much higher than the national rate of 13.4 percent, it is less than the state’s percentage of 19.7. When looking solely at major disability categories, however, PPSD has somewhat higher rates in learning disabilities (47.2 percent) than the state (41.1 percent) or nation (37.8 percent). The same is true for the area of emotional disturbance (ED), where the percentage of PPSD students identified (13.4 percent) is larger than the state’s 10.2 percent and more than double the nation’s 6.2 percent.

Exhibit 4. Comparison of Disability Prevalence Rates (PPSD, Rhode Island, and United States)



⁴ PPSD data for 2010-11: All U.S. and State data on students with disabilities are from the U.S. Department of Education, Institute of Education Sciences for 2007-8. Disability area rates for the United States and Rhode Island are from Data Accountability Center for 2008-9. The disability areas reflect the percentage of each area for all students with disabilities; the percentage of all students with disabilities is based on total student enrollment.

⁵ The rate is 18.8 percent when early childhood students with disabilities are included.

Also notable is the relatively low percentage of students identified as having autism (3.5 percent) compared to the state (6.1 percent) and nation (5.8 percent). Although the district's 14.6 percent of students receiving speech/language services is smaller than the nation's 21.9 percent, it is close to the state's 15.5 percent.

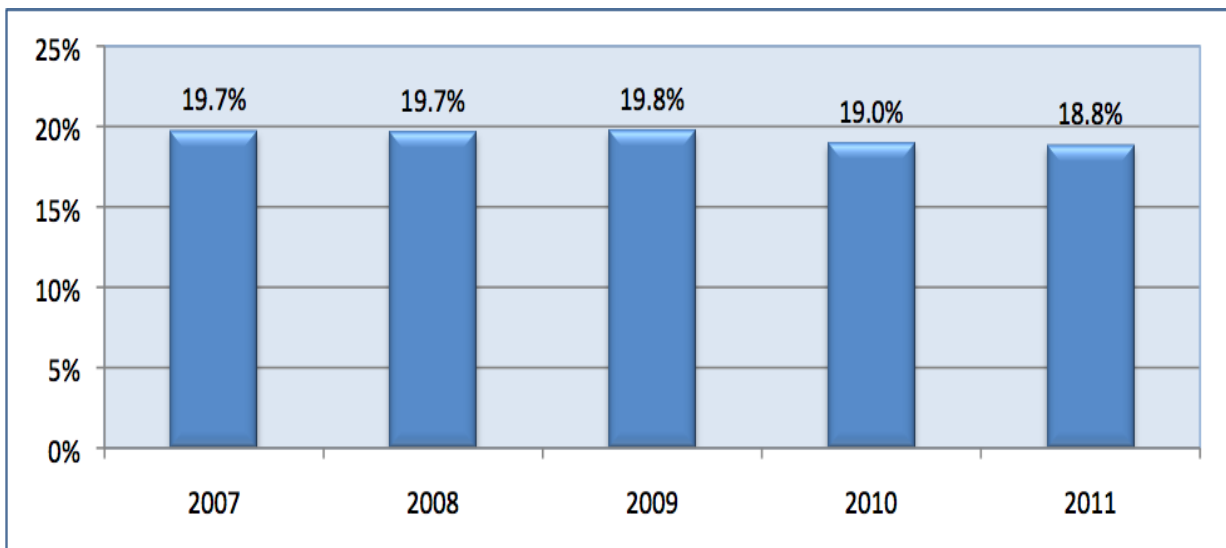
The district's proportions of disabilities are closer to those of the state and nation in the remaining disability areas.

Prevalence Rates over Time

The district recognizes that it has a high percentage of students identified as eligible for special education services (3 through 21 years of age) and has implemented a number of strategies over the years to address the needs of students with academic and behavioral challenges in the general education environment.

As a result, the percentage of students receiving special education services decreased from 19.7 percent in 2006-07 to 18.8 percent in 2010-11. (See exhibit 5.)

Exhibit 5. Percentage of PPSD Students Receiving Special Education Services Over Time

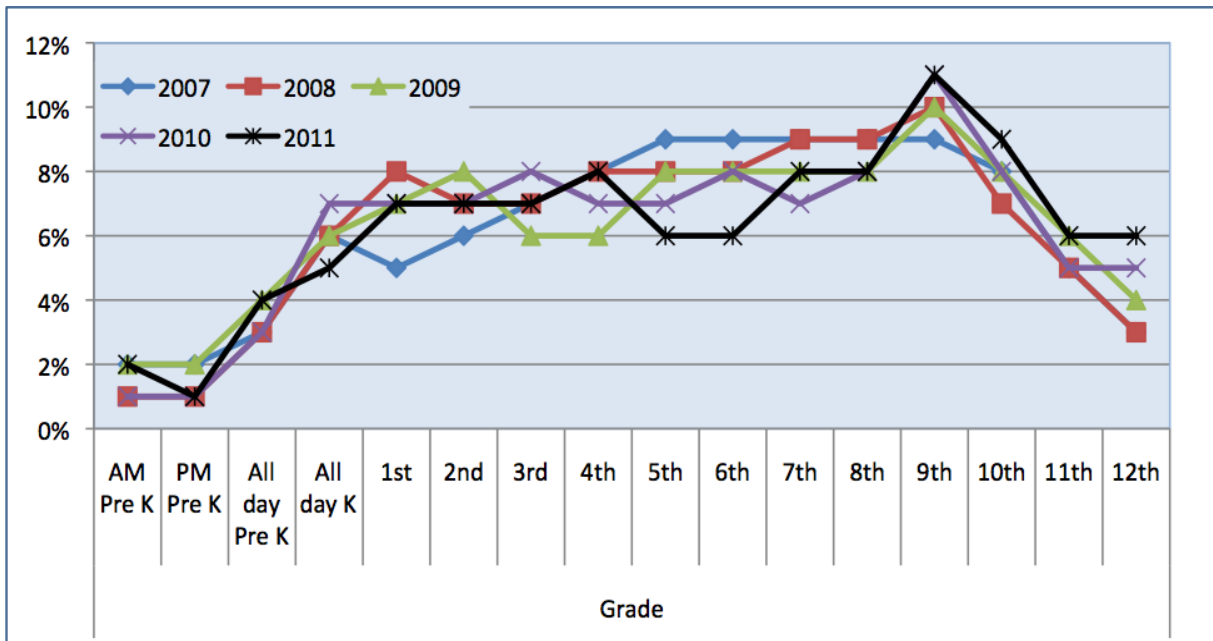


Percentage of Students with Disability by Grade over Time

When examining the percentage of students with disabilities by grade, one sees lower rates in the preschool years and a decline in the secondary grades as well.

Between 2007 and 2011, however, the rates were generally lower in 2011 in grades K, 5, 6, 7, and 8 than they were in 2007, and somewhat higher in grades 9, 10, 11, and 12 in 2011 than they were in 2007. (See exhibit 6.)

Exhibit 6. Percentage of Students with Disabilities by Grade (2007-2011)



Prevalence by Race and Ethnicity

The Council’s Strategic Support Team also analyzed the likelihood of students of differing races/ethnicities being identified as needing special education. The metric comprises two indicators on the federally required state performance plan (SPP). The Rhode Island Department of Education (RIDE) has identified districts as having disproportionate representation when they meet the following three criteria:⁶

- A risk ratio of 2.5 or higher or less than 0.40 for two consecutive years
- A minimum n size of 10 students
- At least a 1 percent difference between the district and national risk.

RIDE applies these criteria to all disability areas as a whole (indicator 9) and to each of the following disability areas: emotional disturbance (ED), learning disabilities (LD), autism, intellectual disability, and other health impairment and speech/language (indicator 10). Although RIDE found that Providence had disproportionate representation in the first three areas, the state agency found no evidence that the disparity was the result of inappropriate

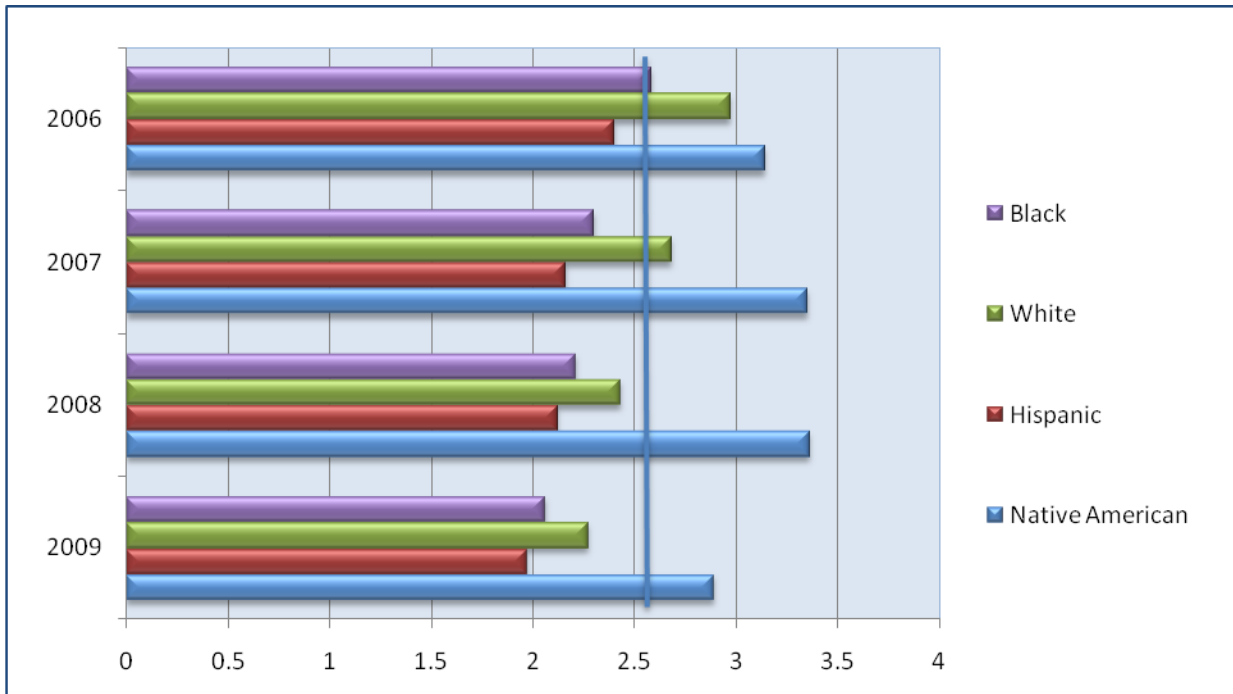
⁶ A risk ratio reflects the likelihood that a student from one racial/ethnic group has a disability, compared with students from other racial/ethnic groups. The national risk reflects the percentage of national school district students from a racial/ethnic group that have a disability, compared with all students in the racial/ethnic group.

identification.⁷ However, because the disproportionality was significant, the district has been required to use 15 percent of its Individuals with Disabilities Education Act (IDEA) funds for early intervening services for students without disabilities to reduce the level of disproportionality. Disproportionality data and district activities to address this issue are discussed below.

All Disability Areas

Between 2006 and 2009, White and Native American students were disproportionately represented in the overall number of students receiving special education in PPSD. However, the risk ratio for these two groups has steadily decreased: Whites (2.9 to 2.6) and Native Americans (3.4 to 2.9). Asian students are neither disproportionately represented in special education nor are over-represented in any particular disability area. (See exhibit 7.)

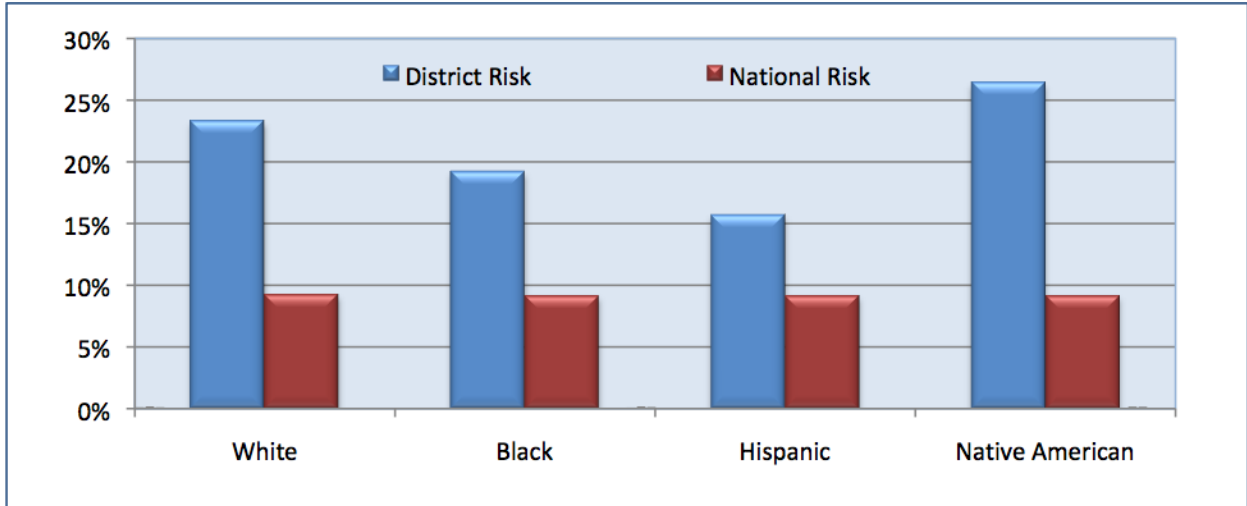
Exhibit 7. Risk Ratio for All Disability Areas (2006-2009)



The district’s White, Black, Hispanic, and Native American groups are much more likely to be identified as having a disability than are students from these same groups nationwide. The greater likelihood for PPSD students relates to the higher percentage receiving special education in the district. (See exhibit 8.)

⁷ February 1, 2011 report to the U.S. Department of Education’s Office of Special Education Programs (OSEP).

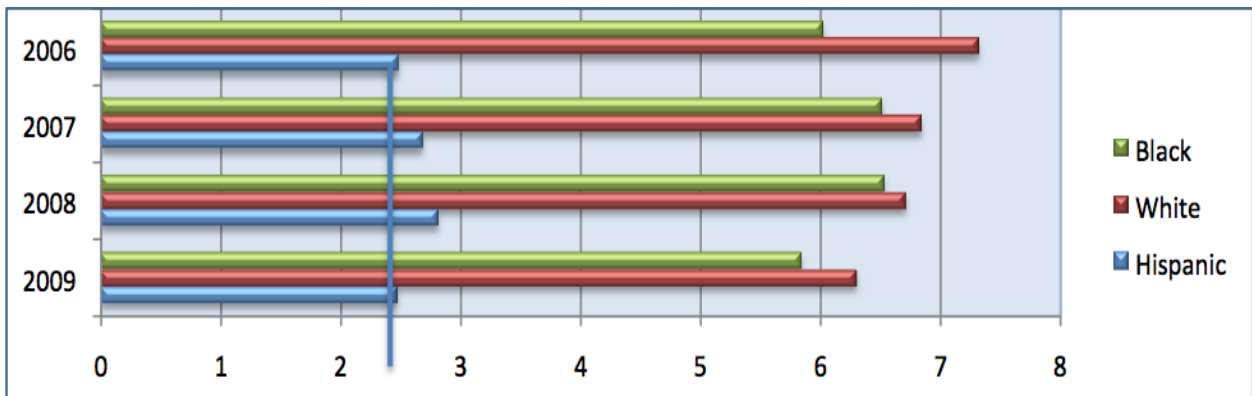
Exhibit 8. Percentage of Students Likely to be Identified as Having a Disability, by Race/Ethnicity, 2009 PPSD, 2007⁸ Nationwide



Emotional Disturbance

White and Black students are disproportionately represented in the area of emotional disturbance (ED). The risk ratios for these groups are decreasing, however. Between 2006 and 2009, the percentage of White students identified in the area of ED declined from 7.3 to 6.3, and the percentage for Black students declined from 6.02 to 5.8. Hispanics, who had a risk ratio of 2.8 in 2008, were no longer disproportionate in 2009 (2.47).⁹ (See exhibit 9.)

Exhibit 9. Risk Ratio for the Area of Emotional Disturbance (2006-2009)¹⁰



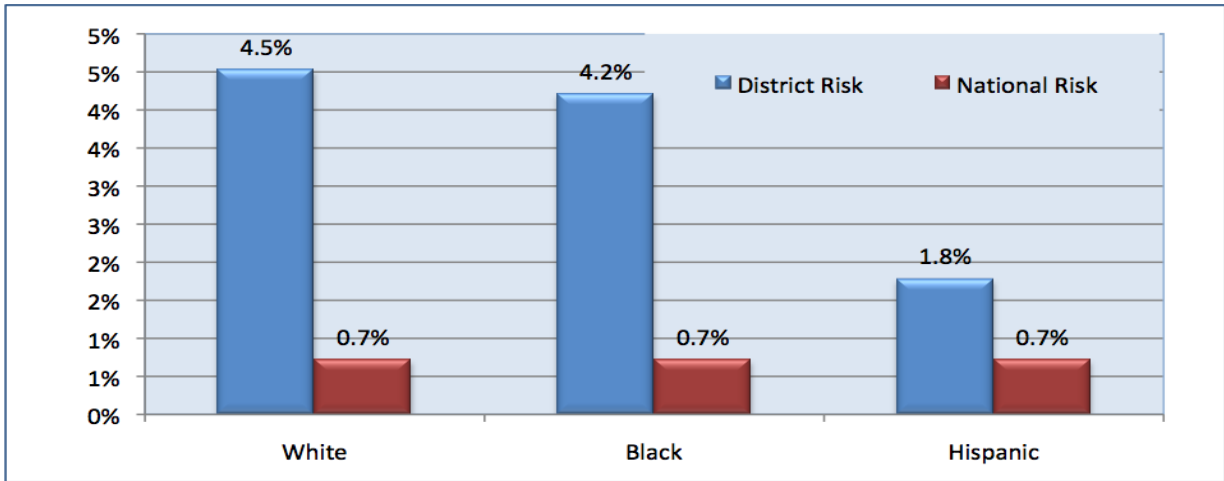
⁸ 2007 is the latest date available for national risk data.

⁹ The number for the Native American subgroup was too small for calculation.

¹⁰ There were not enough Native American students to calculate a risk ratio.

PPSD’s White, Black, and Hispanic student groups each are significantly more likely to be identified as ED than the nation as a whole: White (3.8 percentage points greater than the nation), Black (3.5 points greater), and Hispanic (1.1 points greater). (See exhibit 10.)

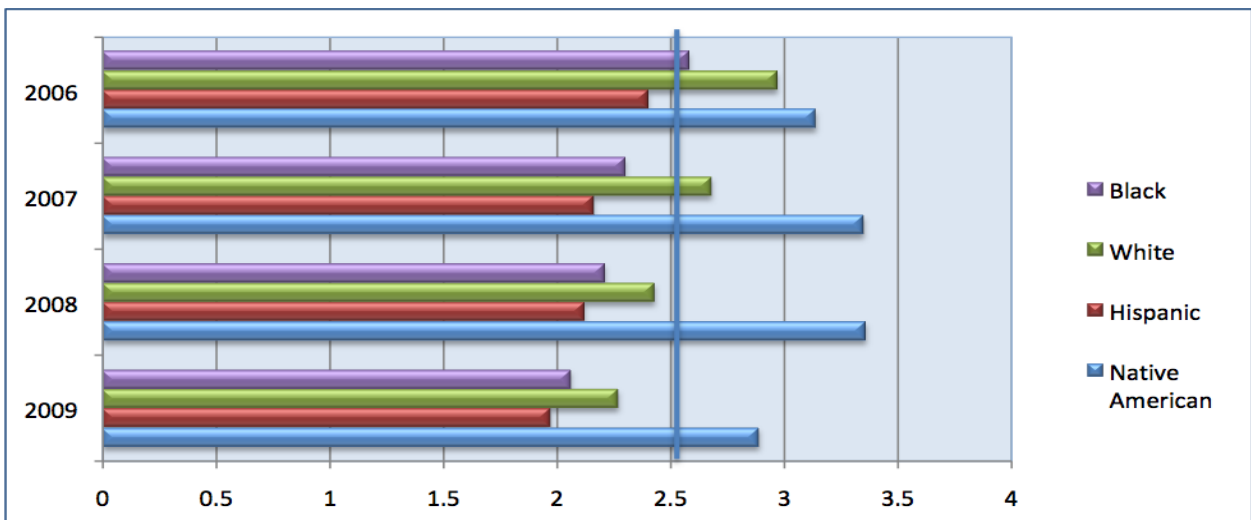
Exhibit 10. Comparison of Percentage of Students Likely to be Identified as ED: 2009 for PPSD and 2007 for Nation



Learning Disabilities

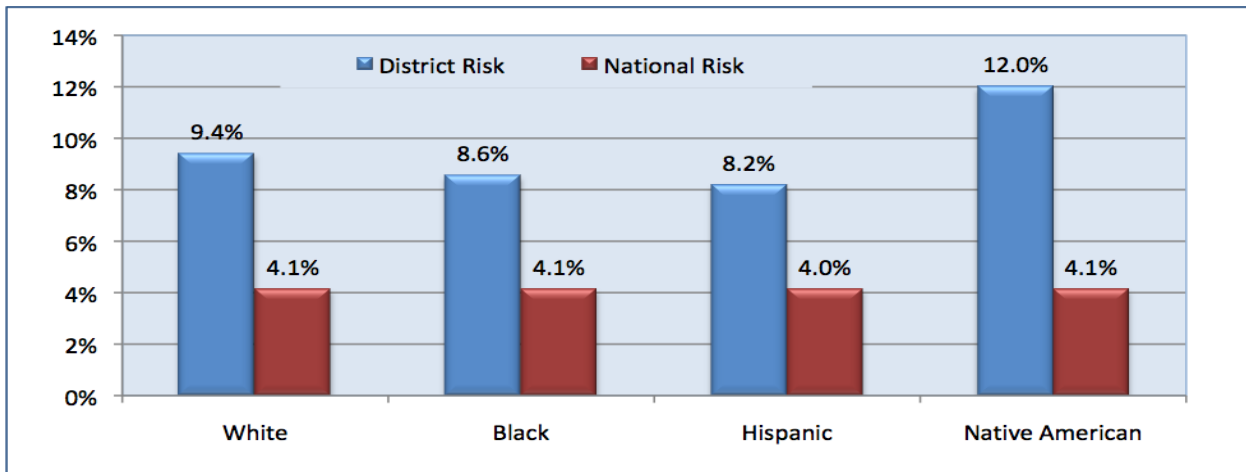
Between 2006 and 2009, the likelihood of being identified as having learning disabilities (LD) decreased for all racial/ethnic groups in the district. Only Native American students continue to be disproportionately represented, but the likelihood decreased from 3.1 percent to 2.9 percent. (See exhibit 11.)

Exhibit 11. Risk Ratio for the Area of Learning Disabilities (2006-2009)



All four groups are more than 1 percent more likely than their nationwide peers to be identified as LD: White (5.3 percentage points greater than nation), Black (4.5 points greater), Hispanic (4.2 points greater), and Native American (7.9 points greater). (See exhibit 12.)

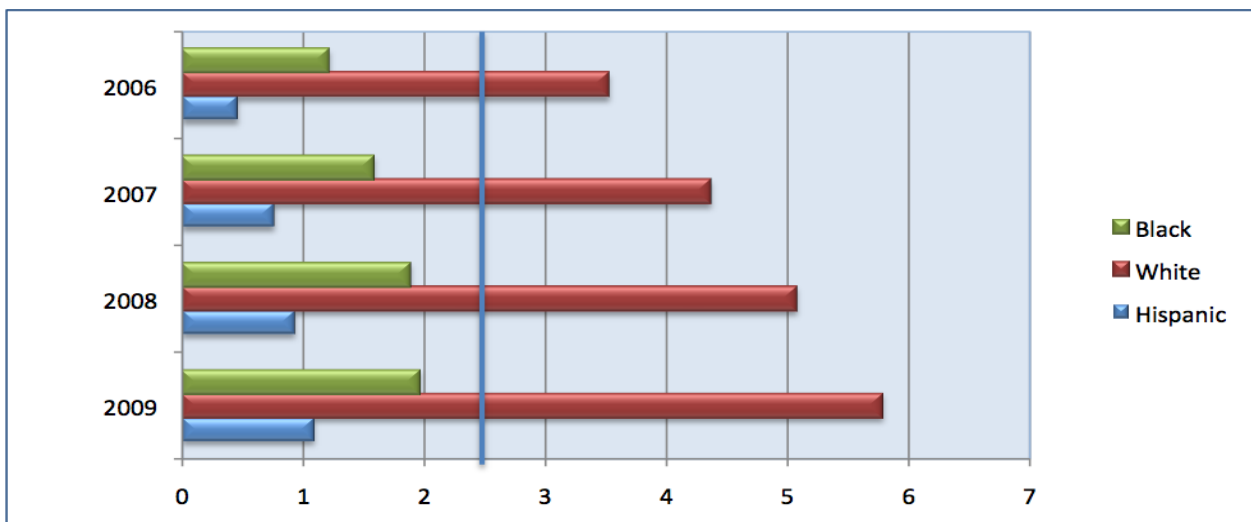
Exhibit 12. Comparison of Percentage of Students Likely to be Identified as LD, 2009 District and 2007 Nation



Autism Spectrum Disorder

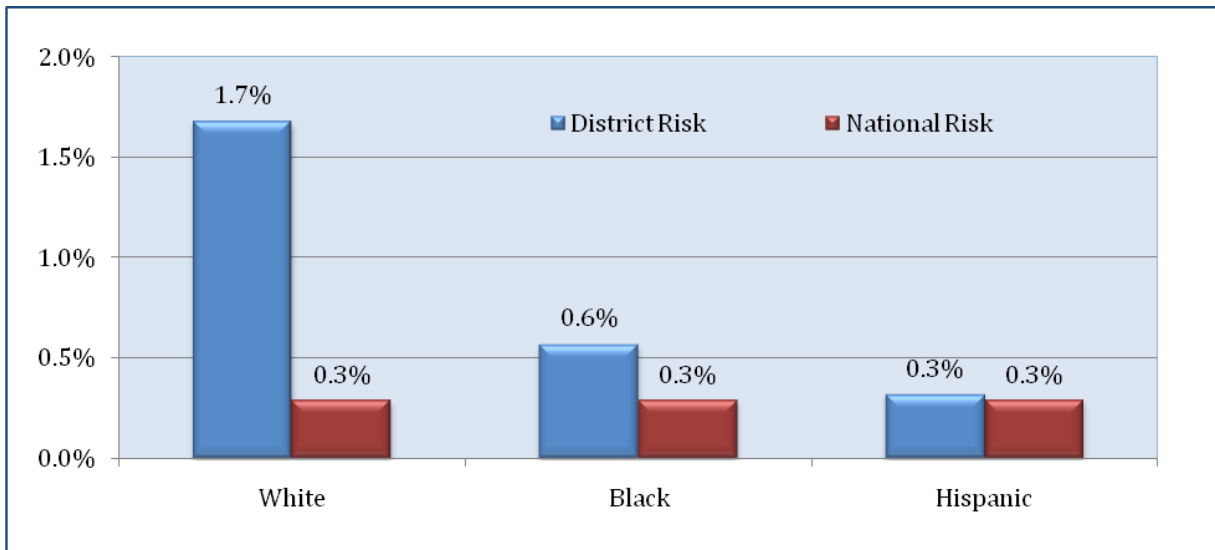
Unlike the other areas discussed, the likelihood of being identified as having autism spectrum disorder (autism) is increasing for White students in the Providence school district (3.52 percent to 5.78 percent). (See exhibit 13.)

Exhibit 13. Percentage of Students Likely to be Identified as Having Autism Spectrum Disorder (PPSD 2006-2009)



The percentage of White, Black, and Hispanic students in PPSD identified as autistic is closer to the national percentage than the other areas examined: White (1.39 percentage points), Black (0.3 points), and Hispanic (no difference). (See exhibit 14.)

Exhibit 14. Comparison of Percentage of Students Recognized as Autistic, District 2009, Nation 2007.



As indicated above in exhibit 14, PPSD identifies a smaller percentage of students as having autism (3.5 percent) than the state (6.1 percent) and the nation (5.85 percent). Consequently, there is a smaller overall difference from the national percentages. However, the difference in PPSD’s proportion of identified White students is much greater than the proportion of Black and Hispanic students.

District Activities to Address Disproportionality

- PPSD is required to use 15 percent of its IDEA funds for students without disabilities to reduce its significant racial/ethnic special education disproportionality. This requirement is based on research showing that early-intervening services in the general education program can effectively reduce disproportionality. According to information provided by the district, these funds have been targeted for struggling general-education students, especially those in the early grades having trouble in math and literacy. To support this effort, a district early-intervening team provides assistance and professional development to school-based evaluation teams, administrators, and teacher-support teams to help develop and implement practices consistent with multi-tiered response-to-intervention (RTI) processes. Furthermore, a group of special educators in PPSD are providing intensive reading intervention to general education students. In addition, the special education office provides professional development for school psychologists and social

workers on the implementation of the multi-tiered approach to supporting students with challenging behaviors.

- Although special education administrators collaborate with RIDE on the issue of disproportionality, it was reported to the team that PPSD general-education representatives have not participated.

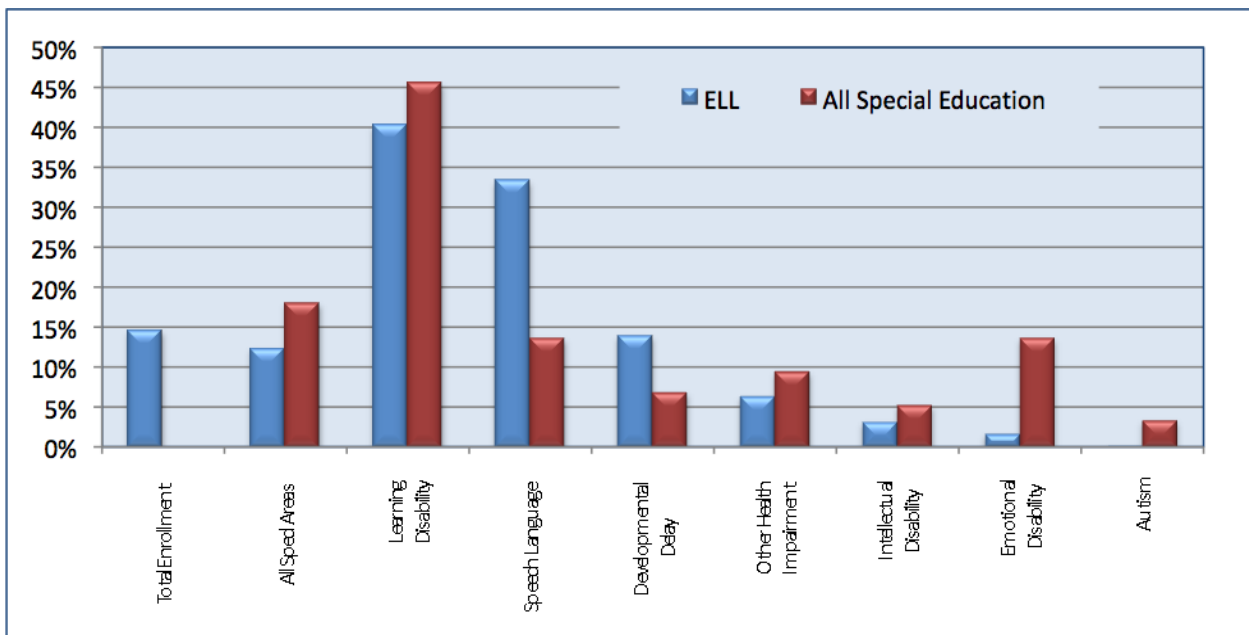
English Language Learners

Of all students in PPSD who are English Language Learners (ELL), 12.4 percent receive special education services. This percentage is proportionate to the 14.7 percent of PPSD students who are ELL, and less than the district’s overall disability rate of 18.1 percent.

However, among students with disabilities, a higher percentage of ELL students receive speech/language services than do all students with disabilities (33.4 to 13.7 percent), and a higher percentage of ELL students are identified as developmentally delayed (14 to 6.9 percent).

On the other hand, ELL students are represented at a much lower level in the areas of ED (1.7 to 13.7 percent) and autism (0.2 to 3.4 percent). ELL students with disabilities are represented in the area of LD at a somewhat smaller rate, compared with all students with disabilities (40.3 to 45.6 percent). (See exhibit 15.)

Exhibit 15. Representation of ELL Students in the Area of Special Education



Evaluation Practices

Early Intervening Team

The early intervening team in PPSD works with school-based evaluation staff members to provide recommendations, guidance, and training to help them understand and implement comprehensive assessments to identify students with ED and/or intellectual disability. This action was taken in response to internal monitoring that found a lack of comprehensive assessments in some cases. It appears that this approach has been having some success in that PPSD has significantly reduced racial/ethnic disproportionality in the area of intellectual disabilities and reduced disproportionality somewhat in the area of ED.

New LD Eligibility Requirements

Since September 1, 2010, Rhode Island school districts have been required to use a process based on student responses to scientific, research-based interventions (i.e., response to intervention or RTI) to determine if the student has a disability and is eligible for special education services. In general, RTI is used to determine if a student has made sufficient progress after the provision of intensive intervention. By state rule, this process must be used for middle and high school students beginning September 1, 2011.

During the 2010-2011 school year, the special education office provided training on RIDE's eligibility guidance to principals, coaches, and the teaching and learning team. However, decisions on eligibility must be based on an effective model of RTI delivered systemically and comprehensively throughout the school district. Otherwise, there is insufficient data upon which eligibility teams can make their determinations. More information about the district's use of RTI and the extent to which it is being effectively implemented is discussed in section C below.

ELL and Disability

Focus group members expressed concern that school-based personnel were not sufficiently knowledgeable about the difference between language acquisition for ELLs and how such acquisition is considered when assessing a possible speech/language impairment and/or learning disability. Such knowledge is necessary for both special and general educators who do not have certification or knowledge in English as a Second Language (ESL). In addition, there is concern in PPSD about a lack of valid and reliable tools for assessing language acquisition for children three to five years of age.

Another point that may help explain the high percentage of ELL students with disabilities who are identified as having a speech/language impairment is the fact that, in the past, ELL students have automatically exited from language-support services after three years, even though they may not have attained adequate language acquisition skills. Students may have been provided speech/language services through the special education process to

compensate for the effects of this practice. In any case, this policy changed during the 2010-11 school year.

The district’s practice of exiting ELLs with disabilities before they had sufficiently strong command of English to perform successfully in mainstream classes is, in part, a direct consequence of RIDE's regulations and guidance. The memorandum on *State-Defined Required English Language Instructional Program Exit Criteria* from RIDE's chief of instructional, assessment, and curriculum and chief of accelerating school performance requires strict adherence to the three-pronged criteria for exiting ELLs, **except** for ELLs with disabilities. The exit criteria for ELLs with disabilities impose a substantially lower threshold related to English language acquisition and appear to increase the relative weight of the IEP and the IEP team. The table below compares the two exit criteria:

Exit Criteria for ELLs	Exit Criteria for ELLs with Disabilities
<p>1. Student Achievement Cutoff scores: ACCESS for ELLs: Literacy Composite score of ≥ 4.5 and Comprehension Composite score ≥ 5 OR NECAP Reading Score \geq Level 3</p>	<p>1. Student Achievement: ACCESS for ELLs: Student's overall composite language proficiency score has not increased more than 10 percent total over the most recent three testing cycles</p>
<p>2. Any three of following (other assessments and teacher recommendations):</p> <ul style="list-style-type: none"> • Passing grades in all core content classes (report card), or • ESL/bilingual education teacher recommendation, or • At least <u>two</u> general education core content teacher recommendations, or • At least <u>three</u> writing samples demonstrating skill not more than one year below grade level, or • Score on a district reading assessment not more than one year below grade level as defined by the publisher or the district 	<p>2. Teacher recommendations:</p> <ul style="list-style-type: none"> • The IEP Team, with input from an ESL/bilingual education professional, recommends exit
<p>3. Students in grades 1-12 can exit (students in K are not eligible for exit)</p>	<p>3. IEP and ELL program participation--</p> <ul style="list-style-type: none"> • Student has an IEP, and • Student has been continuously enrolled in an ESL/bilingual education program for more than five years

The table shows that fewer and lower thresholds on achievement measures need to be met in order to exit ELLs with disabilities. Only ACCESS scores are reviewed for ELLs with disabilities whereas NECAP, class grades, writing samples, and reading assessments would be considered for ELLs without disabilities. Furthermore, the requirement on the ACCESS test does not involve a cutoff score denoting proficiency but rather “lack of progress” on the

assessment. The state criteria for exiting ELLs with disabilities appear predicated on a student's making "no further progress" in English language attainment.¹¹

Although PPSD has improved on RIDE's requirements, the mandates still do not include explicit achievement criteria and leave much of the interpretation to the school-based teams. If staff members are unable to distinguish between learning disabilities and language acquisition signposts, as reported to the team, the fairly loose criteria may be resulting in the premature exit from the ELL program of ELLs with disabilities.

The PPSD Office of ELLs creates a list of the "eligible pool of ELLs with disabilities" based on the RIDE criteria described in the table above. The list is sent to the schools to be reviewed by the school-based teams, which must include at a minimum an ESL/bilingual education professional and a special education supervisor or special education teacher. In order to make a recommendation for reclassification, the team reviews not only ACCESS for ELL data but also formative and summative assessment data and the personal learning plan (PLP). (See ELL Strategic Support Team recommendations.)

Psychiatric Evaluations

PPSD contracts with two psychiatrists for about \$60,000 per year to conduct evaluations of all students believed to have autism or ED and who need special education services. Although assessment staff interviewed during focus groups indicated that state regulations required such assessments, PPSD's two special education directors expressed their understanding that such medical evaluations were not required but staff members consider these evaluations to be best practice and necessary. None of the Council's team was aware of any protocol used by other districts that require psychiatric evaluations as part of the assessment process. Furthermore, the requirement for an additional assessment may add unnecessary delays to the evaluation process, a process that is discussed below.

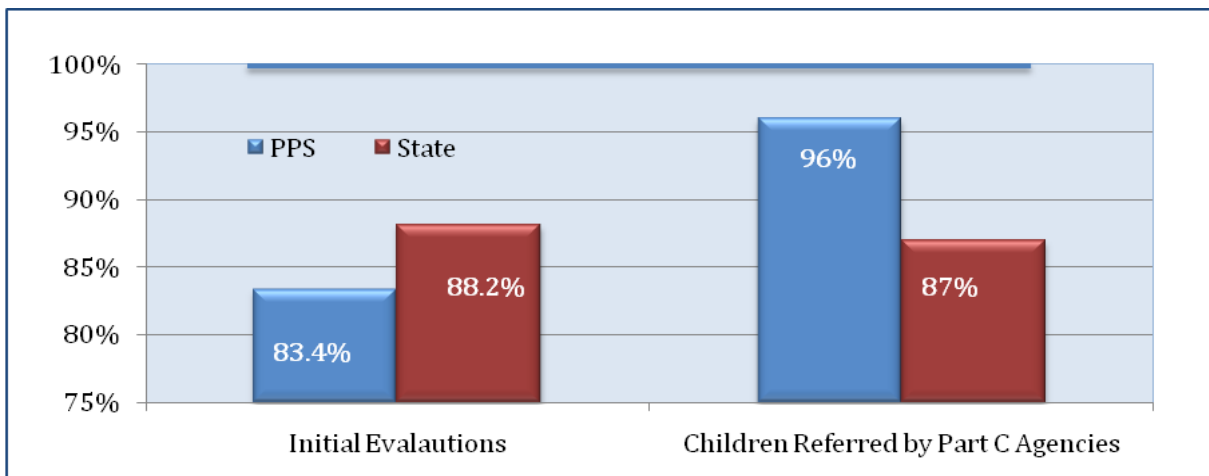
Timely Evaluations

The timely completion of evaluations is another important aspect of the special education process. RIDE monitors this exercise in two ways through its state performance plan: Indicator 11 measures timely completion of initial evaluations and indicator 12 measures the extent to which children referred by early intervention agencies prior to age 3 are evaluated and provided IEP services by their third birthday. Both outcomes have a federally required target of 100 percent.

¹¹ September 3, 2010 memorandum to district superintendents from Rhode Island Board of Regents, Department of Elementary and Secondary Education, Chief of Instruction, Assessment, and Curriculum and Chief of Accelerating School Performance. Subject: State-Defined Required English language Instructional program Exit Criteria.

According to information provided by the district, 71.5 percent of initial evaluations were completed in a timely manner. However, in its February 1, 2011 submission to the U.S. Office of Special Education Programs (OSEP), RIDE reported the district as having a higher performance rate (83.4 percent). In either case, the district's performance was timelier than the state's 88.2 percent. For children referred by Part C agencies, PPSD's 96 percent timeliness rate exceeded the state's 87 percent. For both indicators, the district's performance improved from the previous year. (See exhibit 16.)

Exhibit 16. Timely Evaluations (2008-09)



Every quarter, PPSD submits a report to RIDE showing its progress in meeting indicator 11's initial evaluation timeliness requirements. Based on its April 5, 2011 report, the district's rate for the second quarter (ending December 31, 2010) was 89 percent. The rate for the third quarter (ending March 30, 2011) was 94 percent. Under the district's compliance plan, district special education supervisors and specialists review noncompliant cases each week, discuss data with teams of qualified professionals, and address relevant issues. However, for a variety of reasons that will be discussed more fully in section D, the district is not fully utilizing real-time electronic data and reporting capability to track the issue.

Summary of Positive Observations, Concerns, and Recommendations on Eligibility to Receive Special Education Services

Identification of Students Eligible to Receive Special Education Services

The following are positive observations, areas of concerns, and recommendations to improve the identification of students eligible to receive special education services in the Providence Public School District.

Positive Observations

- ***Special Education Administrative Support.*** Focus group members indicated they believed the district's special education administrators did a "wonderful job" helping them manage the evaluation process.
- ***More Comparable Special Education Rates.*** The district has recognized its high percentage of students identified as eligible for special education services and has implemented a number of strategies to address the needs of students with academic and behavioral challenges within the general education context. As a result, the percentage of students receiving special education services decreased from 19.7 percent in 2006-07 to 18.8 percent in 2010-11.
- ***Reduced Disproportionality.*** PPSD has reduced the extent to which various racial/ethnic groups of students are disproportionately represented in special education generally and in the specific areas of intellectual disability, ED, and LD. Furthermore, RIDE has determined that the district's disproportionate representation was not the result of inappropriate identification. Finally, the district identifies ELL students as having disabilities at rates that are comparable to PPSD's overall ELL total student population and the national special education population.
- ***More Timely Evaluation Completion Rates.*** Although PPSD has not reached the 100 percent target for timely evaluations required by RIDE's state performance plan, the district's timeliness rate has increased for initial evaluations and, at 96 percent, is almost at the target for children referred by Part C early-intervention agencies.
- ***Evaluation Process Training and Support.*** The special education office has developed and implemented specific procedures for evaluation teams to diagnose students having an intellectual disability and ED, and it has provided professional development on new regulations for identifying a child with a learning disability. In addition, the special education office has provided multiple training sessions on providing early intervening services and on new LD eligibility criteria to special educators, principals, and clinical staff, e.g., psychologists, social workers, etc. In addition, the special education office is working with Brown University to provide training on differentiated diagnosis for students who are ELL. The district's early-intervening team works with school-based evaluation teams, providing recommendations, guidance, and training to help them understand and implement comprehensive assessments to identify students with ED and/or intellectual disabilities.

Areas of Concern

- ***High Percentage of Students Evaluated Are Not Eligible.*** The percentage of students referred for an evaluation to determine eligibility for special education services increased between 2007 and 2010. Compared to previous years, a greater percentage of referrals are

currently not approved for further evaluation than before, and a smaller percentage of those assessed are found to have a disability that requires special education services. District staff indicated concern, however, that these data were not accurate because the PPSD student information system does not capture student eligibility decisions made over the summer or the following school year. Consequently, the district does not have good information on this issue.

- ***Comparatively High Special Education Prevalence.*** A much larger percentage of PPSD students (17.1 percent for students ages 6-21) are found eligible to receive special education services than the national average (13.4 percent). Furthermore, a greater percentage of students are receiving special education in the areas of LD and ED than in the state and the nation.
- ***Disproportionate Representation Continues.*** Although PPSD’s overall racial/ethnic disproportionality rates have decreased over time, they have increased for autism, and the district continues to have disproportionate representation in the following areas: all special education (Native American), ED (White and Black), LD (Native American), and autism (White). Although special education administrators have collaborated with RIDE on the issue of disproportionality, it was reported to the team that PPSD general education staff members have not participated. Regardless of the reasons for this lack of participation, it is essential that the issue of disproportionality and the leadership of efforts to reduce the impact of disproportionality reside in leadership responsible for general curriculum and instruction and the district at large. In the absence of such leadership, RTI may continue to be viewed as a “pathway to special education.”
- ***Need for Better Differential Diagnosis.*** Focus group members expressed concern that school-based staff members were not sufficiently knowledgeable about the difference between language acquisition for ELL and how such acquisition affects a possible speech/language impairment and/or learning disability. Furthermore, there is concern that students have been determined to have a disability in order to receive speech/language services to compensate for a lack of English language support. Staff members were also concerned about the lack of valid and reliable tools for assessing language acquisition for three- to five-year-old children.
- ***Categorical Psychiatric Evaluation Practice.*** PPSD contracts with two psychiatrists for about \$60,000 per year to conduct evaluations of all students believed to have autism or ED and to need special education services, even though this practice is not required by federal or state law. The Council team is not aware of other districts that employ this practice.
- ***Insufficient Use of Data to Support Timely Evaluations.*** Although its performance is improving, the district has not met the state performance-plan target of 100 percent for timely initial evaluations for children referred from Part C early intervention agencies.

Recommendations

1. **Improve consistency and appropriateness of eligibility determinations across the district and ensure staff members are held accountable for doing so.**
 - a. **Identify all disability areas in which it is much more likely (e.g., 1 standard deviation) that a PPSD student will be found to have a disability than other students in the nation.** Consider working with the National Association of School Psychologists or another credible organization or consultant (1) to review the district's current criteria for all disability areas to ensure that they are sufficiently specific, measurable, and operational and (2) to advise local assessment teams. As part of this process, review a sample of recent evaluations that produced special education eligibility determinations in these areas to (1) identify areas of concern that should be reflected in the criteria, (2) provide professional development on any revised eligibility standards, and (3) promote appropriate decision-making. (See section C regarding RTI for additional recommendations relevant to this issue.)
 - b. **Improve the special education referral and screening process.** Review *accurate* data to identify any patterns in the referrals that (1) were determined not to be appropriate for an evaluation and (2) that resulted in evaluations that did not produce an eligibility determination. Review a variety of student files in both categories reflecting these trends to identify any part of the referral and screening process that would benefit from revision. Based on this review and any subsequent procedural revisions, provide training to principals and relevant staff.
 - c. **Use data to initiate improvement plans for the referral and evaluation process, and monitor outcomes.** Produce *accurate* quarterly reports showing by school the number and percentage of students (1) referred for a special education evaluation, (2) screened to proceed to an evaluation, and (3) determined to be eligible for services, along with the disability area. Disaggregate the data by school, race/ethnicity, and ELL. For any school (with a sufficient number of students) in which (1) fewer than 85 percent of students evaluated were found eligible for services and/or (2) the disability rate is above a level of expectation established by the district, review the evaluation data with the relevant school staff to determine how the school's referral, screening, and evaluation process could be improved. Based on this determination, involve the principal in setting expectations for future actions and monitoring their outcome. Disseminate data through the chief academic officer to relevant PPSD administrators with responsibility for supporting school instruction and discuss how various departments can reinforce and support the actions to be taken by the schools.
 - d. **Improve the evaluation process for students who are ELL.** With relevant stakeholders, including the ELL director, research evidence-based practices for identifying and evaluating students who are ELL with suspected special education/related services needs to ensure that language acquisition issues are not

mistaken for a special education need or mask such a need. As part of this process, consider the ELL expertise that is available in schools and how it can be accessed to support this process. Also, consider how schools lacking such expertise can be assisted in supporting any ELL requiring additional support. Based on this information, initiate professional development activities to disseminate relevant information. In addition, see appendix A for information provided to the Council by various ELL experts regarding the use of valid and reliable tools for assessing language acquisition for three- to five-year-old ELLs.

- e. ***Revise process for use of psychiatric evaluations.*** Establish a written protocol regarding standards to be applied on a case-by-case basis for recommending a psychiatric evaluation to determine if a student has or continues to have an emotional disturbance or autism. The protocol should be specific enough so that it produces a change from the current practice of utilizing a psychiatrist for every evaluation. Following dissemination and training on the protocol, monitor its application.

Section B. Performance of Students with Disabilities

This section addresses the performance of students receiving special education services with respect to academic performance and their graduation and dropout rates. In addition, the areas of suspensions and attendance are addressed to see whether students with disabilities receive out-of-school suspensions or have unexcused absences at inordinate rates, which affect their ability to be in school and have access to instruction.

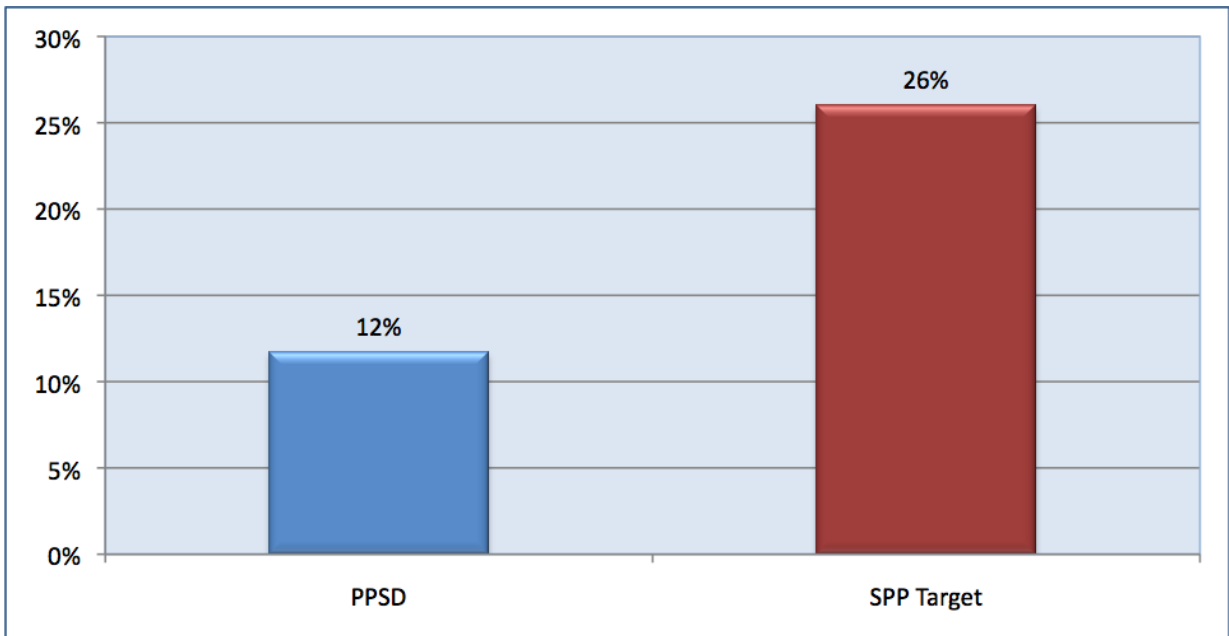
Academic Performance

The subsections below describe the reading and mathematics performance on regular and alternative assessments of students receiving special education services.

Comparison of Academic Performance of PPSD Students with Disabilities to State Targets

The state's February 1, 2011 annual performance report shows a 12 percent overall proficient or above rate for students with disabilities in 2009-2010, a level that did not improve from the previous year. This outcome is 14 percentage points below the state performance plan (SPP) target of 26 percent. (See exhibit 17.)

Exhibit 17. Percentage of Students with Disabilities Scoring At Least Proficient, 2009-10



Rhode Island established individual grade and content area performance targets. As shown in the exhibits below, students receiving special education services perform substantially below SPP targets at all grade levels in both reading and math based on the New England Common Assessment Program (NECAP). (See exhibits 18 and 19.)

Exhibit 18. Reading Performance

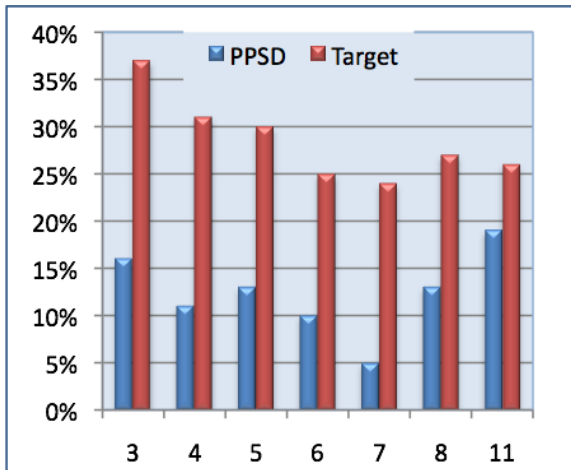
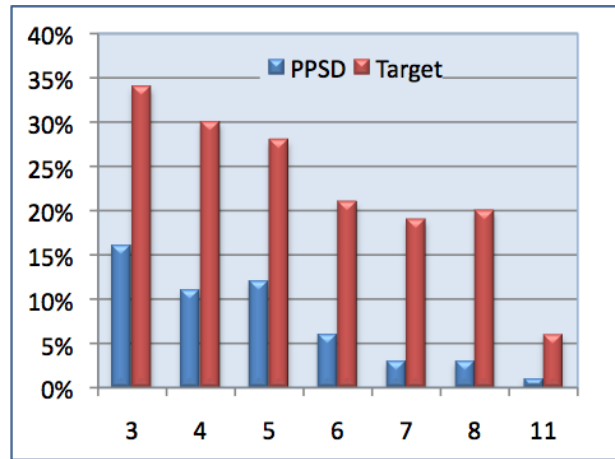
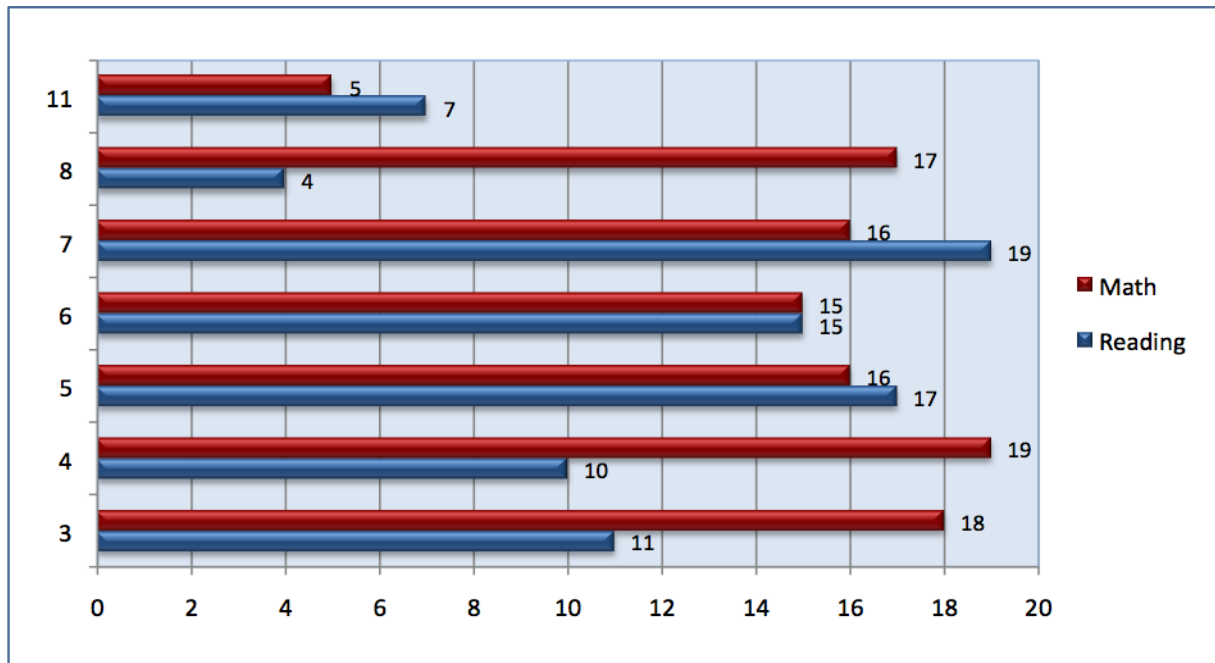


Exhibit 19. Math Performance



Comparing the percentage of PPSD students with disabilities who scored proficient or above to the state proficiency target percentage, the gap was in grade 7 (19 percentage points) and the smallest gap was in grade 8 (4 percentage points). In math, there was a 19-point difference at grade 4 and a 5-point difference at grade 11 in 2009-10. PPSD students are closer to the state target in math than reading at grades 3, 4 and 8, and closer in reading than math at grades 5, 7 and 11. Their point differential is the same at grade 6. (See exhibit 20.)

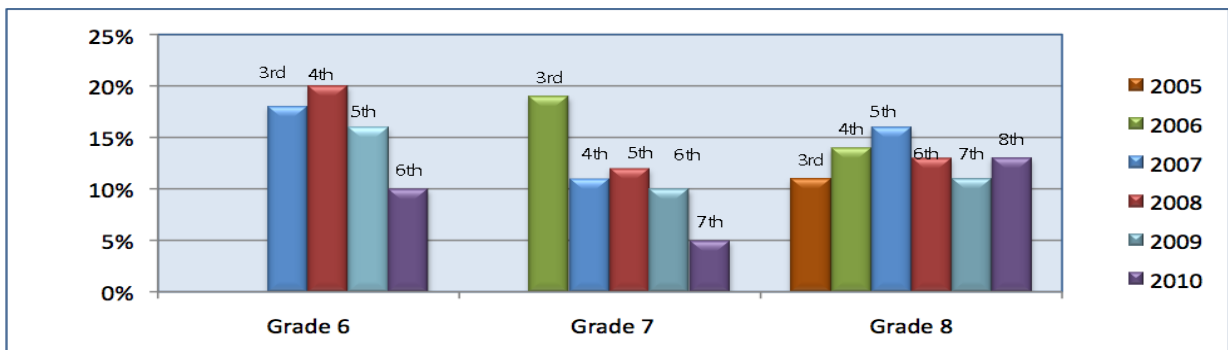
Exhibit 20. Percentage Point Differences Between PPSD Students with Disabilities Scoring At Least Proficient and State Targets by Grade in Reading and Math, 2009-10



Scores of Students with Disabilities as They Proceed from Grade to Grade

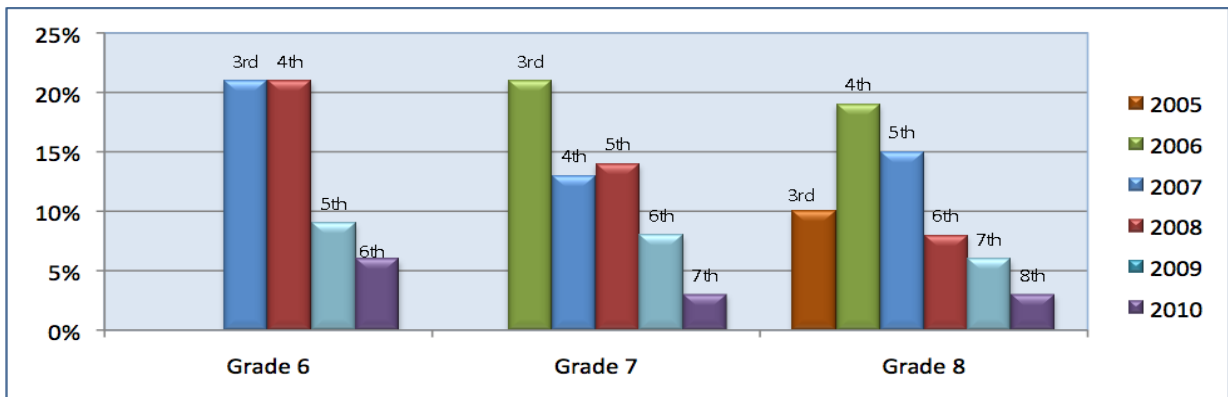
Although not precise, exhibit 21 below shows the percentage of PPSD students with disabilities who scored at or above proficient levels as they moved from grade to grade.¹² In reading, a smaller percentage of sixth- and seventh-grade students scored proficient and above than they had done in third grade. Interestingly, current eighth graders scored at about the same level across the years, with their highest performance rate in fifth grade (2007). The degree to which the test is well articulated from grade to grade also affects these numbers.

Exhibit 21. NECAP Reading: Current Grade and Scores (Proficient and Above) for Prior Grades



Also, in math, a much smaller percentage of students performed at or above proficient levels in their current grade than they did in prior grades. (See exhibit 22.)

Exhibit 22. NECAP Math: Current Grade and Scores (Proficient and Above) for Prior Grades



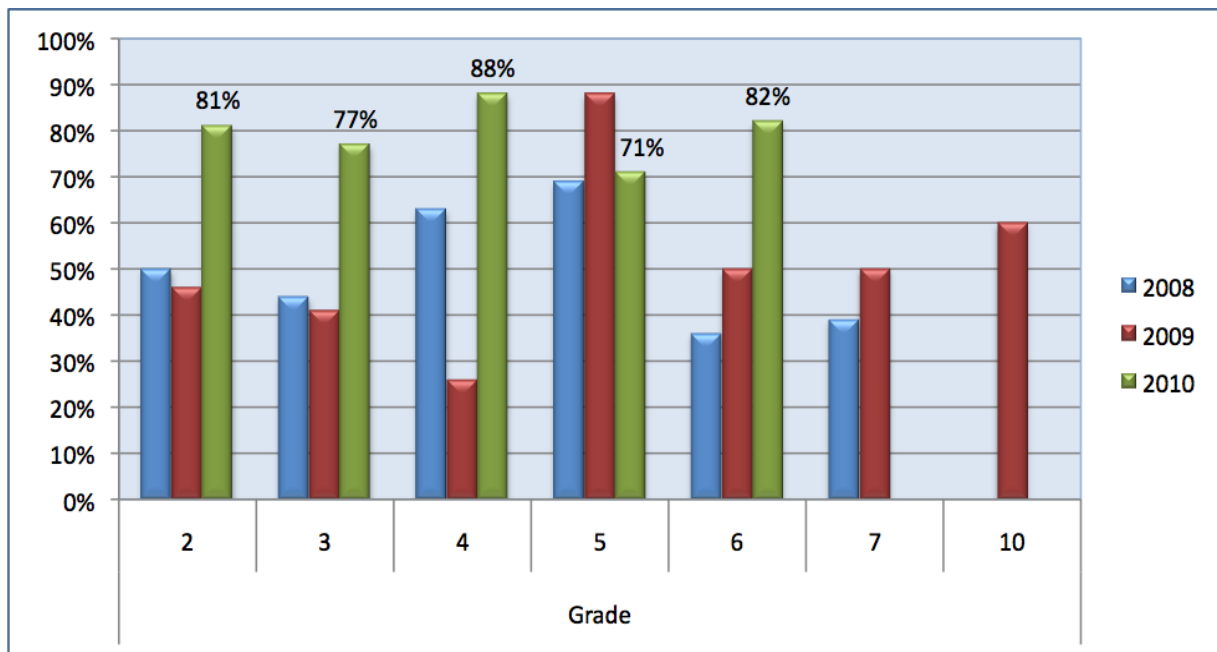
¹² These years represent students in prior grades, e.g., for sixth graders in 2010, most would have been in third grade in 2007, in fourth grade in 2008, and in fifth grade in 2009. Because the scores are grade- and not student-based, the exhibit gives an approximate and not exact reflection of the progression of student performance across the years.

Alternate Assessments

As is the case with other school districts, PPSD students with the most significant cognitive disabilities take statewide alternative assessments. As exhibits 23 and 24 show, a much higher percentage of students with significant cognitive disabilities scored proficient or above on alternative assessments than they did on the regular assessment. However, the high performance may reflect the portfolio nature of Rhode Island’s alternative assessment and the skills of the teachers who administer it.

In reading, a higher percentage of students (above or near 80 percent) in grades 2, 3, 4, and 6 who took the alternative test scored at or above proficient in 2010 than in previous years. In the fourth grade, reading performance jumped 62 percentage points to 88 percent, but fifth grade scores fell by 17 points. (See exhibit 23.)

Exhibit 23. Reading: 2008-2010 Rhode Island Alternate Assessments¹³

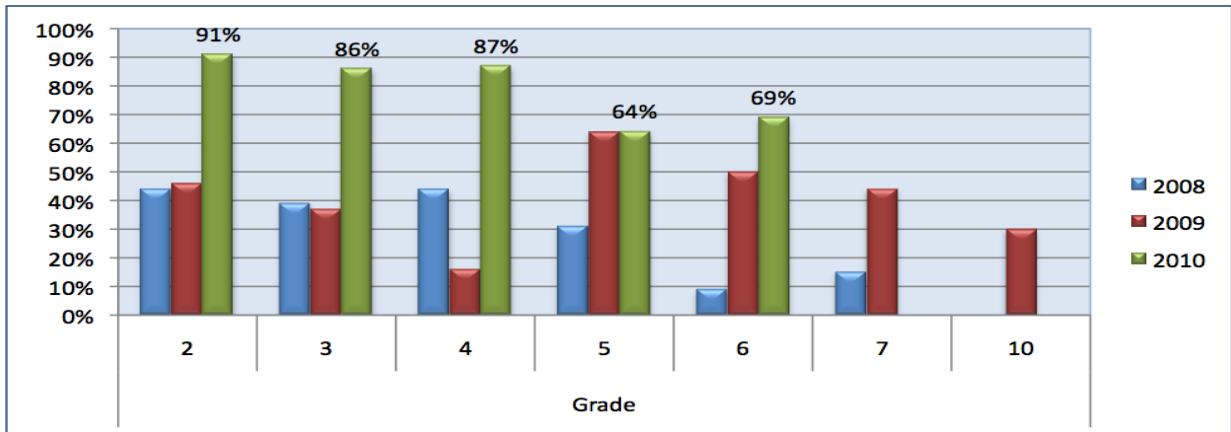


Math data showed even greater improvements in student performance. Proficient and above rates ranged between 86 percent and 91 percent in grades 2, 3, and 4, indicating significant increases over the prior year. As with reading, the percentage of fourth graders

¹³ Years with no reported scores reflect a number of students that does not meet the minimum reporting requirement. Grades for alternate assessment testing occur during the actual year of instruction whereas NECAP tests on the prior year's instruction, e.g., grade 3 test reflects grade 2 instruction.

meeting this standard jumped 71 percentage points. While fifth graders' performance did not decline, it did stay the same as the previous year. (See exhibit 24.)

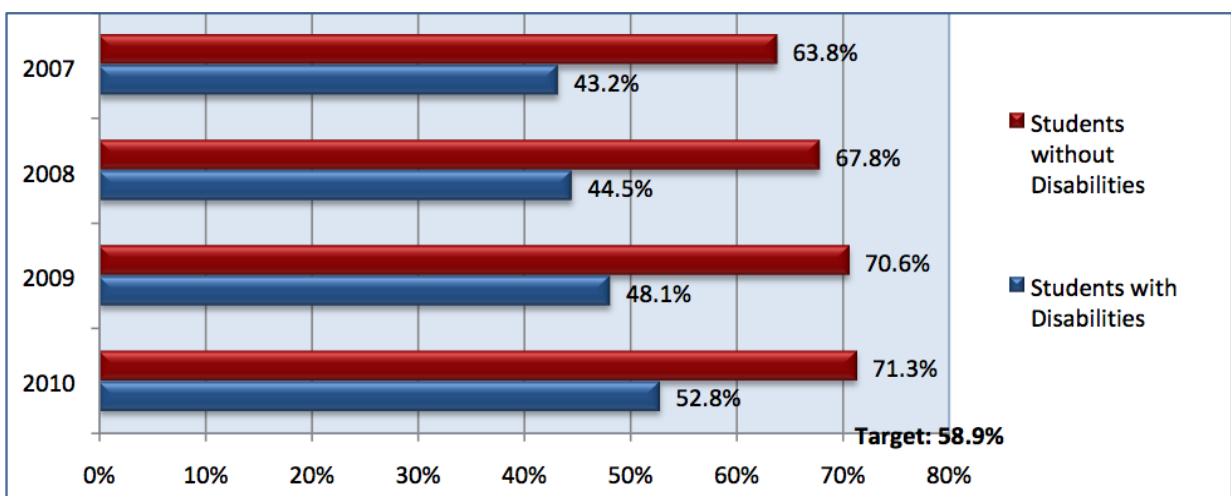
Exhibit 24. Math: 2008-2010 Rhode Island Alternate Assessment



Graduation and Dropout Rates

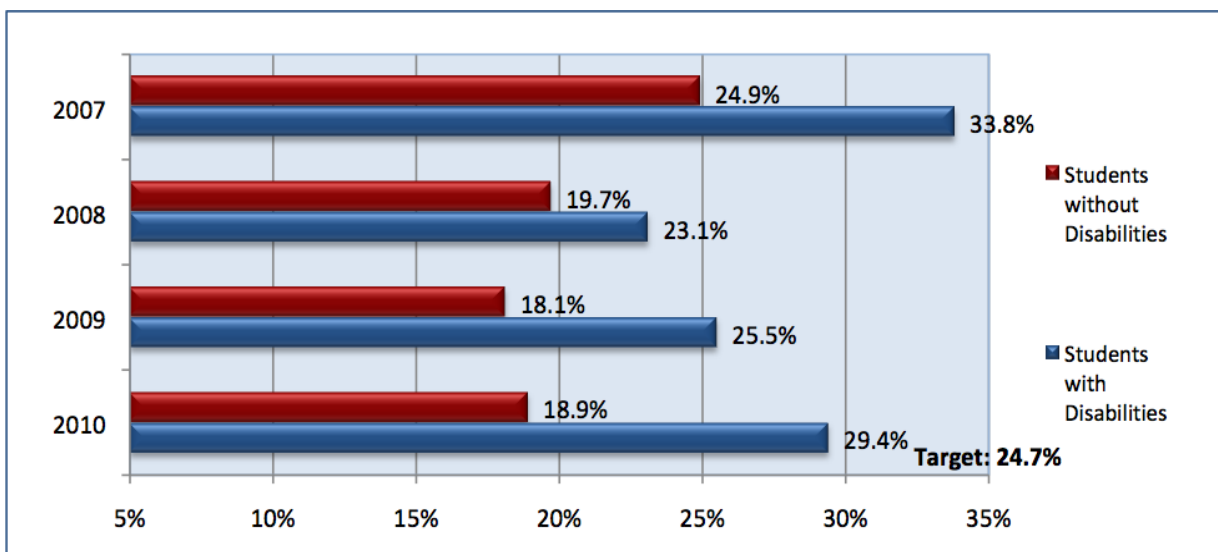
The rate of students with disabilities graduating from high school in four years with a regular diploma increased from 43.2 percent in 2007 to 52.8 percent in 2010, but a large gap exists between the graduation rates of PPSD students with and without disabilities. Although the gap decreased by 2.1 percentage points between 2007 and 2010, the percentage of students with disabilities graduating in 2010 was 18.5 points below their nondisabled peers. Nevertheless, PPSD was within 6.1 percentage points of the state performance-plan target of 58.9 percent. (The target increases one percentage point each school year.) (See exhibit 25.)

Exhibit 25. Four-Year Graduation Rate: Students With and Without Disabilities



The special education dropout rate in 2010 (29.4 percent) decreased from the 2007 level of 33.8 percent. However, between 2007 and 2010, the gap between students with and without disabilities increased from 8.9 to 10.5 percentage points. Furthermore, the 2010 dropout rate of 29.4 percent was higher than the rates in 2008 (23.1 percent) and 2009 (25.5 percent). Although district data show that the dropout rate in 2010 (29.4 percent) was close to the 24.7 percent SPP target, RIDE reported that PPSD’s 2009-2010 rate was 34.7 percent, up from the previous year.¹⁴ Although the district’s credit recovery program might help to increase graduation rates and reduce dropout rates, special education services apparently are not available for this activity. (See exhibit 26.)

Exhibit 26. Dropout Rate: Students With and Without Disabilities



Out-of-School Suspensions and Unexcused Absences

Access to learning is critical for improved student performance. During the 2009-2010 school year, 75 percent of students receiving special education services received no out-of-school suspensions (suspension) for a disciplinary infraction, compared to 87.4 percent of their nondisabled peers.

Exhibit 27 below shows the percentage of students with and without disabilities who received a suspension by the number of days suspended. Generally, these data show that students with disabilities are suspended at an increasingly higher rate than their nondisabled peers as the number of suspended days increases from 1 to 10 days. However, the district

¹⁴ The link for accessing Rhode Island’s public reporting information, which details the performance of each LEA on the targets in the SPP, is: https://www.eride.ri.gov/eride2K5/SPED_PublicReporting/.

suspended only 10 students for more than 10 school days in 2009-10. Two of these students received special education services and were suspended for 11 cumulative days.

Exhibit 27. Percentage of Students With/Without Disabilities Receiving Out-of-School Suspensions, by Number of Days, 2009-2010 School Year

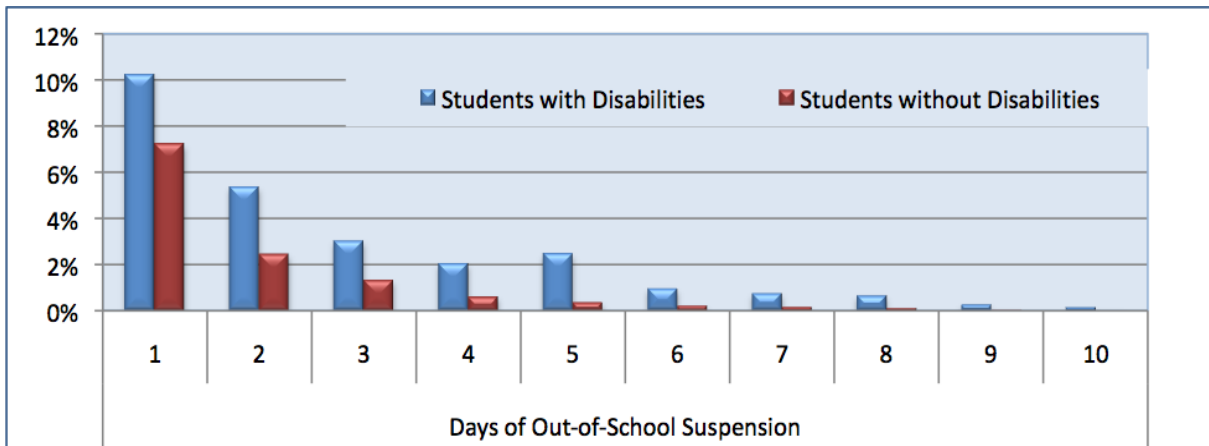
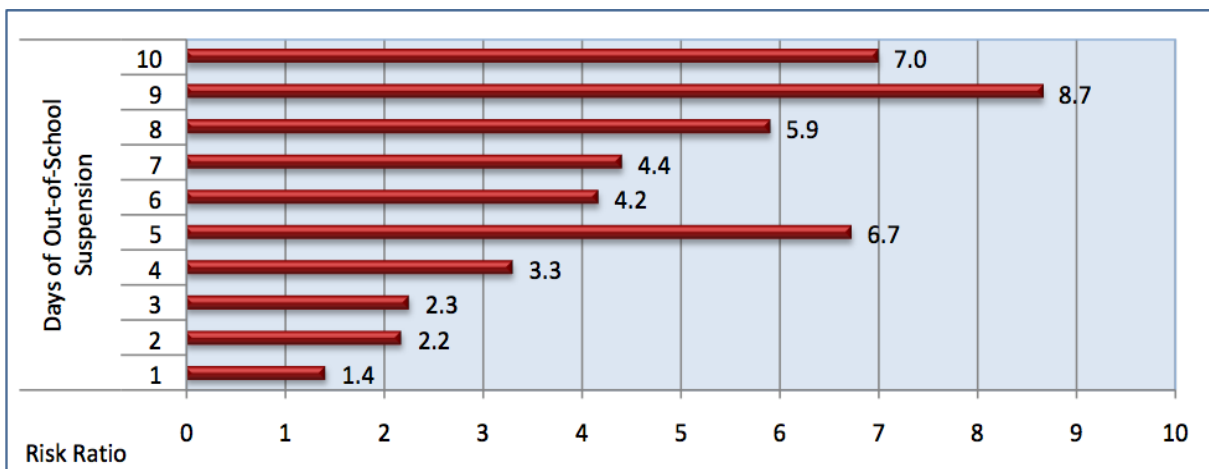


Exhibit 28 shows that, although the number of days suspended is not excessively high, students with disabilities are more likely than their nondisabled peers of being suspended for more days. For example, they are 8.7 times more likely to be suspended for nine days and seven times more likely to be suspended for 10 days.

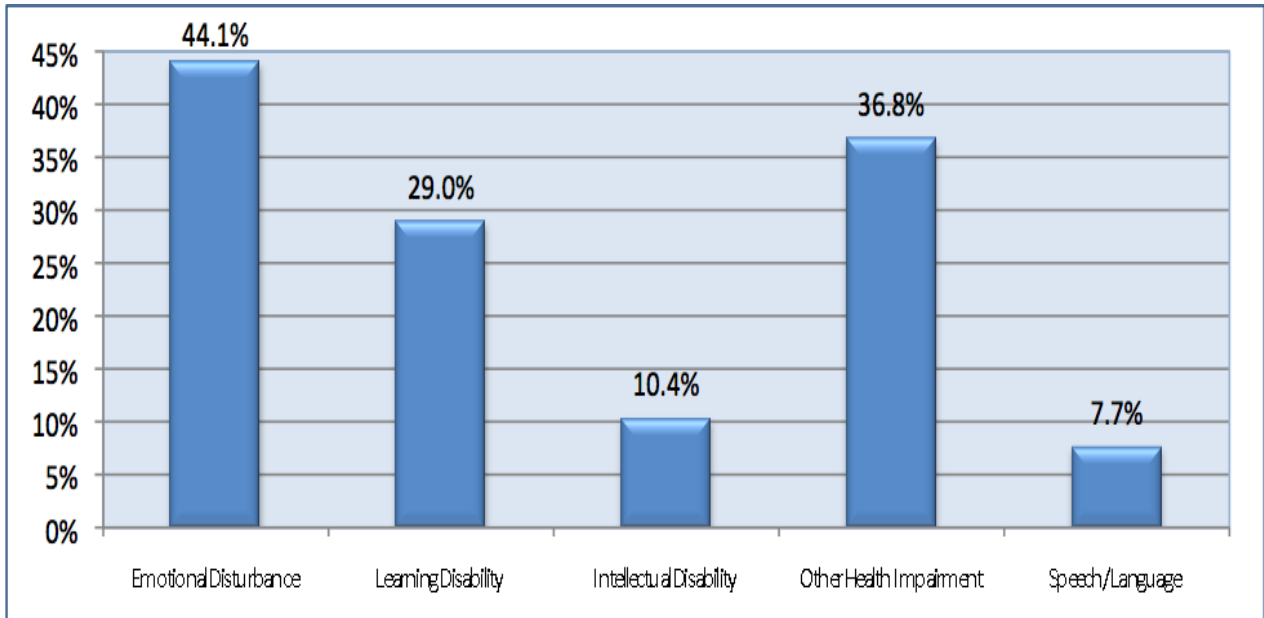
Exhibit 28. Likelihood that Students with Disabilities Were Suspended Compared to Nondisabled Peers, by Days Suspended, 2009-2010 School Year



Most students with disabilities who receive at least one out-of-school suspension have a disability in the areas of ED (44.1 percent), LD (29 percent), or other health impairment (36.8 percent). Only nine total students with autism, developmental delay, or traumatic brain

injury were suspended. And no students with a hearing impairment, multiple diagnoses, orthopedic impairment, or visual impairment were suspended. (See exhibit 29.)

Exhibit 29. Percentage of Students by Disability with One or More Out-of-School Suspensions, 2009-2010 School Year

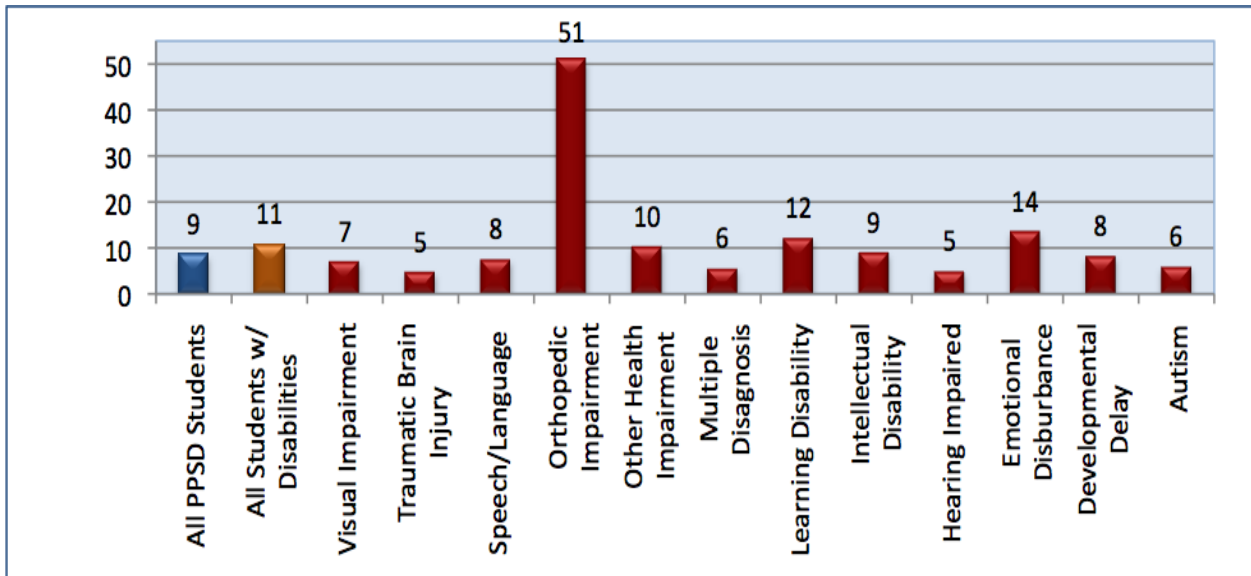


PPSD only suspended two students with disabilities for more than 10 days. As a result, RIDE found that the district did not have a significant discrepancy in the rate of suspensions and expulsions of greater than 20 days in a school year for students with disabilities or a discrepancy by race or ethnicity. Thus, PPSD met the SPP targets for indicators 4A and 4B in these areas.

Unexcused Absences

According to some focus group participants, student absenteeism is one of the biggest challenges to student performance. Exhibit 30 below shows that students with disabilities do not have a much higher average number of days of unexcused absences than other PPSD students (11 and 9 days, respectively). However, such unexcused absences on top of excused absences affect teaching and learning.

Exhibit 30. Students with Disabilities, Average Days of Unexcused Absences



A district representative explained that data in the area of orthopedic impairments, which indicated an average of 51 days of unexcused absences, reflect only two students. One had 85 days of unexcused and 0 excused days recorded, and the second student had 17 unexcused and 0 excused absences.¹⁵

Summary of Positive Observations, Concerns, and Recommendations on Student Performance

Performance of Students with Disabilities

The following are positive observations, areas of concerns, and recommendations to improve the performance of students eligible to receive special education services.

Positive Observations

- ***Alternative Assessment Outcomes.*** A much higher percentage of students with disabilities in 2010 scored proficient or above on the alternate assessment than they did on the regular assessment, and scores are increasing dramatically from the previous year in both reading and math in almost every grade.

¹⁵ District personnel suggested that the data may reflect reporting errors. However, it also reflects the consequences of irregular monitoring and the need for correction of possibly incorrect data.

- **Graduation Rates.** The rate of students with disabilities graduating in four years with a regular diploma increased between 2007 and 2010, when PPSD was within 6.1 percentage points of the state performance plan target of 58.9 percent.¹⁶
- **Dropout Rates.** The special education dropout rate decreased from 2007 to 2010 (33.8 percent to 29.4 percent).¹⁷
- **Out-of-School Suspensions.** PPSD suspended only 10 students for more than 10 total school days in 2009-10. Only two of these students received special education services and they were suspended out-of-school for 11 cumulative days. Furthermore, a total of only nine students with autism, developmental delay, and traumatic brain injury were suspended. No students with other disabilities were suspended. These data show that the district does not rely on out-of schools suspensions as a disciplinary tool for students with disabilities.
- **Absences.** Students with disabilities did not have a much higher average number of days of unexcused absences (11 days), compared with all PPSD students (9 days).

Areas of Concern

- **Academic Performance.** RIDE reported that 12 percent of all special education students scored proficient and above in math and reading combined for the 2009-2010 school year. No progress was reported from the prior year. This outcome is 14 percentage points below the SPP overall target of 26 percent. Furthermore, this group performed substantially below the SPP's NECAP targets for math and reading at every grade level. Students were closer to the state target in math than in reading at grades 3, 4, and 8, and closer in reading than in math at grades 5, 7, and 11. Their point differential was the same at grade 6.
- **Graduation Rates.** Some 52.8 percent of students with disabilities graduated in 2010, 18.5 points below their nondisabled peers. Although PPSD was within 6.1 percentage points of the SPP's 58.9 percent target, the target increases one percentage point annually for the next three years. However, there were discrepancies between district and state reporting of graduation rates. This issue, as well as the reporting of dropout rates (see below), is discussed in section D on use of technology and data.
- **Dropout Rates.** Between 2007 and 2010, the gap in the dropout rates between students with and without disabilities increased from 8.9 to 10.5 percentage points. Furthermore, district data for 2010 showed a special education dropout rate of 29.4 percent, higher than the rates in 2008 (23.1 percent) and 2009 (25.5 percent). RIDE, however, reported a higher

¹⁶ Inconsistency between PPSD and RIDE graduation rates is discussed under Areas of Concern.

¹⁷ Inconsistency between PPSD and RIDE special education dropout reporting is discussed under Areas of Concern.

2010 dropout rate of 34.7 but noted that the rate reflected progress over the previous year. The district's credit recovery program could help increase graduation rates and reduce dropout rates, but focus group participants indicated that special education services were not available for this activity.

- ***Out-of-School Suspensions.*** Students with disabilities were suspended at an increasingly higher rate than their nondisabled peers as the number of suspension days increased from 1 to 10. Most students with disabilities receiving at least one out-of-school suspension had a disability in the areas of ED (44.1 percent), LD (29 percent), or other health impairment (36.8 percent). Although the district generally does not suspend these students for more than 10 cumulative days,¹⁸ the percentage of students suspended in the three disability areas was disconcerting.
- ***a. Unexcused Absences.*** Students with disabilities did not have unexcused absences at a much greater rate than other PPSD students (11 and 9 days, respectively), but such unexcused absences on top of excused absences have a negative impact on learning. Furthermore, it does not appear that data are used to track and follow up on unexcused absenteeism as data recording errors were suggested as the reason why one student with disabilities was reported with 85 days and another with 17 days of unexcused absences. Neither student had any excused absences. Regular monitoring of such data would have identified these and other students having excessive absenteeism and enabled appropriate follow-up action.

Recommendations

2. ***Increase the number of freshman year students who are “on track” to graduate.***¹⁹

¹⁸ Two students with disabilities were suspended for 11 days; the district report did not identify their disability.

¹⁹ In a December 2009 report, *What Matters for Staying On-Track and Graduating in Chicago Public Schools: A Focus on Students with Disabilities*, the Consortium on Chicago School Research and the National High School Center found that freshman year course performance—more than background characteristics such as race, gender, socioeconomic status, or prior achievement—predicts which students with disabilities are most at risk for dropping out of high school. Specifically, “on-track” students who accumulate at least five semester-long credits and fail no more than one core course during their freshman year are three to six times more likely to graduate than their off-track counterparts. In addition, the report found:

- Students with emotional disturbances and students without disabilities who entered high school two or more years below grade level had the lowest level of course performance of any group studied;
- Freshman year course performance is a strong predictor of five-year graduation rates for students with disabilities and students who entered high school two or more years below grade level. Despite the utility of absences, grades, course failures and on-track status in predicting graduation rates, the researchers found that, at each level of course performance, students with disabilities and students who entered high school two or more years below grade level were less likely to graduate than their nondisabled peers.
- Higher absence rates are an important factor explaining why students with disabilities fail more classes and have lower grades than students without identified disabilities.

- a. *Identify students “not on track.”*** Initiate a strategy to identify and support all freshman-year students who are “not on track” to graduate, defining “not on track” as students entering high school two or more years below grade level:
- *Use a database* to identify freshman-year students who are not likely to accumulate at least five semester-long credits, likely to fail more than two core courses during the freshman year, and/or have too high absence rates.
 - *Identify and implement research-based strategies* to the extent possible for each student not on track, e.g., mentoring, research-based interventions, and other supports likely to reverse the student’s performance trend. Require principals with high dropout rates (and feeder schools) to work with stakeholder groups to develop targeted plans. See the National Dropout Prevention Center for Students with Disabilities at <http://www.ndpc-sd.org/> for suggestions on research-based practices.
 - *Ensure that credit recovery assistance* is provided for students with disabilities in order to ensure their access to and success in this district program, along with special education and other supplemental aids and services.
 - *Ensure that all students taking standard state assessments access high school courses based on core standards.* As discussed in more detail in the next section, students with disabilities (as well as other students) may require differentiated instruction to access core curricular areas, but they will continue to have low performance rates unless content is taught systematically and comprehensively.
- b. *Identify and support high schools with high dropout rates.*** Identify high schools with dropout rates above the state’s targets, and require principals to collaborate with stakeholder groups to develop targeted plans based on research-based approaches available through the National Dropout Prevention Center for Students with Disabilities. In addition, identify feeder schools and involve principals and staff of these schools to address identified issues proactively.
- 3. *Reduce out-of-school suspensions for students with disabilities.*** Review data from 2009-10 and 2010-11 showing students with disabilities with five days or more of out-of-school or in-school suspensions. Based on this information, join with stakeholders to develop templates for plans (elementary, middle, and high school) with research-based interventions grounded in RTI/PBIS principles. Disseminate the data and templates to relevant district administrators and principals, and require principals to integrate the results into their overall school planning process. Report and disseminate the suspension data every month to determine the extent to which school activities are having a positive effect, and follow up as appropriate. Note that this activity would be relevant also for students without disabilities.

- 4. Generate and distribute monthly reports on unexcused student absences* by school for all students, including those with disabilities, requiring schools to correct any data that appear to be in error. Establish criteria for excessive absences (excused and unexcused) that would require school-based staff to investigate the basis for the absence and provide interventions, such as mentoring and community-based social service support.

Additional recommendations to address the area of academic performance are provided below in section C, Instructional Practices and Support.

Section C. Instructional Practices and Support

This section focuses on the instruction of students who are performing below grade-level expectations in reading and math and who have challenging behavior. The discussion begins with a review of district practices on RTI because of its impact on the appropriateness of identification practices for special education services and the intense supports available for all students. Following the discussion of RTI, the section will focus on the various educational settings in which students with disabilities are educated: (1) classroom instruction in inclusive general-education settings vs. self-contained settings (including those with autism and challenging behavior), (2) instructional support for ELLs with disabilities, (3) the education of students in out-of-district settings, and (4) supports for postsecondary transition activities and services.

Response to Intervention (RTI)

We begin with a summary of PPSD instructional practices that are designed to improve the academic performance and social/emotion well being of all students, including those with disabilities. The knowledge and experience of the Council's team, along with research, show that Individuals with Disabilities Education Act (IDEA) provisions have not led to special-education identification practices that are consistent across the nation, districts, or schools. As a result, districts and schools may have groups of students with similar characteristics, but while some groups are receiving special education services, and other groups are not. RTI, which includes positive-behavior intervention and support (PBIS), is designed to strengthen general education and produce more appropriate special-education identification, and it is a critical tool for improving classroom instruction for all students.

Research and Relevance to Determination of Special Education Need

As indicated above, almost half (47 percent) of PPSD students receiving special education are identified as having LD, an especially high proportion, compared with the state's 41 percent and the nation's 37 percent. Generally, it is estimated that 80 percent of students are identified as LD based on reading difficulties. However, research indicates that identifying students with LD (or other disabilities) does not necessarily lead to improvements in reading, particularly in students nine years of age and above.

Traditional approaches to reading instruction in the early grades have substantially underestimated the variability among children in terms of their talent and preparation for reading. Data suggest that many of these youngsters have difficulties reading, not because of a disability but because they are initially behind and do not receive the home and/or classroom instruction/supports necessary for foundational language and early reading skills. Furthermore,

students having difficulty reading often exhibit challenging behavior as well.²⁰

Research has also shown that it can be difficult to distinguish between (1) internal child traits that require ongoing support from special education and (2) an inadequate opportunity or contextual support for learning and behavior. If children having difficulty reading receive effective instruction early and intensively, they can often make large gains in general academic achievement. Research has shown that reading failure rates as high as 38-40 percent can be reduced to 6 percent or less. By providing proper early intervention, special education resources can be deployed intensively to the six percent of struggling readers who do not respond to instruction successfully. Without early identification and effective intervention, children with learning disabilities, as well as others with reading difficulties, need long-term, intensive, and expensive special education services. Similarly, staff can successfully reduce behavioral disruptions through the use of PBIS.

In light of this research, Rhode Island school districts have been required since September 1, 2010, to use an RTI process to determine whether a student needs special education in the area of LD. Middle and high schools must use this process by September 1, 2011. At this point, school districts may no longer use the traditional significant ability/performance discrepancy criteria or approach to determine eligibility. This new requirement has significant implications for PPSD. The first of several criteria for LD essentially is that a student is scoring below proficient on statewide reading and/or math assessments. If the district does not have an effective, comprehensive, and well-implemented system of RTI, then it is difficult to determine whether a student's below-proficient reading performance is due to inadequate instruction or to a disability.

Providence RTI Framework

According to information provided by the district to the Council's team, a research-based, multi-tiered reading intervention model of RTI will be implemented in the fall of 2011:

PPSD is in the process of building a system that will provide student-centered, data-driven supports and interventions utilizing a problem-solving process...to determine appropriate levels of support and intervention will include identification of student-based issues, (specifying both target and actual performance), identification of supports and interventions developed to address those issues, measurements designed to evaluate responsiveness, and the identification of responsible LEA staff.

²⁰ Statement by Dr. Reid Lyon before the House Committee on Education and the Workforce Subcommittee on Education Reform (2002) at hhs.gov/asl/testify/t020606a.html; Technical Assistance Center on Positive Behavior Interventions and Support at <http://www.pbis.org/apbs2008.html>; National Center on Student Progress Monitoring at <http://www.studentprogress.org/>; Minority Students in Special and Gifted Education (2001) at http://books.nap.edu/openbook.php?record_id=10128&page=15

In spite of this projected implementation date, the team received a substantial amount of written and verbal information about RTI activities that have been implemented, including universal screening and progress monitoring, tiered intervention, PBIS, and teacher support teams. In addition, the district has participated in RIDE’s RTI Technical Assistance Project. The district’s current implementation of RTI is reviewed below.

At present, it appears the district is using universal screening and progress monitoring tools for reading:

- Wireless Generation’s MClass is used to provide early electronic-literacy assessment through the use of palm pilots that allow input and analysis of Dynamic Indicators of Basic Early Literacy Skills (DIBELS) benchmarking data for every child in grades K-3. The system is also used for students in grades four and five who are involved with RTI for benchmarking and progress monitoring. All administrators have been trained to analyze this data by school, child, and teacher.
- The Group Reading Assessment and Diagnostic Evaluation (GRADE) is used as a universal screener in reading and is administered three times during the year for all students in grades 4 through 12, except for students receiving special education and who are ELL and meet exemption criteria. GRADE results are considered along with other measures, including NECAP results, to identify students needing tier 2 or tier 3 supports. Assessments connected with various intervention programs are used “for placement” and progress monitoring.
- Intervention programs, such as Language! and Direct Instruction, are also used and include progress monitoring data and analysis.

It appears that the district has not yet identified a universal screener for math. Currently, NECAP math results are used along with program assessments for placement and progress- monitoring purposes. In the absence of a math screening tool(s), the special education office, in collaboration with the math department, began to pilot the tool, Monitoring Basic Skills Progress, at three elementary schools. The use of the tool as a universal screening device has been challenging, however, since schools chose to begin implementing it in one grade only.

Written information that provides a description of the district’s three increasingly intensive tiers in reading at the elementary and secondary levels shows the following elements (see exhibits 31 and 32):

Exhibit 31. Elementary Level Intervention Parameters

	Frequency	Duration	Instructional Intensity
Tier 1	1-3 times a week	15 to 20 minutes	Whole small-group instruction by classroom teacher.

Tier 2	3-5 times a week	20 minutes	Targeted lessons from core curriculum.
Tier 3 (<u>> year</u> below grade level)	Daily	30 minutes	Alternative small-group curriculum by instructional support personnel, mostly special educators. (Applies to about 30 percent of students).

Exhibit 32. Secondary Level Intervention Parameters

	Performance Criteria	Instructional Intensity
Tier 1	On or above grade level in reading or mathematics	Instruction in core grade level curriculum in a single period that includes appropriate in-class supports to attain, maintain, and improve grade level performance.
Tier 2	On or near grade level in reading or mathematics but struggling in identified areas	Standards-based, student centered and differentiated instruction that <i>temporarily supplements</i> the core; in addition to above, additional period of targeted intervention to reinforce achievement in core grade-level curriculum.
Tier 3	Two or more grade levels below in reading or mathematics	Instruction <i>temporarily replaces</i> core curriculum; intensive intervention for extended time (two periods or 90 minutes) to accelerate progress so students can access core grade-level curriculum.

Focus Group Concerns

- Focus group generally believed that the pieces of RTI are in place in PPSD, but most agreed that there was no comprehensive framework in place to support a systemwide approach to RTI for all students, including students with disabilities and ELLs. Other participants viewed RTI core curriculum, interventions, and progress monitoring as challenging to implement.
- At the elementary-school level, instruction in all three tiers occurs at the same time for each grade level in order to minimize disruptions and maintain instructional continuity, as well as to allow for inter-class grade-based homogeneous instructional groupings. Focus group participants expressed concern that tier 2 interventions at the elementary level were not being used effectively and that instructional differentiation in the core curriculum was limited. Furthermore, focus group members were concerned that some schools did not have sufficient staff to provide tier 3 interventions effectively and that there were no tier 3 math interventions.

- At both the elementary and high school levels, reading intervention programs were considered to be successful. Math interventions were also cited as successful at the secondary level. Some focus group members expressed concern, however, about the status of some intervention programs for the next school year. Moreover, it was also unclear whether data exist to show the extent to which students improve their performance as a result of these interventions.
- At some schools, administrators reportedly ask special educators, related-service providers, and teacher assistants (under teacher supervision) frequently to implement tier 2 interventions and progress monitoring.
- Teachers have difficulty documenting the provision of interventions and analyzing data for progress monitoring because of insufficient professional development.
- A valid and reliable screening tool for language acquisition has not been identified for ELL preschoolers.
- It is unclear how the personal learning plans (PLP) used in the district interface with RTI. PLPs are required for students underachieving in literacy and must be reviewed every four weeks to analyze student progress on the interventions. Also, there was a perceived lack of consistency in the development and implementation of plans.

Positive Behavior Intervention and Supports (PBIS)

By all accounts, student misbehavior is a major problem in the schools, especially at the high school level. In addition to taking significant attention away from instruction, it takes up much of the principal's and special education administrators' time. It was reported to the Council's team that special education directors are approached for clinical placements of students without disabilities, who must be removed for disciplinary reasons when there is insufficient room in the district to accommodate them.

The special education office has developed a three-tiered and research-based PBIS model as the behavioral component of RTI in order to proactively meet the needs of students with challenging behaviors and to help determine if a student has an emotional disturbance and needs special education services. Staff reported that 19 of 21 elementary schools and all middle schools have been trained to implement tier 1 schoolwide PBIS. However, staff also reported that not all of the middle and none of the high schools have the PBIS process in place. The district does employ behavior coaches, but they are assigned to behavior-intervention classes designed only for students receiving special education services.

To support PBIS in the district, a leadership team (four psychologists and three social workers) collaborates with the Sherlock Center at Rhode Island College to:

- Provide training for implementation of tiers 1 and 2.

- Implement “trainer-of-trainers” professional development to increase districtwide PBIS capacity.
- Give guidance and ongoing support to school-based targeted behavior teams, which include the school psychologist, social worker, nurse, teacher(s), and/or guidance counselor.
- Provide ongoing technical support and data collection/analysis to all district schools using PBIS. This includes providing support for data collection and reporting of office referrals and consequences for disciplinary infractions on the electronic School-Wide Information System (SWIS).
- Conduct School Evaluation Surveys, which are research-based assessments of PBIS implementation at the school level.
- Link all PBIS schools through twice-annual meetings to exchange ideas and assess school needs.
- “Serve as the advocacy and communication link for all PBIS schools in the district and with level administrators.”

In addition, the leadership team actively engages with the community to communicate the benefits and function of PBIS by co-presenting with the Providence Teachers Union and presenting to the Local Parent Advisory Committee for Special Education (LAC), the Parents Alliance, and to the Providence After School Alliance (PASA). In addition, psychologists and social workers are developing a PBIS procedural guide and handbook.

Focus Group Concerns

- Focus group participants expressed concern that schools were not implementing PBIS with sufficient fidelity, something the Council’s teams often hear when conducting these reviews. Although the district has voluminous written information about supporting positive student behavior and forms (including an excellent classroom management checklist), the information is not compiled in a single document or on the district’s website for easy reference.
- A major concern of the focus groups involved the lack of an explicit district policy for PBIS or established expectations for its implementation. This void is leaving too many teachers without the tools they need for effective classroom management that would lead to positive student behavior. Some participants also indicated that they believed that some teachers resist or fail to implement suggestions from psychologists and social workers.
- There was also a general perception that classroom management was not a priority for the district and that professional development was more available for related-services personnel than for teachers or teacher assistants. Focus group participants also indicated

that resistance to PBIS was also evident among some specialists (e.g., art, music, physical education, health) and part-time staff. Also, there was resistance by some staff members who prefer to concentrate on negative consequences rather than taking a more proactive, positive approach through PBIS.

- According to focus group participants, one consequence of the lack of systemwide expectations for PBIS implementation is the lack of a consistent electronic progress-monitoring tool for behavior. SWIS use is scattered, and there has been active resistance to it in some schools (mostly middle) where secretaries filed a grievance to challenge the requirement for them to input of SWIS data. As a result, some schools no longer collect this information electronically and have gone back to a paper/pencil recording systems that makes it difficult to aggregate and analyze data on a school, grade, or district level. In addition, because of the way the SWIS vendor manages the product, the central office does not have automatic access to the data. Only the schools—not the district—have access to the data unless the school grants permission to the district to access it.
- Although the district has used a nationally recognized consultant to provide training for staff to address the needs of students with disabilities who have significant behavioral challenges, the district lacks a common language for the development and use of behavior intervention plans (BIPs) and for a behavior education program, which is a student intervention program based on a “check-in/check-out” model. As a result, there is confusion between the two activities, i.e., the interventions and the behavior programs, which have different purposes. Training has been provided on the development of effective functional behavior assessments (FBA) and BIPs, but not all teachers reported familiarity with their use.
- Although there has been a fair amount of professional development provided to school staff, concern remains that it has not been sufficient due to funding restraints or that, because it is not mandatory, all necessary school staff do not attend. In addition, there is concern that the district lacks a systemic approach to providing teachers additional support when necessary.
- Although more elementary and middle schools have tier 1 (schoolwide) and tier 2 interventions for groups or individual students needing targeted assistance, fewer schools have tier 3 community-based “wrap around” services for students with intensive needs.

Teacher Support Teams

To support RTI practices, the district uses a teacher support team (TST) model where teachers can receive collaborative support to develop effective strategies for students experiencing learning and behavioral difficulties in the classroom. According to written information, principals should head the TST when it includes various school-based educators. The TST process includes

- a. A thorough review of the student's learning problems.
 - A written intervention plan, which includes (1) recommendations for specific in-school accommodations/modifications, such as curriculum modification; (2) teaching strategies for use of support and consultative services; and (3) personnel responsible for implementation.
 - Monitoring progress of performance and adjustments to instruction based on the results of that monitoring.
 - Parental involvement and how parents can support their child.
- b. The following concerns were raised about the TST process and its implementation:
 - The special education office has taken a leading role in the TST process. Because the TST is mainly staffed by special education teachers and related service personnel, and because the special education office provides training for TST participants and develops information and forms, there is a close relationship with RTI, the TST process, and special education. Teachers view RTI and TST as an avenue to special education services.
 - TSTs at schools with more supportive leadership have more productive teams than schools who do not. As with PBIS, there are no systemwide expectations for this process.
 - For the most part, TST is a before/after school activity, which is a problem when staff members are unable to participate at these times.

Data Analysis of Students with Disabilities in Various Educational Settings

As is required by federal law, RIDE has established targets in its SPP for the percentage of students with disabilities ages 6-21 years who receive special education services in three specified types of educational settings: general education more than 79 percent of the time; general education less than 40 percent of the time; and in separate schools. The exhibits below show PPSD's outcomes in these areas.

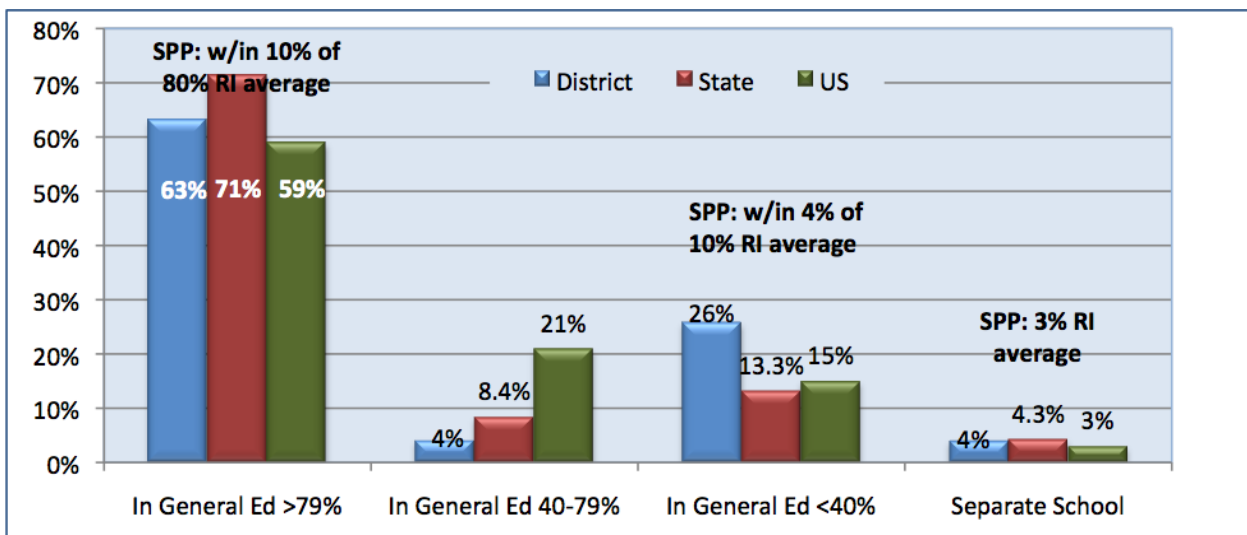
Students with Disabilities in General Educational Settings and Separate Schools

The exhibits below provide data on participant rates in various PPSD educational settings, compared with the state and the nation:

- ***General Education for More than 79 Percent of the Time:*** PPSD's rate of 63.2 percent is higher than the nation's 59.4 percent but less than the state's 72.4 percent. The district's rate does not meet the state's standard for this setting.
- ***General Education Between 79 and 40 Percent of the Time:*** The district's 4.1 percent rate and the state's 8.0 percent rate reflect a much lower use of this educational setting than the nation's 20.7 percent. The SPP does not have a performance target in this area.

- **General Education for Less than 40 Percent of the Time:** PPSD’s rate of 25.8 percent is higher than both the state’s rate of 12.8 and nation’s rate of 14.6 percent. The district’s rate does not meet the state’s standard for this setting.
- **Separate Schools:** PPSD’s rate of 4.8 percent of students in this setting is lower than the state’s average of 5.1 percent but higher than the nation’s 3.4 percent. Still, the district did not meet the state’s target of 3.0 percent.

Exhibit 33. Educational Settings 6-21 Years of Age²¹



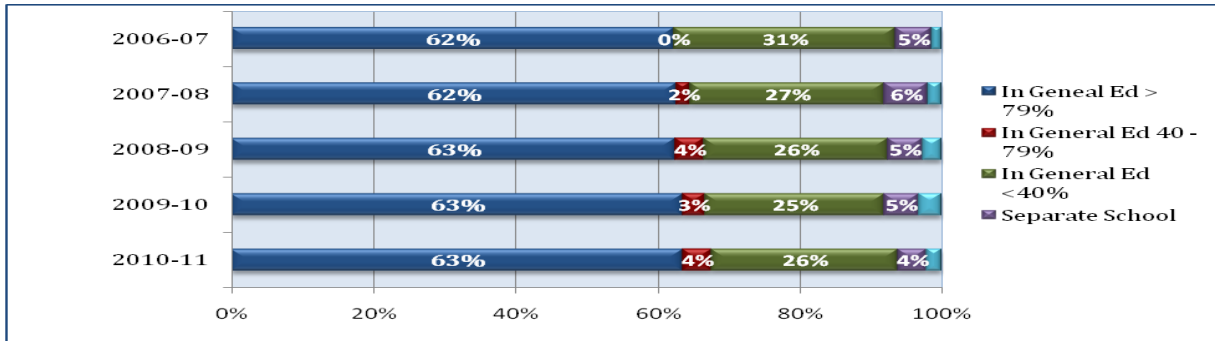
Comparison of Educational Setting Placement over Time

The percentage of students receiving special education services in general education settings more than 79 percent of the time was slightly higher in 2010 (63.2 percent) than in 2007 (62.3 percent). Similarly, students educated in general education less than 40 percent of the time decreased little more than one percentage point (27.0 to 25.8 percent).

However, the percentage of students educated in general education between 40 percent and 79 percent of the time nearly doubled from 2.4 percent to 4.1 percent over the period. Finally, the percentage of students in separate schools decreased from 5.0 percent to 4.1 percent. (See exhibit 34.)

²¹ PPSD and state data are based on RIDE 2010-11 school year and were provided by PPSD; National data are based on the 2009-10 school year and are provided by Data Accountability Center at https://www.ideadata.org/arc_toc11.asp#partBLRE.

Exhibit 34. Percentage of Students in Various Educational Settings (2006-10)

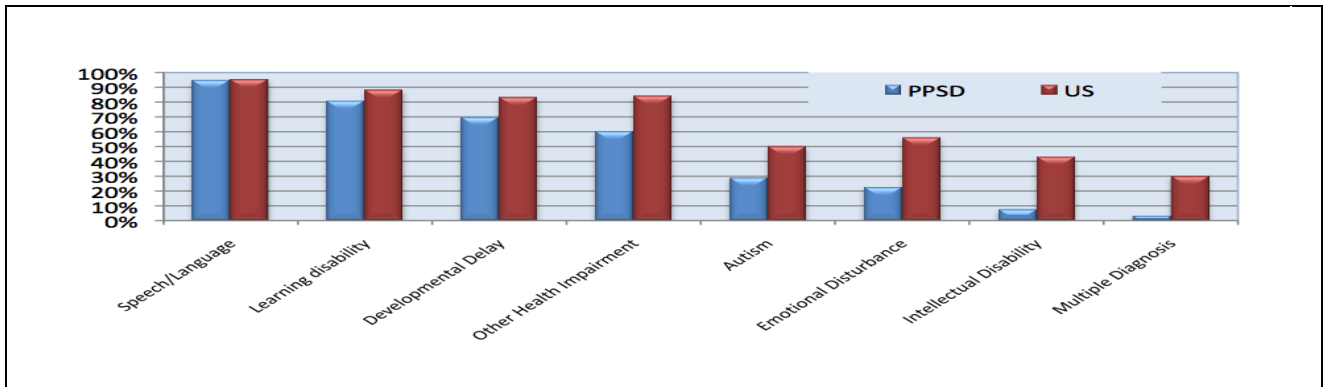


PPSD Placement Rates by Disability Areas

PPSD data provided to the Council’s team did not show the federally mandated educational settings by disability area. Instead, the district restricts its analysis to students in general education or in self-contained classes. In the exhibit below, district data from 2009-10 are compared to the latest available national data from 2005-06.²² (See exhibit 34.)

Other than the area of speech/language, a smaller percentage of PPSD students are in general education settings than in the US. The disparity is especially significant in the areas of autism, ED, intellectual disabilities, and students with multiple diagnoses. (See exhibit 35.)

Exhibit 35. Percentage of Students by Disability in General Education, PPSD, 2009-10, U.S., 2005-06

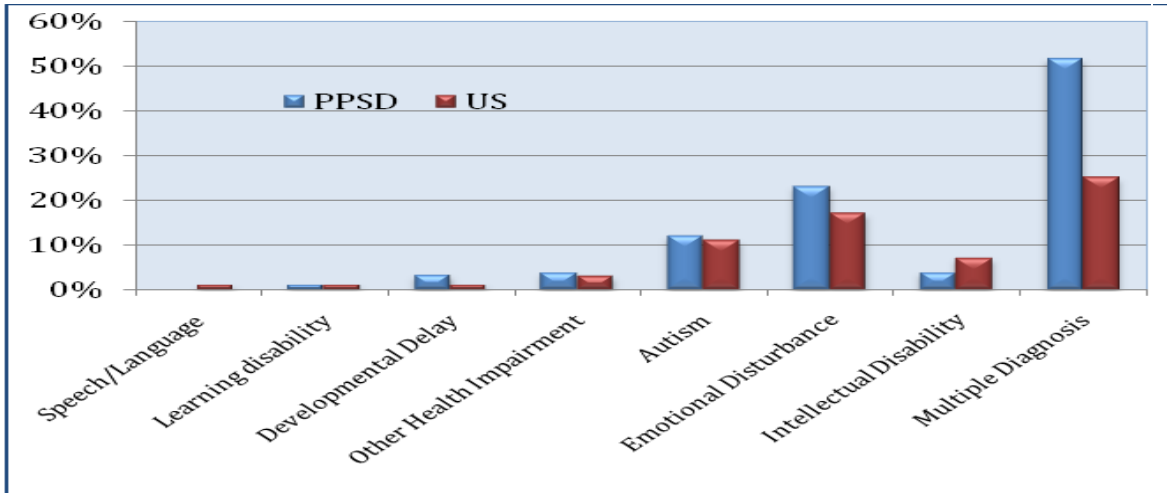


In addition, other than in the areas of speech/language and multiple diagnoses, a larger percentage of PPSD students in every disability area are educated in separate classes for most

²² Source is latest available U.S. Department of Education 29th Annual Report to Congress. Note: Historically, the percentage of students in less restrictive environments increases by year. Data were combined for students in general education more than 79 percent of the time and between 40 and 79 percent of the time.

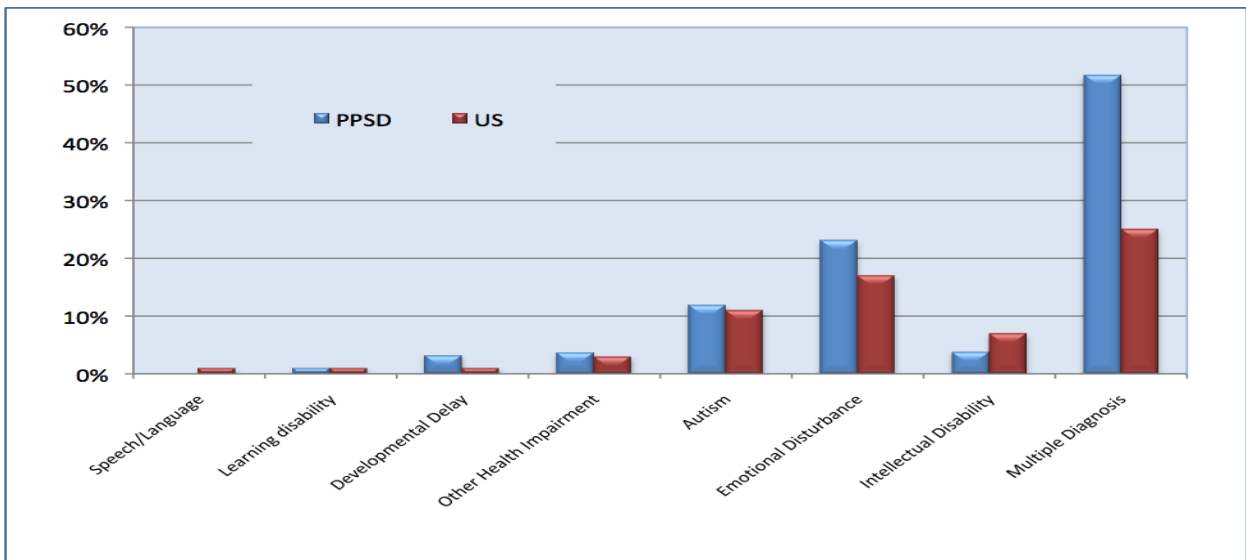
of the school day. The disparity is especially apparent in the areas of other health impairment, ED, and intellectual disability. (See exhibit 36.)

Exhibit 36. Percentage of Students by Disability in Self-Contained Classes, PPSD 2009-10, U.S. 2005-06



Compared to the nation at large, PPSD educates a larger percentage of students with ED and multiple diagnoses in separate schools (day and residential). However, the placement rates are not so different from the nation in other disability areas. Note that it is not clear from the data whether the rates include students from the Birch Vocational Center, which is also a separate school. (See exhibit 37.)

Exhibit 37. Percentage of Students by Disability in Special Schools

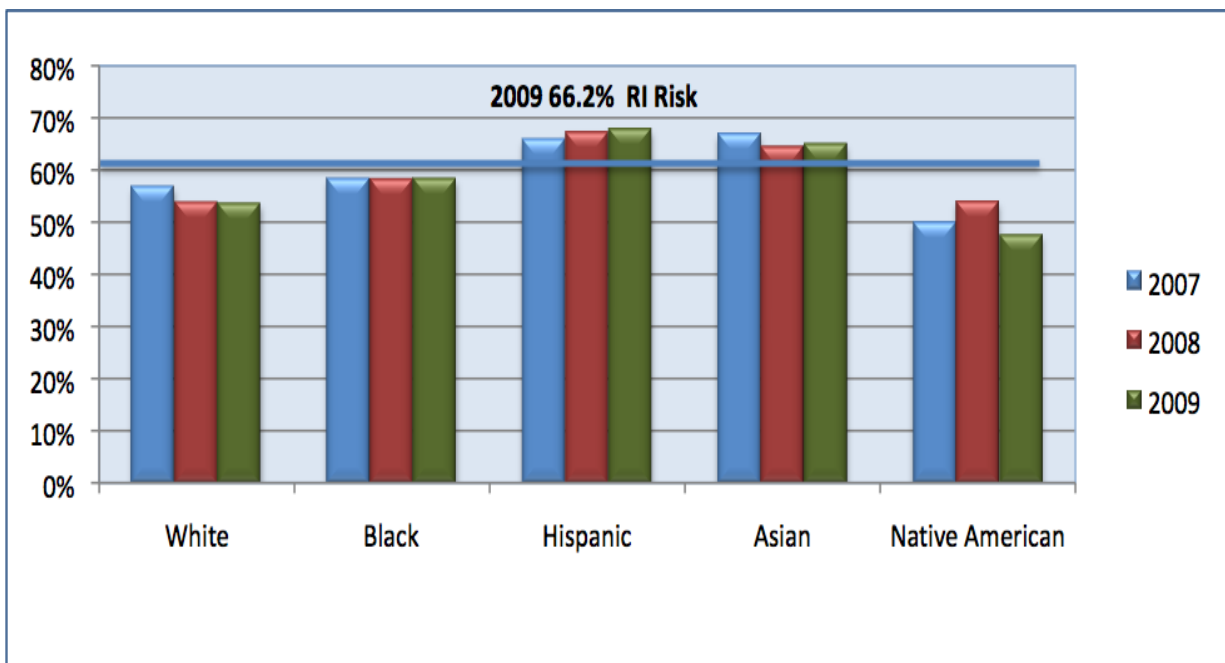


Students with Disabilities by Race/Ethnicity in Various Educational Settings

IDEA requires states to monitor the extent to which school districts have significantly disproportionate rates of students in various educational settings by race/ethnicity. RIDE uses risk analyses rates to determine the extent to which district students in each racial/ethnic subgroup are placed in each educational setting. The exhibits below show RIDE data for PPSD, compared with the state.

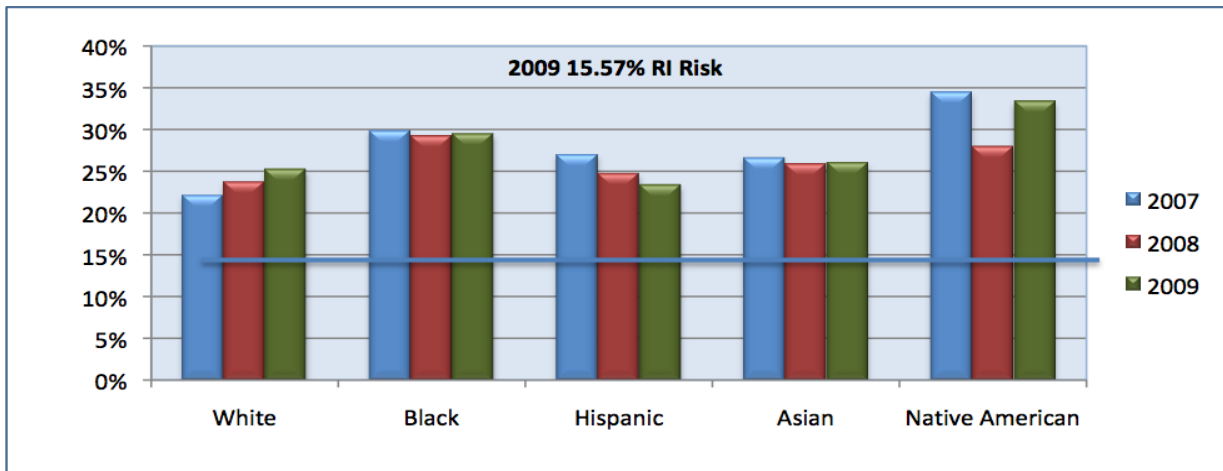
For students receiving special education services who spend *at least 80 percent of the time in the general education setting*, PPSD data are not very different from the state’s 66.2 percent figure, although the likelihood for PPSD’s Hispanic students is slightly higher than for Hispanic students statewide. (See exhibit 38.)

Exhibit 38. Percentage of Special Education Students Who Spend at Least 80 Percent of Their Time in the General Education Setting, by Race/Ethnicity, in PPSD and in State, 2009



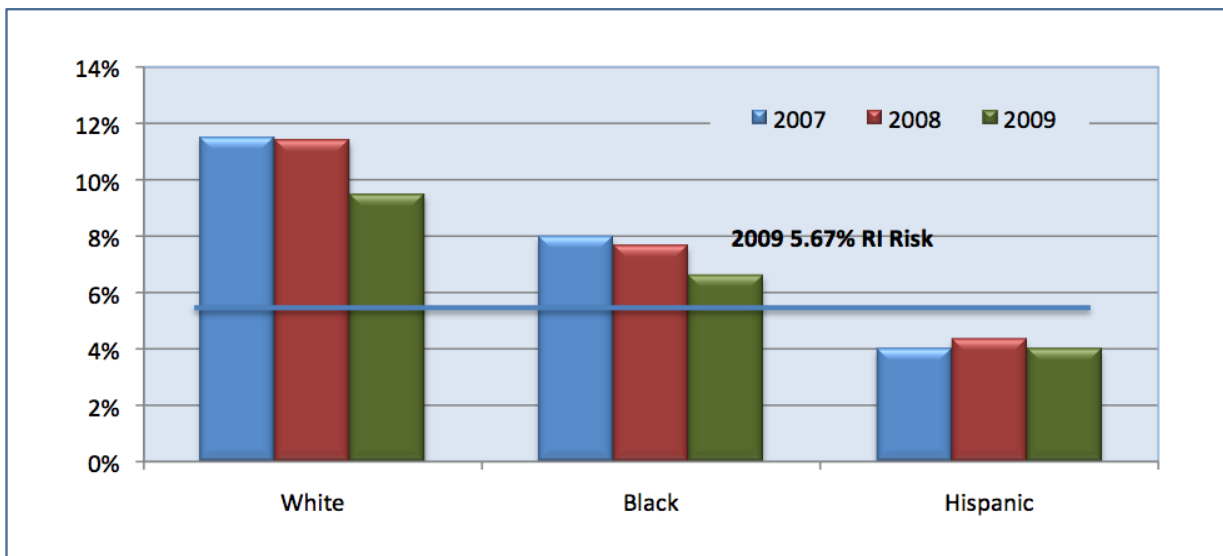
PPSD students in all racial/ethnic groups who receive special education services are more likely to spend *less than 40 percent of the time in the general education setting* than their statewide peers. In 2009, the likelihood decreased for PPSD’s Hispanic students, increased slightly for White students, and increased to a greater extent for Native Americans. The likelihood for Black and Asian students remained the same. (See exhibit 39.)

Exhibit 39. Percentage of Special Education Students Who Spend Less than 40 Percent of Their Time in the General Education Setting, by Race/Ethnicity, in PPSD and Statewide, 2009



The likelihood that White and Black students receiving special education services are being educated in a *separate school* has decreased over time. The likelihood continues to be greatest for White students, however, and Black students have a slightly higher likelihood than other White and Black students in the state. (See exhibit 40.)

Exhibit 40. Percentage of Special Education Students Who Are Educated in Separate Schools by Race/Ethnicity, in PPSD and Statewide, 2009²³



²³ The number of Asian and Native American students in special schools was too small for the risk analysis.

Supporting Instruction in Inclusive Settings

As reported above, only 12 percent of students with disabilities overall scored proficient and above in math and reading in the 2009-2010 school year, a rate that showed no progress over the previous year. Some 52.8 percent of students with disabilities graduated in 2010, 18.5 percentage points below their nondisabled peers, and the gap in graduation rates between students with and without disabilities increased 8.9 points between 2007 and 2010.

To determine how PPSD might better support students with disabilities on these performance outcomes, the Council's team looked at the manner of instruction, interventions, and supports provided to these students in general education classes where the majority (67 percent) of the students receiving special education services spent at least 40 percent of their time during the school day. Written PPSD materials and focus group participants provided information pertinent to this topic, which is summarized below.

Differentiating Instruction

For students with disabilities to be successful, it is essential that their instruction be differentiated so that each student is able to access and master the core curriculum.²⁴ Focus group members reported varying degrees to which teachers implement differentiated instruction adequately.

- At all grade levels, general education teachers reported having a difficult time instructing students with different needs. This was especially true at schools having an overall reading proficiency rate below 35 percent and classes where as many as 40 percent of the students have an individualized education program (IEP).
- Focus group participants reported that differentiation has been more successful at elementary schools (although it is still a developing skill) than at the high school level, where it is perceived that “teachers teach subjects and not students.” Implementation has also been difficult for some teachers at all levels, who do not believe that some students may need a different approach to instruction.
- At the middle school level, principals indicated that there had been professional development in differentiation, including how to organize classrooms utilizing a math-workshop model. In addition, principals’ “walk-through” tools address the application of differentiated instruction training, but overall, most believed that practice was at a 5 on a 10-point scale.

²⁴ Note that differentiated instruction is also needed for students without disabilities, ELL students, and students receiving special education in separate self-contained classes.

General Education Instructional Support

PPSD has several different approaches to supporting students with disabilities who receive instruction in general education classes for the majority of the school day. These include the use of intensive resource support; support by special educators, therapists, and/or trained paraprofessional; and co-teaching.

Support through Special Educator, Therapist, and/or Paraprofessional

Special educators, therapists, and/or trained paraprofessionals provide direct instruction, instructional support, and other special education instruction and support to students or groups of students. Speech/language pathologists, for example, focus on providing extra services in general education classes. Some concerns were expressed, however, that students requiring “intensive resource” support were not always receiving all that the IEPs required.

Co-Teaching

The Council’s team received more feedback about the PPSD co-teaching model than any other model used by special educators and others to support students with disabilities in general education classes. Under the co-teaching strategy, general and special educators teach together in the general education class using a variety of models.

At the middle and high school levels, PPSD reported having difficulty hiring special educators with dual certifications in a content area (particularly math and sciences) to teach core curricular material in a self-contained setting. To address this situation, a pilot program was established in which students formerly instructed in separate classes now receive instruction in the general education class with co-teaching support. This model is in place in at three of the district’s six middle schools and two of its high schools, and the students attend general education math, science, social studies, and English, as well as intervention programs.

All teachers in the pilot program received professional development on co-teaching strategies, including a review of special education regulations, co-teaching models, and effective implementation and planning. The training was school-based and involved co-teachers working together to plan and develop a co-teaching environment in the 2010-11 school year. In addition, special education directors and supervisors provided and will continue to provide in 2011-12 professional development to other special and general educators on co-teaching models and strategies, and differentiating instruction.

At the high school level, students’ “teacher of record” continues to be the special educator even though the general educator delivers the content material. The special educator modifies the content to the level of instruction for students in the “self-contained classroom.” At high schools not participating in the pilot, students continue to receive instruction in their self-contained classes with 12 to 15 students from special educators not certified in a content area but who otherwise meet the state’s high qualification standard.

The district is expanding its co-teaching approach for the upcoming school year at all levels. Trained special education specialists will serve as coaches to teams of co-teachers to provide technical assistance and embedded professional development in order to improve the extent to which students with disabilities can access the core curriculum. The following bullets summarize focus group feedback on the district's co-teaching efforts.

- It was apparent that more special educators are providing instruction in general education classes than in the past and there is a desire by most personnel to see more co-teaching and supports for co-teaching in place. Also, there is a strong perception among focus group participants that co-teaching has improved, especially at the elementary level, and while it is not consistently implemented at a high level across all schools and classes, some good models are in place. The process is at various stages of development and looks different in different schools and even within schools. One impressive example, however, involved fourth grade ELL students where 16 of 24 were able to exit bilingual classes and were succeeding on grade-level material.
- There were concerns about the impact of co-teaching when the two teachers do not “get along.” For example, some focus group members indicated that some principals have paid insufficient attention to the pairing process and teacher preferences. At times, there is tension because of a perception that the general educator is not sufficiently “sharing” the class. Tension may also arise when special educators lack expertise in a core curricular area and are not qualified to provide any primary instruction or effective support. The process appears to work best when special educators are highly qualified in content areas. For example, it was reported that in a high school chemistry class an exemplary co-teaching team supported all students, including the large percentage of those with IEPs. In this case the special educator had significant expertise in chemistry. Teachers expressed a desire to visit such model classes to see high quality instruction in practice. It was suggested that recruiting special educators trained in needed content areas—or training special educators in those areas—would greatly benefit instruction.
- Although PPSD provides what appears to be a fair amount of professional development to support inclusionary practices, there is a universal belief among staff members the team interviewed that more is needed. Suggested areas of professional development include differentiation instruction and hands-on application of various co-teaching models.
- Focus groups noted these additional challenges to providing effective co-teaching:
 - A lack of effective models for special educators to support students in general education classes when co-teaching is not occurring full time. In some cases, a paraprofessional will support students when the special educator is not available, but there is little time for sharing information. There is also a concern that all “IEP minutes” are not always provided.
 - Classes with more than 30 percent students with IEPs.
 - Inclusion of students with very different instructional needs.

- IEP goals that are not aligned with class content.
- Challenging behavior of students, including those without disabilities.
- The need for materials and supplies, although one principal indicated how such purchases were prioritized and accomplished.
- Finally, although there is weekly common planning time for special and general educators to focus on standards and sharing instructional practices (including student modifications and accommodations), many interviewees said that such time is not consistently available.

Supporting Instruction in Self-Contained Settings

PPSD provides students with special education services in 21 separate self-contained classes that typically have two to three different grade levels in each class. Programs are designed for students with autism, severe intellectual disabilities with a possible combination of medical needs, and seriously challenging behavior.

In General

According to district information, the distribution of self-contained classes across schools has changed over time. In the past, there were one to two such classrooms in a school building, each having three to four grade levels. In the past three years, however, elementary-level self-contained classes are at fewer schools, so each school has at least three classes with two grades in each. For example, Webster Avenue School has three classes at grades K-1, 2-3 and 4-5. As a result, students do not have to move between elementary schools as they advance to the next grade. Below is a summary of substantive issues raised by focus group participants:

- It is difficult for teachers to provide their students access to the core curriculum when covering two grade levels.
- Although schools consider enabling students to attend general education classes during the day, the opportunity is limited by “full general education classrooms,” “scheduling conflicts,” or a financial inability to add staff for additional support
- Some focus group participants were concerned that it was difficult to educate more students in general education classes because general educators are not trained sufficiently in addressing behavioral and instructional needs of students who previously had been educated in self-contained classes.
- Students at high schools that are not in the district’s pilot program continue to receive instruction in self-contained classes with 12 to 15 students from special educators who not certified in a content area but meet the state’s high qualification standards.

- “Special education classes” are often referred to as “fundamental” at the high school level, reflecting content that is different from the grade-level standards upon which students with disabilities who take the NECAP are assessed.

Intensive Interventions for Students with Autism Spectrum Disorder (Autism)

According to some focus group participants, the autism program is well respected. Hope High School has a self-contained program for students with autism that RIDE designated as a model. However, 71 percent of PPSD students with autism are educated outside of general education classes for at least 60 percent of the school day either in a district or private school setting,²⁵ compared with 50 percent nationwide.

An autism specialist/board certified behavior analyst supervises the autism team, which includes a behavior analyst (certified in applied behavioral analysis), a social worker, a speech pathologist, an occupational therapist, a job coach, social coaches, and teacher assistants. The autism team provides support to students and their teachers in the district’s 10 self-contained classes and consults with school teams educating students in general education classes in district and local private school settings (for parentally placed students). Also, the autism team provides in- and out-of-class professional development to special educators and teacher assistants.

Written information prepared by the district describes various research-based instructional approaches used to support these students. But, commenting about services provided to students with autism, focus group members noted the need for more equipment and supplies, such as weighted vests, and for a larger teacher-substitute pool for absent teacher assistants.

Intensive Behavioral Interventions

As discussed above, issues involving disruptive behavior of students with and without disabilities take up a significant amount of teacher and administrative time. The district’s Behavior Intervention Program is designed to enhance the academic and social/emotional skills of students with behavior problems that could not be addressed in general education classes. The program has the following features:

- Use of a structured and specific behavioral-point system in all classes.
- Personnel that include special educators, teacher assistants, social workers, and behavior coaches highly trained in crisis prevention and intervention and behavior management strategies.

²⁵ Twelve percent of PPSD’s students with autism are placed out of district in a private school to receive an appropriate education.

- Behavior coaches who perform multiple tasks daily, including observing students and recommending interventions, addressing crisis situations, leading social groups and engaging parents, liaising with outside agencies, leading monthly data-review sessions with teachers, and providing professional development for schools and the district. The behavioral coaches credit the additional 10 days they work for enabling them to accomplish all their tasks. They also credit a supportive supervisor, even though the supervisor is also responsible for schools without the program and is not assigned to all schools with the program.
- Professional development for teachers and staff on the analysis of behavioral data and support for students with challenging behaviors.

Focus group and special education administrators had a number of major concerns about the program, however, which involved the lack of a sufficient number of qualified teachers and teacher assistants and the manner in which they are assigned. For example:

- Teacher assistants are placed by seniority and the bidding process, and substitutes are not available to cover their frequent absences. These issues, which also apply to the autism program, are discussed further in section D.
- Most teachers hired by principals are new to the field.
- Some positions are filled through “forced placements,” where PPSD teachers who do not have jobs are able to select from open positions.

Last school year, the district used American Recovery and Reinvestment Act (ARRA) funds to support 36 students who had been in out-of-district placements, permitting them to attend PPSD Behavior Intervention Programs at middle school (1 class) and high school (2 classes). The district also added a vocational component and wraparound services with a mental health agency. Although this action reduced the cost of private school tuition, the initiative was not considered fully successful because the monthly training sessions for teachers in crisis intervention and behavior did not compensate for their lack of experience, knowledge, and skills with these students. In addition, a reduction in the number of behavior coaches and social workers—as well as loss of staff to paternity and maternity leave—weakens staff capability.

Next year, students in the unsuccessful classes will be returning to out-of-district placements. This plan, however, will reduce the capacity of the Behavior Intervention Program and provide fewer in-district options for students with disabilities who have the greatest need for the most intensive behavioral interventions, including some students transferring from the Rhode Island Training School. The Council’s team was told that the district was unable to contract with private schools to provide experienced support services in district schools—a successful model used by other districts—because of union contract issues.

Instruction for English Language Learners with Disabilities

The district uses a variety of models to support students who are ELL and also have IEPs. These models are different for students in grades K-6 and at the middle and high school levels. ELL students in K-6 receive language support in bilingual or English as a second language (ESL) classes. An ELL student may receive special education instruction in the following ways:

- Bilingual co-taught class
- Bilingual special education self-contained class, or
- ESL class with special education resource support.

ESL teachers do not support students with disabilities who are ELL in either general education or self-contained classes. ESL self-contained classes (at the elementary level) are not able to provide support that requires self-contained special education or special education inclusion (two to three hours a day). In these cases, an ELL with disabilities, who is placed in an ESL class would need to waive his or her ESL language-support services in order to be placed in a general education or self-contained special education class. However, bilingual education self-contained classes (at the elementary level) are able to provide support for ELLs with disabilities through special education resource or bilingual/special education self-contained classes. ESL self-contained classes can accommodate special education resource support for ELLs with disabilities, which includes one hour of instruction three times a week. At the middle and high school levels, ELLs with disabilities may receive ESL and special education support in a more flexible manner.

ELL students, including those with disabilities, are provided with the reading intervention *Language!*. Teachers report that students make good performance gains with this intervention program. Focus group participants reported, however, that they had the following additional concerns about instruction for ELLs with disabilities:

- The large percentage of students with disabilities in ESL or bilingual classes. The Council team was told that some ESL teachers will not support ELL students outside of an ESL class.
- Although ELLs with disabilities may be identified for a gifted or talented program through the use of a nonverbal assessment, teachers provide few if any accommodations.
- The district does not have a sufficient number of teachers who are ESL-certified and able to effectively use strategies to support or scaffold student language development. However, a number of organizations and the Rhode Island College offer ELL certification, which involves three classes.

Placement of Students in Out-of-District Private Schools

PPSD reported that the percentage of students with disabilities placed in private out-of-district schools fell from a high of 6.04 percent in 2009-10 to 4.01 percent in 2010-11. Of the 235 students²⁶ PPSD placed in private schools, 52.3 percent (123 students) were identified as having ED and 13.6 percent (32) had multiple diagnoses.

The remaining 34.0 percent of students (80 students) were identified as having a small number of other primary disabilities. Because of the difficulties with the district's expansion of the Behavior Intervention Program as discussed earlier (pp. 61-62), the district anticipates that students who were in unsuccessful classes will be placed back in private school settings. Also, it was reported to the Council's team that the Student Affairs Office frequently calls for private placements for students who have violated the code of conduct or need a 45-day diagnostic placement.

Unlike some other states, Rhode Island does not set rates for private out-of-district special education facilities. However, by reducing the number of private schools used by the district, one of PPSD's special education directors was able to negotiate a reduced rate with four private schools. Moreover, an additional expense for next school year involves a newly applied tuition the state will be charging for students attending the School for the Deaf.

Support for Postsecondary Transition Activities and Services

Transition services are intended to better prepare students with disabilities to gain access to the supports and services necessary for them to reach desired outcomes and become as independent as possible. The transition planning process is expected to promote postsecondary school experiences based on student preferences, interests, and abilities.

SPP Indicators

Because of the importance of transition activities and services, states are required by federal law to monitor two areas as part of the SPP. The indicators and the district's level of performance are described below.

- **Indicator 13–Transition Planning.** With a rate of 97 percent, PPSD almost met the rigorous federal mandate of 100 percent compliance for youth 16 years and above with an IEP that:
 - Includes appropriate, measurable postsecondary goals.

²⁶ Note that, at the time of the Council's team visit, PPSD had 266 students in out-of-district placements. The number fluctuates depending on the needs of newly enrolled students and changing student needs in PPSD schools.

- Is annually updated and based on an age-appropriate transition assessment, transition services, and courses of study that reasonably enable students to meet postsecondary goals.
- Includes annual IEP goals on the student’s transition services needs.
- Has documentation showing the student was invited to the IEP team meeting where transition was discussed.
- Has documentation showing that, if appropriate, a representative of a participating agency was invited to the meeting (with prior consent of the parent or student who is 18 years of age or older).²⁷

The Council’s team was also informed that the district’s compliance rate in this area was 90.4 percent, which is lower than the reported 97 percent rate. We were unable to reconcile the discrepancy.

- **Indicator 14 - Transition Outcomes.** According to RIDE’s 2009-10 public reporting, 66.2 percent of youth with IEPs no longer in secondary school and within one year of leaving high school were enrolled in higher education or some other type of postsecondary education or training program or were employed. The SPP’s overall target was 75.9 percent. Although data are not yet available, the state’s targets for 2010-11 were:
 - 33 percent enrolled in higher education
 - 67 percent enrolled in higher education or competitively employed
 - 78 percent enrolled in higher education or in some other postsecondary education or training program, or competitively employed or in some other employment within one year of leaving high school.²⁸

Overview

Generally, PPSD has a strong system of transition services and activities, evidence of which is seen in the following highlights:

- Through a strong partnership with RIDE and the state’s Office of Rehabilitation Services (ORS), the agencies fund a consultant who serves as the district’s transition director. The director is extremely knowledgeable about transition support and provides guidance, technical assistance, and professional development for special and general educators.
- A high school elective transition course is offered to all juniors and seniors to work on transition services and includes a senior research seminar.

²⁷ RIDE data reflects the public reporting period of July 1, 2009 to June 30, 2010, which was reported in the Annual Progress Report/SPP to OSEP on February 1, 2011.

²⁸ These outcome targets increase by one percentage point each year.

- An ORS-funded rehabilitation councilor is in every high school, which is not a common occurrence nationwide.
- There appears to be strong collaboration between the Rhode Island Parent Information Network and PPSD, which includes parent training on transition services.
- State-funded transition personnel provide positive feedback on the district's collaboration and support for transition services.

Programmatic Components

This subsection summarizes student access to transition assessments, community-based work opportunities for secondary school youth with disabilities, support for students provided at the Birch Vocational Center, and the district's Transition Academy that is housed at a private university.

Community-based Work Opportunities

The district does not appear to have a comprehensive transition framework that articulates expectations for schools to support community-based training and work opportunities for students with disabilities. Instead, every building appears to act independently, and some are able to provide better experiences than others. The district and ORS fund Project WORK, which annually helps 30 ORS-eligible high school students with disabilities to consider career choices and postsecondary education options. Multiple vendors and companies are available to provide internships for students during the school day. However, the program has the following limitations:

- Students must be transported by bus, which is difficult to arrange
- It was reported to the Council's team that some students and families fear that payment for work will negatively impact the receipt of Supplemental Security Income (SSI) or Social Security Disability Income (SSDI) and they do not fully comprehend the benefits of the work experience.

Birch Vocational Center

Started about 40 years ago by parents, the Birch Vocational Center provides about 80 students from 14 to 21 years of age with academic, vocational, and social support. Student enrollment appears to have increased over the last two years. The following summarizes relevant information about the school:

- Students who have intellectual disabilities access the core curriculum "at a very low level." Reportedly, about half of these students take the regular statewide assessment and others take an alternate assessment. None of the students graduate with a regular diploma.
- Except for one student with a bus pass, all students are transported to school.

- In addition to special educators and teacher assistants, the school has a full time speech/language pathologist, an 80 percent occupational therapist, 40 percent physical therapist, full-time nurse, and a social worker one day per week.
- When students turn 18 years of age, the school contacts the Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH) to help the students apply for agency services and plan post-school support.
- Birch operates a federally licensed sheltered workshop and contracts with different companies for work, such as sorting, bagging, and carting. Students 16 to 21 years of age are paid for this work. In the past, the school had work programs at community-based work sites at hospitals and medical centers, but such partnerships ended when mandatory immunization requirements were instituted. The principal stated that students had “suffered enough.”
- Students take monthly trips into the community for opportunities to interact with others and develop social/emotional skills.

The transition director arranged for a knowledgeable transition consultant to provide research-based recommendations for the school’s and principal’s consideration. The Council team was told that the school did not take follow-up action. The principal is extremely proud of his program, reports extensive parental support, and based on the above, appears reluctant to make changes.

Transition Academy

The district’s Transition Academy, housed at Johnson and Whales University, is for fifth-year high school students able to be independent in the community. The program, which provides in-depth vocational opportunities, is for students who have technically "graduated" but require one more year of transition services. The program is partly funded by ORS. Of 14 students, eight had found employment at the time of the Council’s team visit.²⁹

Transition Planning and Electronic Transition System

Secondary-level special education personnel receive training on transition assessment in order to support planning of transition services. Also, the special education office purchased a comprehensive electronic system that supports transition planning, including student assessments, rubrics, support for writing IEP annual goals, and collecting/reporting data.³⁰ However, the Council’s team was told that there are unresolved issues preventing its use at all high schools.

²⁹ According to the district’s secondary special education director, by the end of the school year, all students had employment opportunities or were planning to attend a postsecondary education program.

³⁰ <http://www.tensigma.org/products/index.html>

Summary of Positive Observations, Concerns, and Recommendations on Instructional Practices and Support

The following summarizes positive observations, areas of concern, and recommendations to improve instructional practices and support.

Response to Intervention

Positive Observations

- ***RTI Implementation.*** Although the district does not have a comprehensive framework for RTI, various pieces of the process are in place for reading. School-based personnel have a firm awareness of the process and indicate that they are in various stages of implementation. Universal screening tools are available for reading at the elementary and secondary levels, and the special education office, in collaboration with the math department, is piloting a tool for screening and for monitoring progress in math at three elementary schools. In addition, there appear to be several research-based interventions for reading that school personnel indicated they are using for students needing various levels of support. Furthermore, speech/language pathologists plan to develop an RTI approach for children having difficulty in this area.
- ***PBIS Implementation.*** A large percentage of elementary and middle schools reported they are implementing PBIS with some success. The district's leadership team, in collaboration with the Sherlock Center, has provided support to schools on PBIS guidance and training and monitors the fidelity of program implementation. The leadership team has provided joint training with the union and provides information about PBIS to parent organizations. In addition, the leadership team is developing a written PBIS guide for the district.
- ***TST Problem Solving.*** The district uses a Teacher Support Team problem-solving approach for supporting teachers with students having learning and behavior challenges. The model is especially successful when principals support the process with their leadership.

Areas of Concern

- ***PPSD lacks a districtwide policy and comprehensive RTI framework for reading, math, and behavior*** that includes expectations for school-based practices at all school levels. This void has slowed the positive effects that an effective implementation of this model might have on student performance. Furthermore, if a student does not improve his/her academic work or behavior, the reason could lie in the appropriateness of instruction and intervention rather than in the student's ability *per se*. This lack of clarity about what is causing the difficulty has important implications for the application of needed special education services. Other concerns include—

- inconsistent and nonexistent practices at some elementary, middle and high schools
 - lack of consistent differentiated instruction
 - lack of effective models for scheduling time and personnel for interventions
 - professional development in schools without schoolwide participation
 - progress-monitoring data collection being hindered by personnel resistance, by lack of tools in math and writing, and by the need for a valid and reliable screening tool for language acquisition for ELL preschoolers
 - the lack of common language regarding the development of behavior plans and use of behavioral interventions, such as “check-in and check-out”
 - too few schools with tier 3 community-based “wrap around” services for students needing intensive social/emotional support
 - the lack of clarity on the relationship between personal-learning plans and RTI.
- ***Curriculum and instruction do not have a strong and obviously visible leadership role in the development and communication of RTI***, which requires strong collaboration by special education and ELL offices. The process has had a strong special education influence out of necessity, as the state requires that a student’s eligibility for special education in the area of LD be based, in part, on the student’s response to intervention.³¹ As a result, the district needed to have an RTI system in place. However, RTI’s special education influence has had the following negative consequences: It has created (1) a perception that RTI is a pathway for special education services and has spurred frustration when the process takes too long to produce an outcome; (2) a perception that the teacher support team is a special education process rather than an integral problem-solving component of RTI; and (3) an overreliance on special education teachers, related service providers, and teacher assistants, which appears to excuse other potential service providers from participating. Also, this perception was responsible in part for the slow initiation of a math progress-monitoring tool because RTI was not viewed as a general education initiative. Moreover, the strong special education leadership and lack of accountability for PBIS implementation feeds a misperception that classroom management is not a priority for all students.

Recommendations

5. ***Develop and implement a comprehensive RTI framework that addresses, at a minimum, reading, math, and positive student behavior, along with accountability for results.***
 - a. ***Establish general education leadership with expert support.*** To reinforce the notion that the RTI process is based in general education practices (but could also be accessed by students receiving special education and ELL support), establish a team of stakeholders that is led by the chief academic officer. Similarly, expand the district’s

³¹ RTI was required September 1, 2010 for elementary schools and will be required September 1, 2011 in high schools.

PBIS leadership team to include a diverse group of stakeholders, including the three executive directors, principals, teachers, behavior coaches, etc., to discuss the various tiers of PBIS, including the social/emotional learning needs of students. Ensure that the stakeholder and leadership groups meet periodically to ensure that the processes are aligned and coordinated and that PBIS is seen as a function of the RTI process.

b. *Establish RTI/PBIS framework, policies, and procedures.* To promote a common language for implementing RTI and for professional development to support RTI, develop a written framework, policies, and procedures for both academics and positive behavior that include the following:

- Core curriculum expectations and use of universal design for learning (UDL).³² UDL is based on strategies that enable curricula to be accessed easily by students with different abilities and needs. It is well integrated into everyday instructional practices and includes multiple methods of presenting information using multiple media and other methods of engaging students interest and assessing what students have learned.
- Universal screening and progress-monitoring tools appropriate for elementary, middle, and high schools.
- Three levels of increasingly intensive research-based interventions that will be available short and long term.
- Revised behavior intervention plans (BIP), including research-based components.³³
- Standards for supporting interventions that are research-based, specific enough to monitor for fidelity at multiple grade levels, and appropriate for differing content levels.

³² Through differentiated instruction, teachers instruct students of differing abilities to maximize each student's growth and individual success by meeting each student where (s)he is and assisting in the learning process. To differentiate instruction, one must recognize students' varying background knowledge, readiness, language, preferences in learning, and interests and react responsively. Through a Universal Design for Learning (UDL) approach, curriculum is initially designed with the needs of all students in mind, so that methods, materials, and assessment are usable by all. Traditional curricula present a host of barriers that limit students' access to information and learning where printed text, in particular, is especially problematic for students without a well-developed ability to see, decode, attend to, or comprehend printed text. A UDL-designed curriculum is innately flexible and enriched with multiple media, so that alternatives can be accessed whenever appropriate. UDL takes on the burden of adaptation so that the teacher and/or student does not have to, thereby minimizing barriers and maximizing access to both information and learning.

³³ See information provided by the Center for Effective Collaboration and Practice at <http://www.ledweb.com/fba%20forms.htm> and sample forms at <http://www.ledweb.com/fba%20forms.htm>.

- Models for scheduling and using the broadest range of intervention providers.
- Parameters for performance-learning plans and teacher-support teams and for how problem-solving is/will be incorporated into the RTI process.
- Guidance (1) on determining how much progress a student should be making when provided with appropriate research-based interventions and (2) on initiating a referral for special education services when sufficient progress is not made after providing the appropriate interventions.
- Expectations for the providing and requiring staff participation in RTI professional development.
- Parental involvement and access to information.

Use a cross-functional team of individuals from various departments, along with elementary, middle, and high school personnel to provide input and feedback on the initial draft policies and procedures.

c. Identify the core information that various staff members need about RTI/PBIS, and develop a comprehensive and differentiated professional development program that:

- Uses multiple formats (e.g., videos, webinars, PowerPoint, narrative text) and presentation models (e.g., school-based, small groups, etc.) that are differentiated, based on current levels of staff knowledge and skills
- Uses cross-functional teams with individuals who directly support schools in order to provide primary training to the broadest spectrum of administrative and instructional staff, so they can help provide direct support, mentoring, coaching, and technical assistance to principals and teachers.
- Ensure that all trainers are knowledgeable and effective presenters. Provide professional development so that all staff members who need training receive it and are able to demonstrate its use.
- Consider mandating training and providing a certificate of demonstrated performance.
- Modify walk-through protocols to include the standards, monitor the extent to which school practices conform to the guidance, and initiate technical assistance, professional development, coaching, and mentoring as necessary to improve practices.

d. Collect, analyze, report, and follow up on student behavior-related data. Determine how the School-Wide Information System (SWIS) and other data systems can be

modified to ensure access systemwide and are capable of yielding user-friendly reports to relevant staff in order to promote analysis and follow-up action.

- e. Identify demonstration-schools and exemplary staff.* Identify schools that have implemented various aspects of the RTI framework for other schools to visit and emulate. Identify staff members who reflect these standards and who could provide training to their peers
- f. Monitor implementation and effectiveness.* Modify walk-through protocols and checklists to reflect core practices and monitor the extent to which school practices conform to the guidance. For PBIS, incorporate Special Education Technology (SET) standards and supplement them for RTI's academic practices.

Instruction in General Education Classes with Supplementary Aids and Services

Positive Observations

- *Improved Educational Setting Data.* The Council's team heard generally positive comments about the district's movement toward implementing inclusive instructional education for students with disabilities. PPSD has taken steps to increase the percentage of students educated in general education settings for a greater part of the day and to reduce the extent to which they are educated outside of the district in private, separate schools.
 - A higher percentage of PPSD students with disabilities are educated in general education classes at least 80 percent of the time, compared with the nation. This rate has been increasing slowly since 2007. Similarly, the percentage of students educated in general education less than 40 percent of the time has decreased somewhat.
 - A smaller percentage of PPSD students with disabilities are educated in separate schools, compared with statewide rates.
- *Less Disparate Educational Setting Rates by Race/Ethnicity.* PPSD data on educational setting are not very different by race/ethnicity from the state's figure that 66.2 percent of students getting special education services are placed in the general education setting at least 80 percent of the time. Also, the likelihood of being placed in separate classes has decreased over time for Hispanic, White, and Black students.

- ***Awareness of Differentiated Instruction.*** District personnel are generally aware of the need to differentiate instruction for students with disabilities, particularly at the elementary and middle school levels. Some good models appear to be in place.³⁴
- ***Inclusive Preschool Initiative.*** To provide preschoolers with disabilities an inclusive educational setting, the district has an initiative that enrolls nondisabled peers using a lottery system to diversify classrooms.
- ***Expansion of Co-Teaching.*** The district is expanding its co-teaching approach for the upcoming school year at all levels. Trained special education specialists will serve as coaches and provide embedded professional development during in-class instruction. Some good models of co-teaching are already in place. Generally, focus group members supported inclusive educational opportunities for students receiving special education services. In addition, special education directors and supervisors have provided and will continue to provide professional development to special and general educators in 2011-12 in the area of co-training, focusing on teaching models and strategies and differentiating instruction.
- ***Pilot Middle and High School Inclusion Initiative.*** The district initiated pilot programs that enabled students previously educated in self-contained classes to attend general education classes with the support of a special education teacher in order to compensate for the lack of teachers with expertise in core content areas. All teachers in the pilot program received professional development involving school-based working sessions for co-teachers to plan and develop an appropriate co-teaching environment.

Areas of Concern

- ***Failure to Meet SPP Targets.*** PPSD has not met the state's targets for educating students with disabilities in the two SPP general education setting categories (at least 80 percent of the time and less than 40 percent of the time) described earlier. And it has not met targets for educating students in separate schools.
 - A much smaller percentage of the district's students with autism, ED, intellectual disabilities, and multiple diagnoses are educated in general education classes for at least 80 percent of the time than in the nation.
 - Other than in the areas of speech/language and multiple diagnoses, a larger percentage of PPSD students in every disability area are educated in separate classes for most of the school day than in the nation. The disparity is especially apparent in areas of other health impairment, ED, and intellectual disability.

³⁴ Note that differentiated instruction is also needed for students without disabilities, ELL students, and students receiving special education in separate self-contained classes.

- Compared with the nation, PPSD places a larger percentage of students who have ED and multiple diagnoses in separate schools (day and residential).
- ***Comparatively Low General Education Settings Rates.*** The district has very few students with disabilities who are in general education between 40 percent and 79 percent of the time. Although the percentage has nearly doubled between 2006 and 2010 (2.4 to 4.1 percent), it is a far smaller rate than the nation's 21 percent. Therefore, students are either in general education for at least 80 percent or less than 40 percent of the day, with very little presence in the middle range.
- ***Educational Settings Disparity by Race/Ethnicity.*** When examining PPSD students by race/ethnicity who receive instruction in separate classes or schools, we find that:
 - District students of all ethnic/racial groups are more likely to receive special education services in separate classes than their state peers. Between 2006 and 2010, the likelihood increased slightly among Whites and to a greater extent among Native Americans.
 - Among students placed in separate schools, White students continue to have a high likelihood and Black students a slightly higher likelihood of such placement.
- ***Inconsistent Use of Differentiated Instruction.*** Although it is essential for instruction to be differentiated for students with disabilities in order for them to successfully access core curriculum in general education classes, the practice is not being implemented effectively and consistently in every school and class. Concerns include classes in which the percentage of students with disabilities exceeds 30 percent and resistance by some teachers, especially at the high school level.
- ***Lack of Expected Practices for Inclusive General Education Instruction.*** The district does not appear to have expected or model practices for educating students with disabilities in general education classes that would drive professional development and accountability. If students are not provided adequate support in general education, there may be more pressure to place students in separate classes and schools.
- ***Lack of Special Educators with High Degree of Content-Area Expertise.*** By and large, special educators do not have the knowledge and expertise to be the primary instructor in core content areas, a situation that affects students in general education, in self-contained classes, and at the separate Birch Vocational Center.
- ***Inconsistently Effective Co-Teaching.*** A variety of concerns were raised that affect the quality of co-teaching, including inconsistent and effective implementation, ineffective partnering and role designation for special and general educators, irrelevant IEP goals, lack of interaction and planning opportunities between educators and teacher assistants, and inadequate access to needed materials and supplies.

- ***High School Inclusion Challenges.*** At the high school level, special educators continue to be students' teacher of record, even when the students are receiving instruction in general education classes. The educational setting of these students was unclear: it was alternately referred to as "self-contained" and "co-taught" in general education. Furthermore, separate special education classes continue to be labeled as "fundamental," and because instruction is not based on the core curriculum, students taking regular assessments do not receive relevant and aligned instruction, and the courses do not lead to a regular high school diploma.

Recommendations

6. ***Establish a bold vision of PPSD as an inclusive school district that provides students with disabilities with the supplementary aids and services they need to meet Rhode Island's Common Core Standards.*** Establish and implement a written vision, school board policy, and framework in order to support PPSD's transformation to a model district that actively works toward providing a growing number of students with disabilities consistent and beneficial access to instruction in general education classes for the majority of the day. Steps include the following:
 - a. ***Establish a visible and collaborative general education presence to lead the implementation of a new board policy and initiative.*** Given the clear and convincing evidence of the benefits of educating students with disabilities in general education settings, it is important that efforts to increase the percentage of students educated in this setting become a systemwide priority and that the superintendent and chief academic officer provide leadership on behalf of this priority, with meaningful support from special education and ELL staff. Ensure that the policy includes a district commitment to provide students with disabilities, including those who are ELL, with general classroom experiences with appropriate supplementary aids and services to allow students to be successful. In addition, emphasize the placement of students with disabilities in their home schools (or school they would attend if not disabled) to the maximum extent possible. Communicate this vision widely to all constituents, along with the process that will be used to support students. Charge a diverse group of stakeholders (including general, special, bilingual, and gifted/talented educators and those with a working knowledge of research-based inclusive practices) with implementing the board's vision and policy.
 - b. ***Incorporate the academic and behavioral progress of students with disabilities and the implementation of effective programs on their behalf into the evaluations of principals and senior instructional staff in the central office.***
 - c. ***Design and implement the infrastructure needed to execute PPSD's inclusive school vision and policy; establish school-based plans for implementation.*** Based on the issues summarized in this report and others known to stakeholders, develop measurable research-based standards and goals in the following areas:

- Differentiated instruction for students with varying abilities in reading, math, and cognition.
- Goals for decreasing the percentage of students with disabilities in general education classes performing substantially below peers in reading and math and with measures of “substantially below peers.”
- Expected supports for students with disabilities, including ELLs in general education (or bilingual/ESL) classes involving (1) special educator instruction and paraprofessional support inside and outside classes for short periods of time, (2) the amount of co-teaching for varying parts of the day, and (3) varying amounts of instruction outside the class using flexible groupings of students. Articulate key measures for such models, including teacher collaboration, flexible inter- and intra-class groupings, active learning, and student needs for study/organization skills.
- Expected implementation of RTI/PBIS and social skills curricula and programming.
- Incorporation of tiers 2 and 3 intervention goals into IEPs as necessary in order to significantly improve performance.
- Effective scheduling of classes (with models for block scheduling and scheduling of general education classes for students with IEPs before others), and expectations for common planning time and information sharing between special/general educators and paraprofessionals.
- Effective pairing of co-teaching personnel, including taking into account desires of personnel involved.
- Clarification of roles of classroom and subject-area teachers, resource teachers, special educators, and paraprofessionals.
- Adequate materials and supplies.

Consider the proposals and information from the following three documents, which the Council’s team has provided to the PPSD special education directors under separate cover:

- “New Teacher Teams to Support Integrated Comprehensive Services.” Frattura, E. and Capper, C. (2007), *Teaching Exceptional Children*, Vol. 39, No. 4, pp.16-27, (2007)
- “Planning Differentiated, Multicultural Instruction for Secondary Inclusive Classrooms.” Van Garderen, D. and Whittaker, C. (2006), *Teaching Exceptional Children*, Vol. 38, No. 3, pp. 12-20.

- “Students with Severe Disabilities and Best Practice.” From Frattura, E. and Capper, C. (2007), *Leading for Social Justice: Transforming Schools for All Learners, Providing Access to High-Quality Teaching and Learning*, Chapter 9: Students Who Significantly Challenge Our Teaching.

Visit classes in the district that reflect the desired goals and standards set by the board and the cross-functional team, and discuss with staff what has worked well, what their challenges have been, and what suggestions they have.

- d. Expand instruction in general education between 40 and 79 percent of the time for students currently in more restrictive settings.* Analyze the district’s low number of students receiving instruction in general education between 40 and 79 percent of the time and how scheduling and staff support may have to change in order to educate in this less restrictive setting more students who are currently in self-contained classes. Based on this analysis, incorporate planning into the other components of Recommendation 6.
- e. Build on the differentiated professional development in RTI/PBIS to impart the knowledge necessary to implement PPSD’s framework and standards for inclusive instruction.* Identify the core information that various staff members need to:
 - Coordinate and build on the professional development provided in RTI/PBIS, using multiple formats (e.g., video, Webinar, PowerPoint, narrative text) and presentation models (e.g., school-based, small groups).
 - Use cross-functional teams involving individuals who directly support schools to provide primary training to the broadest spectrum of administrative and instructional staff, so they can help provide direct support, mentoring, coaching, and technical assistance to principals and teachers.
 - Ensure that all trainers are knowledgeable and effective presenters. Implement professional development so staff members who need training receive it and are able to demonstrate its use.
 - Consider mandated training and implementing a certificate of demonstrated performance.
 - Modify walk-through protocols to include the standards, monitor the extent to which school practices conform to the guidance, and initiate such supports as technical assistance, professional development, coaching, and mentoring to improve practices.
- f. Establish a timely communication and feedback process to share solutions to implementation barriers.* Several problem areas are likely to require a targeted group of knowledgeable people to resolve implementation issues as they arise. For example,

schools often have difficulty providing services with existing staff and would benefit from feedback from individuals able to analyze the situation, give meaningful suggestions, and recommend different staffing arrangements.

- g. Use a school-based process for planning the framework's implementation.*** Provide a template that includes the core components necessary to support successful inclusive practices: school-based planning, professional development, data gathering, and review, and support for plan implementation. Integrate the plan with the school-based RTI process described previously and with school improvement plans.
- h. Initiate school-based targets, monitoring, and support.*** Collect and analyze data by school on students newly placed in general educational settings by the various disability categories monitored by the state. Establish targets for each school that would enable the district as a whole to meet or exceed state performance targets, and distribute reports showing school performance against these targets to district and school-based administrators. (Base personnel evaluations, in part, on progress on these targets.) Follow up and provide technical assistance as appropriate when outcomes fail to meet reasonable expectations. (Additional recommendations are provided under section E, Accountability.)
- i. Identify schools with general education classes having more than 30-40 percent of students with disabilities and analyze causes for the large percentages and explore possible ways to decrease the impact.*** For example, if the large percentage is due to the clustering of students in special programs at a particular school, then the district may want to look at how services might be reallocated so these students can be supported in the school they would normally attend if not disabled.³⁵
- j. Document how PPSD will accomplish the above.*** Identify staff accountability, roles and responsibilities, time frames, and demonstrable outcomes.

Instruction in Self-Contained and Private Settings

Positive Observations

- ***Redistribution of Self-Contained Classes.*** The district's redistribution of self-contained classes to fewer schools enables some students to stay at the same school for their elementary grades and in classes with fewer grade levels.

³⁵ See article sent to district staff under separate cover for additional information on this topic: Students with Severe Disabilities and Best Practices, from Frattura, E. and Capper, C. (2007), *Leading for Social Justices: Transforming Schools for All Learners, Providing Access to High-Quality Teaching and Learning*, Chapter 9: Students Who Significantly Challenge Our Teaching.

- ***Model High-Quality Instruction for Students with Autism.*** The autism program appears to be well respected and is supported by a team of individuals with knowledge and expertise in this area. RIDE designated Hope High School's class as a model site.
- ***Structured Behavior Intervention Program.*** The district has a structured separate-class model for providing support to students with challenging behavior. Coaches, as well as a team of multidisciplinary personnel, are available to provide supports to teachers and students. The provision of an additional 10 days per year provides coaches with more time to collaborate and plan. Staff members receive professional development on how to analyze behavioral data and support students with challenging behaviors.
- ***Reduction of Private School Placements and Tuition Rates*** The percentage of students with disabilities placed in private out-of-district schools fell from 6.0 percent in 2009-10 to 4.0 percent in 2010-11. By reducing the number of private schools used by the district, the special education director was able to negotiate a reduced rate with four private schools.

Areas of Concern

- ***Reliance on Self-Contained Classes.*** It is extremely difficult to provide students with disabilities access to grade-level core curriculum when the class includes students in more than one grade. Furthermore, the lack of special educators with content-area expertise makes it difficult to conduct effective instruction. Students in middle and high schools who are not participating in the pilot inclusion program continue to be educated in separate classes. In addition, administrative concerns, such as general education classes at capacity, scheduling conflicts, and insufficient staff support sometimes hinder the inclusion of more students with disabilities in general education classes.
- ***Additional Support Needs for Students with Autism.*** Although focus group participants expressed concerns about the need for additional equipment and supplies, such as weighted vests and a pool of substitute teacher assistants, the team noted that a much larger proportion of PPSD students with autism were educated outside of general education classes for more than 60 percent of the day (71 percent), compared with their peers nationwide (50 percent).
- ***Additional Support for Students with Intensive Social/Emotional Needs.*** Numerous concerns were raised regarding the challenging behavior of students, including those without disabilities. At PPSD, only 23 percent of students with emotional disturbance are in general education classes for at least 40 percent of the time, compared to 56 percent nationwide. To the extent that students with behavioral issues are not supported successfully within general education, more are placed in self-contained settings. And when they are not supported successfully within this setting, more are considered for private placements. In this respect, serious personnel issues—lack of sufficiently trained teachers and teacher assistants, union assignment practices, and lack of teacher-assistant

substitutes--hinder the addition of more Behavior Intervention Program classes for students returning from private out-of-district clinical placements. Although a supportive supervisor works with the Behavior Intervention Program, the individual is responsible for schools that do not have this program and also is not assigned to all schools with the program.

- ***Return of Students to Private Schools.*** Students in the district's Behavior Intervention Program in secondary schools with unsuccessful outcomes will be returning next year to out-of-district private schools. This will weaken the district's capacity to educate students with challenging behavior. According to focus group members, the district's ability to contract with private schools to provide support in district schools--a successful model used by other districts--is not an option because of union contract issues.

Recommendations

7. Reduce reliance on educating students with disabilities in self-contained and separate school settings; improve performance of students remaining in these settings.

- a. Collect and analyze data*** about students currently educated in self-contained and separate school settings, such as the school they would attend if not disabled; their performance levels in reading, math, and behavior; and other information relevant to the supports they would need if educated in general education classes for greater periods of time. (Investigate whether the district's data on separate schools include students from the Birch Vocational Center.)
- b. Identify characteristics of students in order to plan for less restrictive settings.*** Identify the characteristics of students who could attend their local school or school of choice and the supports they would require to do so. Address current administrative barriers to more inclusive instruction, such as "full classes," scheduling, etc., bringing issues to the superintendent's cabinet when necessary. Through the IEP process, consider implementation on an individualized basis in midyear 2011-12 and/or September 2012.
- c. Use a consultant for advice about educating more students with autism within general education classes.*** Consider using a consultant who has significant experience with the successful education of students with autism who are in general education for a greater portion of the day, and follow up on specific recommendations. To prepare for such consultation, gather data on students' attendance-area schools, ages, school grades, academic performance, social/emotional and language skills, equipment and supply needs, etc.
- d. For students with significant behavior challenges, implement improved social/emotional supports at each school and address the personnel issues affecting the Behavior Intervention Program.*** It is essential that more students be educated successfully in general education classes in order for the district to have the capacity to

support those with the most intensive needs. Identify any schools with an unusually large number of students being referred to separate settings or to separate schools. In both circumstances, consider the strength of current PBIS efforts at tiers 2 and 3 and need for improvement. It is anticipated that recommendation 5 regarding PBIS and social/emotional support will improve school capacity.

- *Improve the Behavior Intervention Program.* Section D below addresses personnel issues related to the provision of substitutes for paraprofessionals, assignment of highly skilled special education teachers and paraprofessionals, and administrative support. In addition, consider asking the district’s consultant, Dr. Diana Browning Wright, to review the Behavior Intervention Program’s current structure and make recommendations, including training for behavior coaches and teachers, to implement evidence-based behavioral strategies for tier 2 and 3 interventions.
 - *Investigate private school interest in collaborating with the district to provide supports to students in PPSD schools and, if there is sufficient interest, identify and address any contractual barriers to such collaboration.* The district should aggressively pursue this course of action to support students with significant social/emotional issues.³⁶
- e. Eliminate “fundamental” courses.* Review current secondary courses and their descriptions to ensure that students with disabilities who take the regular NECAP assessments are not given separate “fundamental” courses. These students should have access to core curricular standards—with accommodations—if they are to have any chance of improving performance on assessments. Recommendations 5 and 6 provide additional information on supporting students with disabilities taking classes aligned with the core curriculum.

In addition to personnel issues discussed above, section D addresses strategies for increasing the number of special education teachers who are highly qualified and knowledgeable in core curricular areas.

English Language Learners with Disabilities

Positive Observations

- *Support for ELLs with Disabilities.* Teachers reported that ELLs, including those with disabilities, are benefiting from the reading intervention Language!

³⁶ The School District of Philadelphia has used this model.

Areas of Concern

- ***Need for Additional Support for ELLs with Disabilities.*** ESL teachers do not support students with disabilities who are also ELL in either regular general education or non-ESL self-contained classes. For an ELL student to receive special education services in another setting, the parent must waive the student's right to receive language support. Concerns include a disproportionately high number of students with IEPs in some ESL and bilingual classes; resistance to providing accommodations to students in the gifted or talented program; and an insufficient number of ESL-certified teachers to support or scaffold student language development.

Recommendations

8. ***Identify and provide more flexible models to support the education of ELLs with disabilities.*** Establish a working group with staff members from general education, ELL, special education, gifted and talented, research and accountability, and schools to review research-based practices on language acquisition and on providing language support to students with disabilities (without a waiver) in a manner that would enable them to be successfully educated in classes they would attend if not disabled. As part of this process, consider how bilingual/ESL staff can help improve the effectiveness of monolingual staff to provide instruction and services to ELLs with disabilities and share information through professional development, technical assistance, co-teaching, etc. In addition, consider how special and general education teachers who are not ESL-certified and paraprofessionals can receive training on effective strategies to support or scaffold student language development. Based on the results of this work, (1) establish relevant board policy, (2) include relevant activities in school-based planning in RTI and inclusive education guidance, and (3) implement professional development activities, revised walk-through protocols, etc. Also, consider any data changes necessary in REG (the district's student information system) to support differing service models for ELL students. [See ELL Report prepared by the Council of the Great City Schools in conjunction with this report.]

Postsecondary Transitional Activities and Services

Positive Observations

- ***Almost Met SPP Indicator 13.*** With a rate of 97 percent, the district almost met the rigorous federal mandate of 100 percent compliance for youth 16 years and above with an IEP that met several compliance standards.
- ***Strong Partnerships with Agencies and Parent Organizations.*** Generally, PPSD has a strong system of transition services and activities, as reflected by a strong partnership with RIDE and ORS, a grant-funded transition director, an ORS Councilor in every high school, a high school elective transition course, and strong collaboration with the Rhode Island Parent Information Network. The district/ORS-funded Project WORK annually helps 30

ORS-eligible high school students with disabilities to consider career choices, postsecondary education options, and internships.

- ***Birch Vocational Center Post-School Support.*** Birch Vocational Center personnel provide liaison between agencies, students, and families to provide post-school support.
- ***Transition Academy Outcomes.*** Eight of the 14 fifth-year high school students attending the district's university-based Transition Academy had found employment at the time of the Council team's visit.
- ***Electronic Transition Planning.*** The district has purchased a comprehensive electronic support system for transition planning that is ready for installation.³⁷

Areas of Concern

Generally, youth with disabilities do not succeed as well as nondisabled peers in postsecondary education and training, employment, living arrangements, and community participation. For example, 30 percent of people with disabilities report being employed full or part time, compared with 70 percent of those without disabilities. People with disabilities are three times more likely to live in poverty and have an annual household income below \$15,000 (26 percent versus 9 percent for people without disabilities). And 34 percent say they are satisfied with life, compared with 61 percent of individuals without disabilities.³⁸

In addition, youth with intellectual disabilities exiting high school represent the only disability category not experiencing earnings above minimum wage. Data from the national vocational rehabilitation database show that youth with intellectual disabilities who participated in some type of postsecondary education were 26 percent more likely to leave vocational rehabilitation services with a paid job than peers who had not participated in postsecondary education. Further, their weekly income was 73 percent higher.³⁹

In light of the above, there are a variety of concerns about the extent to which PPSD is preparing students with disabilities for post-school life:

- ***Minimal Access to Community-based Training.*** The district lacks a systemic transition framework that reflects expectations for supporting community-based training and work opportunities for students with disabilities. Instead, every building appears to act independently, and some are able to provide better experiences than others. For youth with disabilities, however, research shows that work experience

³⁷ <http://www.tensigma.org/products/index.html>

³⁸ 2004 National Organization of Disability/Harris Survey of Americans with Disabilities at http://www.nod.org/research_publications/nod_harris_survey/

³⁹ 2004 National Longitudinal Study, Postsecondary Education and Employment Options for Students with Intellectual Disabilities at http://tacesoutheast.org/webinars/2011/020311/ppt/ppt020311_files/outline/index.html.

during high school helps them get jobs at higher wages after they graduate.⁴⁰ Secondary school students with disabilities, who worked for pay outside the home in the year before exiting school and/or participated in a work-study program at school, have a better chance for employment in their post school years than if they had not participated in such activities.⁴¹ Given the importance of this finding, SPP's indicator 14 measures transition outcomes for youth with IEPs who are no longer in secondary school and who are within one year of exiting high school, looking at their participation in higher education, training, and/or employment. RIDE reported that the district's overall rate was 66.2 percent in 2009-10, while the state target was 75.9 percent.⁴²

- ***Project WORK Limitations.*** Concerns about Project WORK include the need for students to be transported by bus rather than another vehicle and student nonparticipation because of fear that their being paid for work will negatively impact SSI or SSDI funds. Students and their families do not fully comprehend the benefits they might receive from this work experience.
- ***Birch Vocational Center Limitations.*** Almost all of the district's students identified as having an intellectual disability at the secondary level attend Birch Vocational Center, a well-staffed school for students with disabilities. Concerns about the school's provision of instruction and transitional activities and services for students—half of whom reportedly participate in the regular statewide assessment—include (1) access to the curriculum “at a very low level,” (2) no expectation that students graduate with a regular diploma, (3) the fact that only one student takes public transportation to school, (4) access only to a sheltered workshop experience, (5) an attitude that immunizations required for hospital and medical center worksites would be harmful to students, and (6) limited interaction with the community. There appears to be no real desire to change the situation.
- ***Transition Academy Limitations.*** The successful university-based Transition Academy is limited to just 14 students.
- ***Limited Use of Electronic Transition System.*** Due to unresolved problems, the district's impressive electronic transition system has not been downloaded for use in

⁴⁰ National Collaborative on Workforce and Disability/Youth, Hot topic: Work-Based Learning, 2003 Volume 2

⁴¹ Changes over Time in the Early Postschool Outcomes of Youth with Disabilities: A Report of Findings from the National Longitudinal Transition Study (NLTS) and the NLTS2.

⁴² Although not yet reported, the state's target for the first year of the outcome's application in 2010-11 is: 33% in higher education; 67 percent in higher education or competitively employed, and 78 percent in higher education or in some other postsecondary education or training program, or competitively employed or in some other employment within one year of leaving high school. These outcome targets increase by one percentage point each year.

every high school. This system could help PPSD to meet its 100 percent target for indicator 13 and improve transition outcomes for students.

- ***Inconsistent Data.*** The Council’s team was informed that the district’s compliance rate for indicator 13 (meeting IEP transition-compliance standards) was 90.4 percent, which is lower than the RIDE reported rate of 97 percent. This issue will be addressed below under section D on the use of technology and data.

Recommendations

9. Develop a districtwide, comprehensive, and coordinated vision for transition services; plan to implement this vision. To provide a research-based system of transition services and activities, review current activities to determine the extent to which they align with the 16 evidence-based predictors of post-school employment, and success in independent living, found in the correlational study published by the National Secondary Transition Technical Assistance Center⁴³ and the National Center for Workforce Development website.⁴⁴ (See appendix A: Evidence-Based Predictors of Post-School Employment, Education, and Independent Living Success for a description of these predictors, which include the domains of education, employment and independent living.) Conduct this review with appropriate school-to-careers personnel, and identify and address any gaps. In addition:

- a. Ensure the Birch Vocational Center operates consistently with research-based practices.*** As part of the review above, and with the involvement of Birch parents and staff, conduct a comprehensive analysis of the Birch Vocational Center to determine the extent to which the program is aligned with accepted research sources. Also, obtain information on the school’s budget and per pupil cost. Based on the results, prioritize any programmatic components that require change, and develop a cost-neutral implementation plan that includes an aggressive time frame.
- b. Expand community-based supportive work and employment.*** Develop a working group of diverse stakeholders (including business, community, state agencies, special education personnel, staff from high schools, and the Birch Vocational Center) to review district practices in community-based work and employment, and establish measurable standards for school-based practices at every high school. As part of this process, identify and address barriers, including access to transportation for Project WORK, and steps to be taken that would enable students to engage successfully in this

⁴³ National Secondary Transition Technical Assistance Center. (2010). *Evidence-Based Practices and Predictors in Secondary Transition: What We Know and What We Still Need to Know*. Charlotte, NC: Author. Retrieved from www.nsttac.org/ebp/ExecsummaryPPs.pdf

⁴⁴ <http://www.ncwd-youth.info/ksa/competency-05>

activity. For example, engage and educate students/parents about the benefits of work experiences and how any payment for work may (or may not) impact federal benefits.

- c. Research the need and possibilities for expanding the Transition Academy.* Identify how many students might benefit from enrollment in the Transition Academy. Assuming the number is more than 14, share the information with partner agencies and Johnson and Wales University to identify ways to meet this need.
- d. Ensure Electronic Transition System Is Fully Implemented.* Resolve outstanding issues with implementing the new electronic data system and, ensure that it is put into place at all district schools.

Section D. Support for Teaching and Learning

This section addresses various ways in which PPSD provides support for the teaching and learning of students with disabilities. It focuses on the following areas: special education management and organization, staffing patterns and usage, parent support and involvement, professional development, and use of technology and data.

Special Education Management and Organization

About 4.5 years ago, the new chief academic officer moved the special education unit from a stand-alone office to become part of the district's teaching and learning team. This change is credited with enabling special education to be part of the decision-making process about standards, curriculum, and programming throughout PPSD. It has also helped students with disabilities participate in education reform and gain greater access to core curriculum. As indicated from information provided by the district: *[T]he voice of special education is definitely at the table now, always advocating for the needs and benefits of students with disabilities.*

Directors of Special Education

Two directors provide special education leadership: One is responsible for elementary-level schools (including preschool programs) and the second is responsible for secondary-level schools (middle and high). In addition, they have some similar and some different programmatic responsibilities. A full-time secretary assists each director. Both directors have the following responsibilities relevant to elementary or secondary schools:

- Coordinate and supervise the quality of special education programming and services
- Establish and monitor procedures on child outreach, screening, eligibility, assessment, IEPs and services for students with disabilities
- Ensure IEPs are implemented with appropriate accommodations and modifications to meet the diverse needs of students with disabilities
- Supervise behavior intervention programs
- Oversee placement and instruction in private schools
- Recruit special education and clinical personnel
- Hire and train teacher assistants
- Coordinate professional development
- Oversee Medicaid billing
- Coordinate alternate assessments
- Monitor special education supervisors, specialists, and related service providers
- Serve as members of the district's teaching/learning team and elementary/secondary level team
- Serve at the elementary school level as the supervisor of four schools and at the secondary level the supervisor of two high schools.

Special Education Supervisors

The eight special education supervisors are primarily responsible for overseeing special education programs at an average of 4.6 schools each (ranging from one to seven). The supervisors assist with the monitoring, development, and implementation of quality special education programming and services, including co-teaching programming, related services providers, IEP development, and specialized programs (e.g., BIP, autism, etc.), as well as compliance with special education laws and regulations. An individual secretary assists each of the supervisors.

Elementary-level directors lead evaluation teams and chair meetings to determine student eligibility for services, develop initial IEPs, make disciplinary manifestation determinations, and review referrals for special education evaluations and appropriate follow-up. As discussed below, secondary-level directors will no longer carry out this function in September 2011, when it will be taken over by school-based teacher leaders.

As members of PPSD’s teaching and learning team, the role of the supervisors has expanded from one focused mostly on compliance to one that now includes instruction. They work closely with curriculum supervisors by participating in curriculum writing/implementation, school learning-walks to enhance teacher quality and instruction, and grade-level principal and leadership meetings. In addition, supervisors have programmatic responsibilities at each grade level (e.g., alternate assessments) and at the district level (e.g., electronic IEP). (See exhibits 41 and 42.)

Exhibit 41. Elementary-Level Organization

Elementary Director – Directly supports four elementary schools TST, PBIS, bullying and harassment procedures, early intervening disproportionality team, technology department liaison, census data, parent local advisory committee				
Four Supervisors	Seven Schools Parent liaison and Local Advisory Committee OTs, PTs ED placements Behavior programs Physical restraint training Cab vouchers	Six Schools Speech therapists Audiology RTI technical assistance Compliance	One School Preschool teams and preschool programming Early Care/Education Community PreK creative curriculum.net Early intervention transition Bilingual team Assistive technology Child outreach, coordinator, screening Alternate assessment	Six Schools Medicaid Psychologists Easy IEP Elementary interpreters
	Four intervention/special education specialists paired with supervisors; act under director’s supervision			

Exhibit 42. Secondary-Level Organization

Secondary Director- directly supports two high schools Autism team, transition, vision services, budget, 504, interim middle school				
Four Supervisors	Four Schools	Five Schools	Three Schools	Five Schools and Transition Academy
	IEP training – basic II Inclusion, intensive resource, self-contained programs Child care workers TST Transition Easy IEP Local Advisory Comm. Social Workers	Vision/mobility Placements Procedural manual Local Advisory Comm. TST Transition team Inclusion Co-teach team	ESY Local Advisory Comm. TST Home instruction Psychiatric appointments	Alternate assessments Procedural manual Community Fair 504 ESY Adapted physical education
Four intervention/special education specialists paired with supervisors; act under director’s supervision				

Intervention/Special Education Specialists

Two years ago, the district employed 25 diagnostic-prescriptive teachers at the pre-kindergarten to grade 12 levels who completed formal education evaluations, attended IEP meetings, and assisted in the development of IEPs. All 25 positions were eliminated and 11 special education specialist positions were created to provide support, professional development, and training in RTI and special education. Specifically, these individuals support the teacher support-team process, including differentiated instruction, co-teaching, transition, and compliance. Of the 11 specialists, eight are paired with special education supervisors and work under the direction of the special education directors, and three of the specialists work in the area of preschool and perform duties more like those of the previous diagnostic-prescriptive teachers. The school district contracted with a facilitator during the past two years to provide professional development to the specialists to assist them in the areas of coaching, co-teaching, differentiating instruction, and IEP development.

- ***Elementary-Level Specialists*** (1) participate in IEP meetings as the LEA representative; and (2) provide training to psychologists, social workers, and special educators on case management activities, e.g., inputting data in the evaluation log; conducting formal educational testing; and assisting with progress monitoring. They also provide embedded professional development in the area of co-teaching strategies and models, provide formal professional development to all teachers, and evaluate team members and teacher assistants at the elementary level on such topics as learning disabilities identification and effective strategies for working with students with disabilities. The elementary schools do not have assistant principals or other administrative staff, as the middle/high school teacher-leaders do.

- **Secondary-Level Specialists** (1) provide educational testing of students referred to ORS, taking the PSAT/SAT, and needing updated testing for colleges; (2) administer the Transition Profile Inventory (TPI) for transition planning purposes; (3) complete the SPP indicator 14 transition outcomes-data survey; and (4) participate in case management activities. Because there are special education teacher-leaders at middle and high schools, the specialists do not participate in IEP meetings.

Middle/High School Special Education Teacher-Leaders

Teacher-leaders meet regularly with principals and other teacher-leaders to discuss areas of support for teachers and students. During common planning time, they meet with content-area teachers to develop lessons plans across the curriculum. The leaders also meet with special educators to review IEPs, discuss failure and attendance rates, and develop intervention plans for individual students. They are also available to coach teachers in their schools.

During the summer of 2011, professional development will be provided to team leaders on how to conduct effective evaluation team meetings and manifestation-determination/IEP meetings. By chairing these meetings beginning in September 2011, the special education supervisors will have more time to support and provide feedback to teachers working in general education settings, promoting increased use of this setting and providing support for self-contained classes.

Case Management by Psychologists, Social Workers, and Special Education Teachers

School psychologists and social workers serve as case managers for new referrals to special education evaluations and for reevaluations in their assigned schools. They schedule and coordinate evaluation reviews and eligibility meetings, complete needed assessments, document the evaluation process on required forms, and enter information on evaluation logs. Also, special educators act as case managers by scheduling annual IEP reviews and reevaluations with assistance from psychologists and special education specialists.

Staffing Patterns and Usage

Teaching and learning for students receiving special education services is affected by school-district staffing patterns and usage. The Urban Special Education Leadership Collaborative (Collaborative) is a network of special and general education leaders who work together to improve outcomes for students with disabilities in urban schools. The Collaborative collected data⁴⁵ in 2010 to provide a general understanding of urban school district staffing levels. The survey does not give precise comparisons and the results should be used with caution. District data are not uniform (e.g., including or excluding contractual

⁴⁵ The data are supplemented by information collected by the Council of Great City Schools.

personnel), and reflect varying levels of private and public placements outside a district. The data, which have been supplemented by information collected by the Council of the Great City Schools during special education reviews, are useful in better understanding staffing ratios.

Teachers and Teacher Assistants

As shown by exhibit 43 below, PPSD has an overall average of 13 students with disabilities for every special education teacher and teacher assistant. For special educators, the average is two students less than the average of 15 for all districts, ranking Providence as 17th among the 44 urban districts participating in the survey. For each teacher assistant, the average is three students less than the average of 16 for all districts, ranking Providence 14th among the 44 reporting districts.

Exhibit 43. Average Number of Students with Disabilities for Each Special Educator and Teacher Assistant⁴⁶

Areas of Comparison	Special Educators	Teacher Assistants
Number of PPSD Staff	340	339
PPSD Student w/IEP-to-Staff Ratios	13:1	13:1
All District Average Ratios	15:1	16:1
Range of All District Ratios	7–37:1	7–56:1
PPSD Ranking Among Districts⁴⁷	17th of 44 districts	14th of 44 districts

RIDE no longer has a provision that regulates maximum class-size ratios for students receiving special education services. The district considers each school’s staffing levels based on the number and needs of projected students. Disagreements, including those between special education administrators and principals, are resolved through the collection of additional information that involves the chief academic officer. The Council’s team received the following feedback on the process for hiring and use of special educators and teacher assistants.

- One major issue that received significant attention was the lack of criterion-based assignments for teachers or teacher assistants. As discussed above in the section on the Behavior Intervention Program, the procedure for filling vacant positions with teachers who do not currently have a teaching position causes significant problems in terms of getting teachers with the expertise and skills necessary to teach students with significant disabilities. Furthermore, if a teacher assistant position is open and filled without a bid, another assistant can “bump” into the position midyear. As a result, personnel change frequently. Many of these changes require retraining staff and

⁴⁶ 2010 Urban Special Education Leadership Collaborative staffing survey, supplemented by data from the Council of Great City Schools.

⁴⁷ Ranking begins with districts having a low average number of students to one staff person.

periods of adjustment for students who do not respond well to change. One case was reported where the assistant spoke a different language than did the assigned students.

- The team was told that the Teacher Assistants Union is currently grieving the special education office's contract with an agency providing skilled behavior technicians.
- There appears to be a culture of using teacher assistants for off-duty assignments that take them away from supporting instruction, such as bathroom duty, etc.
- Child care workers who are certified nursing assistants provide toileting assistance while teacher assistants provide instructional support to students.
- Although teacher assistants are paid to receive seven hours of the district's professional development, there was a universal concern that they require more training in order to be effective. The Council was told that classes are offered between December and May, and many are full. Focus group participants indicated that last year the training was more targeted for teacher assistants. There was concern that training was inconsistent in supporting students with autism, but interviewees claimed that when training was provided, teacher-assistant support improved.
- Teacher assistants are not allowed to be bus monitors, and monitors are not permitted to assist students needing physical restraint. In such cases, both a teacher assistant and a bus monitor must ride the bus. Reportedly, in some cases the teacher assistant must leave work early to ride a bus that serves two schools.

Related Service Providers

Staffing ratios and district data on the district's related-services personnel are summarized below and in exhibit 44:

- ***Speech/Language.*** One pathologist for an average 111 students, which is slightly above the average of 1:125, ranking Providence 25th of the 43 reporting districts.
- ***Psychologists.*** One psychologist for an average 159 students, which is also slightly above the average of 1:181, ranking Providence 25th of the 36 reporting districts.
- ***Social Workers.*** One social worker for an average 127 students, which is far greater than the average of 1:283, ranking Providence 14th of the 27 reporting districts.
- ***Occupational Therapists.*** One occupational therapist for an average 388 students, which is also greater than the average of 1:427, ranking Providence 9th of the 42 reporting districts. The union contract caps the caseload for occupational therapists as 33 students, which may explain the district's ratio in this area.

- **Physical Therapists.** One physical therapist for an average 991 students, which is substantially greater than the average of 1:1144, ranking Providence 20th of 42 reporting districts.

Exhibit 44. Ratios of Students with Disabilities to Staff for Related Service Providers

Related Service Areas	Speech/ Language	Psychology	Social Work	OT	PT
Number of PPSD Staff	35	28	35	11.5	4.5
PPSD Student w/IEP-to-Staff Ratio	111:1	159:1	127:1	388:1	991:1
All District Average Ratio	125:1	181:1	283:1	427:1	1144:1
Range of All District Ratios	26–341:1	31–337:1	26–673:1	64–1685:1	128–2941:1
PPSD Ranking Among Districts⁴⁸	25th of 43	25th of 36	14 th of 27	9th of 42	20th of 42

Two staff members in each of the following areas serve as leaders: psychologists, social workers, and speech therapists. The “leads” work with the directors to develop research-based professional development in each field and solve various problems. They also help create schedules, develop caseloads, and order supplies. These “leads” are directly supervised by the two special education directors.

The only area in which the Council’s team heard concerns about related services involved speech/language services. Although recruiting bilingual personnel is particularly difficult, there were still concerns about the shortage of speech/language pathologists for both English- and Spanish-speaking students. According to focus group participants, State complaints filed against PPSD mostly involve speech/language services resulting from these shortages. Rhode Island does not set maximum caseloads and they can be as high as 70 or 80 students.

Parental Support and Involvement

IDEA requires parental collaboration and inclusion in IEP planning for children receiving special education and related services. Indicator 8 of the SPP involves district results on a Parent Involvement Survey. With the survey, the state measures the percentage of parents with a child receiving special education service who report that schools supported their involvement in improving services for children with disabilities. The state’s target for the 2009-10 school year was a relatively low 38.9 percent. According to RIDE’s SPP report for the district, these data are only reported as a state aggregate score.

⁴⁸ Ranking begins with districts having a low average number of students to one staff person.

The district's mechanism for parent collaboration is the state-mandatory Providence Local Advisory Committee (LAC), which meets at least four times a year. About half the LAC is composed of parents and the other half includes teachers, school administrators, and related-service providers. The group is led by two parents and two special education administrators who plan meetings on a variety of subjects, including IEP planning and the continuum of services, federal and state special education requirements, and RTI/PBIS (with which parents expressed confusion). Social networking between parents and professionals is encouraged, and time is available at the end of each meeting for parents to seek resolution of their concerns. Sample concerns from parents included missing speech services and long-term absences of teacher assistants with no coverage.

The following feedback was provided about the LAC and the district's involvement with parents:

- Parents interviewed indicated that the district does a good job getting information out to parents. A positive reflection of the special education office's collaboration with parents is the absence of due process hearings and effective use of mediation to resolve concerns.
- Over the last three years the LAC's membership has increased, but focus group participants stated that it has been difficult to find parent leadership. Staff collaborate with the RI Parent Information Network (RIPEN) to provide an eight-week parent leadership program to address this issue.
- While the superintendent asked every principal to identify a parent who would represent the school at meetings and act as a liaison between the LAC and the parent/teacher organization, attendance is inconsistent. Attendance by the three district principals who are to represent the district and share information with grade-level peers is also spotty. Reportedly, teacher participation decreased when compensation for their attendance ceased.
- Some parents expressed the desire for greater school-parent communication and opportunities for parents to receive assistance and to learn about the special education process and about what special education means for a child's future. In addition, while parents who are ELL are given headphones during LAC meetings to hear information in Spanish, concerns were expressed that IEPs were not translated sufficiently into Spanish and language interpreters were not always available for IEP meetings.⁴⁹

⁴⁹ In a letter dated September 4, 2007, the federal Office of Special Education Programs (OSEP) indicated that districts are not required to translate IEPs into a parent's native language. However, OSEP indicated that, for parents who read in their native language, providing them with written translations of the IEP documents may be one way for a school district to demonstrate that the parent has been fully informed of the child's educational program.

- Although the district's website provides information about administrators that parents may contact about concerns, feedback from parents indicated that they are sometimes not clear about whom to approach, and when they do try to make contact, responsiveness varies despite a district a 24-hour return-call policy.

Professional Development

In addition to the features of the district's professional development discussed above, the following provides an overview of this area.

Special education and the teaching and learning unit collaborate on providing professional development opportunities for teachers to improve instruction. A minimum number of professional development hours (ranging from 20 to 80) are required, based on position title. Teachers and teacher assistants are paid to attend the training.

PPSD publishes a catalog of workshops for all teachers by category, which teachers select through My Learning Plan. However, focus group members shared the concern that classes fill up quickly, so some teachers are prevented from accessing required professional development.

The special education office also supports leadership training for district teaching and learning teams and principals twice monthly. In addition to general topics focused on the core curriculum, analyzing and understanding data, and creating school-based effective professional-learning communities, information is provided on special education and ELL regulations and on instructional strategies. Learning-walks and book readings also support these activities.

Moreover, specific workshops are provided to support special educators in literacy, math, and science instruction and in implementing grade-level standards and curriculum. Workshop topics include literacy, science, and math training, as well as other areas, e.g., analyzing student data, IEP development, alternate assessments, developing functional behavior assessments, implementing a three-tier approach to behavioral interventions, and understanding and meeting the needs of students with autism spectrum disorder.

Use of Technology and Data

The district's technology infrastructure is old and is cumbersome to operate. Examples include old computers that are slow to open Microsoft and other software files and emails, and insufficient access to printers and ink, etc. Although there are fiscal limitations and there has been poor planning, the district has a three-year technology plan (July 1, 2010 to June 30, 2013) to improve access to effective technology.

The district's electronic IEP process, EasyIEP, provides an effective way to produce IEPs, but data migration issues have prevented staff members from using the data, maintaining compliance reporting, and using other benefits of the program. For example:

- Special education office secretaries and evaluation team members input a variety of special education data into REG, the district's proprietary student information system, which should be able to migrate data electronically, but does not. This problem stems from initial difficulties in setting up the electronic IEP system several years ago and the inability to correct data migration issues. The input of data that are not migrated creates an environment for inaccurate data.
- It is time-consuming for PPSD to prepare essential data reports from REG, such as those requested by the Council's team. It is also difficult to provide school-based reports on state performance indicators. Furthermore, reports on eligibility rates for students referred in one school year cannot be accurately calculated because the REG system is unable to produce data for evaluations completed the following school year. This problem may also impact state assessment reporting for students who have exited from special education and/or ELL programs for at least two years.
- Although the district does receive various compliance documents that special education specialists and administrators review with school-based staff, the real-time compliance functions of Easy IEP (such as electronic notifications of upcoming evaluations, IEP meetings, etc.) are unavailable, but they would help improve the district's timeliness rates in these areas.
- Special education records are copied and maintained at the central office, resulting in unnecessary costs and personnel effort. Focus group participants indicated that when students transfer between schools, it could take three to four weeks to obtain records.

Focus group participants also raised concerns about delays in downloading assistive technology software required for students. District policy permits only instructional technology personnel to input software. This may take several weeks. Some special education personnel, however, believe they have the knowledge to accomplish this task more promptly. This issue may also be affecting the downloading of the district's electronic transition planning system.

Summary of Observations, Concerns, and Recommendations on Support for Teaching and Learning

The following are positive observations, areas of concerns, and recommendations to improve support for teaching and learning.

Special Education Management and Operations

Positive Observations

- ***Knowledgeable and Collaborative Staff.*** Special education directors and their staff are viewed as knowledgeable and helpful to schools and parents and as working cooperatively with other teaching and learning administrators.
- ***Well-staffed Administrative Support.*** Nine administrators (including two directors) and 11 “quasi-administrative” specialists support the district’s 45 regular and charter schools, a relatively small administrator to school ratio.
- ***Lead Related-Services Staff.*** The special education administrative unit uses a system of “lead” personnel in the areas of psychologists, social workers, and speech/language pathologists who serve as mentors and who assist directors in designing professional development and support their administrative functions.

Areas of Concern

- ***Administrators Are Not Organized for Maximum Effectiveness.*** Although the special education office enjoys a relatively small administrator to school ratio, the administrators are not organized in a highly effective manner.
- ***Director Positions.*** The two special education directors have similar functions at the elementary and secondary levels. This seeming division of responsibility, however, eliminates any economy of scale otherwise available. For example, both directors have responsibility for establishing procedures for maintaining compliance with federal and state special education rules. Furthermore, they each have districtwide responsibilities for some content areas but rely on supervisors and specialists over whom they have no supervisory authority. In addition, they each have responsibility for supporting individual schools.
- ***Supervisors and Specialists.*** In addition, some supervisors have responsibility for districtwide programmatic areas but lack the ability to oversee the execution of their programs. For example, a supervisor supports the Behavior Intervention Program but is assigned to some schools that do not have these programs and is not assigned to schools that do. Furthermore, the extent to which this supervisor is able to coordinate with the behavior coaches is affected by other responsibilities that require going through two directors. According to interviewees, despite the small overall administrative ratio, supervisors reportedly work reactively and in “crisis mode.”
- ***Lead Psychologists, Social Workers, and Speech/Language Pathologists.*** None of the lead personnel have any reduced caseloads to support their work.

- **Secretaries.** The special education department has a surprisingly large number of secretaries. The department recommended reductions in the past, but the union opposed them. In addition, changes to their roles have elicited grievances, e.g., filing student records, inputting SWIS discipline data, etc.
- **Human Resource Responsibilities.** Special education administrators conduct all screening interviews for teacher assistant positions. In other districts, this function is typically performed by Human Resources.

Recommendations

10. Reorganize the special education office in the following ways:⁵⁰

- a. Employ one director for special education and support services.*** Although focus group participants provided positive comments about the two special education directors, the district's size does not justify having two different leaders in this area. Instead, one voice in special education and support services will provide more consistency and accountability and will eliminate previously overlapping responsibilities. The director should have responsibility for the overall management and operation of special education, providing leadership to managers and collaborating with PPSD education-related administrators. *(1 administrative assistant)*
- b. Establish manager positions⁵¹ to assist the director in the administration and operation of the office.*** Instead of layering districtwide and grade-level programmatic responsibilities on top of direct support to schools, consider establishing the following manager positions:
 - *Programmatic manager* to provide leadership in the areas of behavior (including PBIS, behavior coaches, behavior intervention programs), physical restraint training, autism teams, and alternative assessments. *(1 administrative assistant for this and next three managers)*
 - *Clinical and other support manager* to provide support for all related-service personnel, assistive technology, vision/mobility, adapted physical education, scheduling, psychiatric evaluations, etc.
 - *Data support manager* to coordinate electronic IEP processes and develop on-demand data reports.

⁵⁰ It is anticipated that these changes would be budget neutral. Also, the recommendations are offered with recognition that they present details that would likely be modified, based on further review and consideration.

⁵¹ The term manager is used here generically and does not refer to a particular position level. Consequently, there may be more appropriate titles or classifications for these positions.

- *Business operations manager* to provide support on the budget, Medicaid billing, taxi vouchers, private school billing, etc.
- *Elementary-level manager* to (1) support teaching and learning's direction for RTI/PBIS and provide direction for inclusive educational services, (2) carry out program quality reviews, (3) coordinate extended school year and home instruction, (4) support preschool and child-find activities, (5) coordinate professional development activities for elementary schools, (6) liaise with the Local Advisory Committee, (7) support human resource activities, and (8) attend teaching and learning and grade-level meetings. (1 administrative assistant for manager and coordinators)
- *Secondary-level manager*. Same as above but support transition activities (instead of early childhood activities). The current transition coordinator would report to this manager. (1 administrative assistant for manager and coordinators)
- *Preschool manager* to provide support for preschoolers with disabilities, including curriculum development, teaching strategies, mandates from RIDE, child outreach screening, working with the pre-k community, transition to kindergarten, early interventions, and coordinating with the 24 pre-k classrooms and three pre-k teams.
- *Lead psychologists, social workers and speech/language pathologists*. Investigate the possibility of reducing the caseloads of the two leads in each area to support their effectiveness. (1 administrative assistant)

Include for one or more of these managers the responsibility for developing the procedures necessary for implementing federal and state compliance activities. As discussed in recommendation 11, transfer to Human Resources the responsibility for recruiting and screening teacher assistants.

- Redefine the specialist position as a coordinator (or other title) to directly support schools that are under the supervision of the elementary- or secondary-level manager.*** Coordinators would directly support schools and teachers in all areas for which the elementary- and secondary-level managers are responsible. In addition, the coordinators would support the work of other programmatic managers in their respective schools. Assign five coordinators to the elementary schools and four to the middle and high schools. The additional support at the elementary level would assist coordinators in being the district's representatives at IEP meetings until individuals in the elementary schools can be identified to carry out this function. In the meantime, provide sufficient training to elementary school related-service personnel and special educators to conduct these meetings pursuant to federal and state requirements.
- Provide sufficient professional development for personnel to enable them to carry out their responsibilities.***

Staffing Patterns and Usage

Positive Observations

- PPSD staffing ratios for special educators and teacher assistants is in the top half of urban school districts responding to the survey conducted by the Urban Special Education Leadership Collaborative and supplemented by the Council of Great City Schools. Further, ratios for speech/language pathologists, social workers, and physical therapists appear to be around the middle ranking of all reporting districts.
- The Teacher Assistants Union funds professional development for its staff and expressed a willingness to collaborate with the district in providing more access to this needed activity.

Areas of Concern

- The district employs as many teacher assistants as it does special educators. Teacher assistants are frequently asked to accept assignments that are not related to their job responsibilities supporting students with disabilities. Further, the lack of substitutes for teacher assistants affects instruction when they are absent, especially for long periods of time. When teacher assistants are needed to restrain a student on a bus, transportation schedules may require them to leave school early. The prohibition against using teacher assistants as bus monitors or training and enabling bus monitors to properly restrain students blocks effective use of resources.
- Due to the lack of criterion-based hiring for teachers and teacher assistants, more professional development and support are required than would otherwise be necessary. Furthermore, the impact of teacher assistant bumping midyear has an unnecessarily negative impact on students who need skilled and consistent support. In addition, the required differentiation of personnel between childcare workers and teacher assistants is neither programmatically nor fiscally effective.
- There is a significant need to expand professional development for teacher assistants so that they are more effective at supporting students. The short period of time for training unnecessarily limits access to such expanded development.
- The district ratio of student-to-occupational therapists appears to be in the top fifth of all reporting districts.⁵² However, although the ratio for speech/language pathologists appears to be about average for reporting districts, we are concerned that there are too few, including bilingual staff, as evidenced by the number of complaints filed with the state on this issue.

⁵² As noted previously, this ratio is a union contract issue that may need to be addressed.

- The Council’s team was also concerned about the lack of content-certified special educators; the lack of substitutes for teacher assistants who are absent (sometimes for months at a time); and ESL teachers not supporting an ELL student with disabilities in a class not designated as ESL.

Recommendations

11. Establish the following procedures and practices designed to enhance the expertise of personnel involved in the instruction of students with disabilities:

- a. With university collaboration and exemplary core-content teachers, aggressively provide professional development to special education teachers who do not have necessary core curriculum knowledge and skills.***
- b. Review the proportion of personnel hired as special education teachers and teacher assistants; review use of occupational therapists.*** With a representative group of principals, consider effective models for using more special educators and fewer teacher assistants in a budget neutral way. In addition, review the use of occupational therapists and whether the current ratios are necessary to meet the needs of students.
- c. Establish criteria-based hiring practices for special educators and teacher assistants.*** As soon as possible, implement criteria-based hiring for teachers and teacher assistants. As part of this process, determine if there is any way to address the seniority-based filling of positions without having to hire previously employed teachers who are now without jobs. Also, take steps to end the practice of midyear job shifting, given the negative effect this practice has on students, particularly those with significant disabilities. In particular, establish hiring criteria for teachers and teacher assistants working with students who have intensive needs (e.g., autism, social/emotional, communication, hearing, vision, etc.).
- d. Ensure the appropriate and effective use of teacher assistants.*** Issue a reminder to principals that teacher assistants should not be asked to leave instructional duties to perform clerical or other nonrelated instructional activities, and investigate any noncompliance the practice might involve.
- e. Aggressively explore the use of substitutes for absent teacher assistants.*** The use of substitutes would require discussion with the union because the current requirement indicates that once teacher assistants work 60 days they become a long-term substitute, which entitles them to benefits.
- f. Expect the Human Resources office to engage in expanded recruitment, screening, and hiring in the area of special education and related services.*** Set expectations for Human Resources to expand advertising for and recruitment of teacher assistants so that there is a large enough applicant pool to fill all positions at the beginning of the year. Interview and screen individuals applying to become teacher assistants, and

increase support for recruiting and hiring special education teachers certified in core content areas and bilingual staff members with expertise in challenging behavior, speech/language pathology, and multiple languages.

g. Explore the use of “virtual” speech/language therapy when the need exceeds capacity.

h. Pursue more flexible work rules, including:

- Job descriptions that enable teacher assistants to fulfill various childcare worker duties that do not require specific educational requirements, e.g., changing diapers, and that enable child care workers to provide incidental supplementary instructional support to students.
- More flexible job descriptions that support changing needs, e.g., asking secretaries to input SWIS behavior data on-line; expecting an ESL teacher’s duties to include supporting an ELL student in a class that is not designated as ESL, etc.
- Enabling teacher assistants to serve as bus monitors and/or enabling bus monitors to be trained to appropriately restrain a student.

i. Increase professional development opportunities for teacher assistants. Collaborate with the union to provide more training for teacher assistants, including comprehensive initial training before the school year and again midyear for new hires as needed and for assistants involved with students having significant needs. Training should include strategies for supporting co-teaching and core PBIS principles and strategies.

Parental Support and Involvement

Positive Observations

- It appears the district provides good information to parents. There is an absence of due process hearings and use of mediation to resolve concerns. A strong relationship with the RI Parent Information Network provides a means of increasing parent LAC leadership.
- The district supports an active LAC, with leadership that takes its role seriously. The LAC is striving to expand parental involvement and knowledge about activities that would benefit their child’s performance. Real-time translation of meetings into Spanish provides meaningful access for parents who are ELL.
- The special education department has a robust website with information about the special education process, as well as separate pages on child outreach, early childhood special education, individualized education plans, dispute resolution, disproportionality, related services, helpful links, and special education contacts.

Areas of Concern

- There is inconsistent attendance at LAC meetings by designated grade-level principal representatives and parents acting as school liaisons. Teacher participation has also decreased because they are no longer compensated for attending.
- The team had a number of concerns about the need for expanded opportunities for parent/school/district communications, school contact information to resolve problems, inconsistent administrator or school-based responsiveness, consideration of IEPs translated into Spanish, and language interpreters for IEP meetings.

Recommendations

12. Reinforce PPSD's efforts to promote effective parent involvement in the education of their children with disabilities by considering the following:

- a. To support consistent grade-level attendance at LAC meetings by principals and special educators, rotate volunteer principal/teacher involvement, with the understanding that the responsible individual will arrange for a substitute if unable to attend a meeting.*** As part of this process, the superintendent and chief academic officer would stress the importance of this activity and why their participation and sharing of information is beneficial to parents and their children.
- b. Share with the LAC leadership the feedback that sessions might be best grouped or organized around relevant grade levels.*** While the meetings might continue to address parents at all grade levels, it may be appropriate to divide some presentations and discussions into specific preschool, elementary, middle, and high school categories to make them more relevant and attractive to parents and stakeholders.
- c. Consider the benefits of possibly translating IEPs into Spanish and providing Spanish language translators for IEP meetings upon request.*** Establish procedures for notifying appropriate staff about meeting these requests.
- d. Establish a LAC subgroup to discuss ways to improve communication between parents and schools, including sharing information about special education requirements, identification of school-based contacts, etc.*** Consider one-page parent information sheets that would be available in schools and other convenient locations, such as the ones recently developed by the Detroit Public Schools. See appendix D for an example.
- e. Investigate whether it is possible to obtain from RIDE the district's non-reported percentage of parents with a child receiving special education services who were asked about their involvement in the IEPs.***

Professional Development

Positive Observations

- The special education and teaching and learning offices collaborate to provide professional development opportunities for teachers to improve instruction. Teachers are paid to attend a minimum number of hours of professional development, which range from 20 to 80 hours depending on job title. Also, the special education office supports leadership training twice each month for the district's teaching and learning teams and principals. Training is supplemented by learning-walks and shared book reading.
- Workshops designed for special educators and teacher assistants cover a variety of topics relevant to the instruction of students with disabilities.

Areas of Concern

- Focus group participants indicated that professional development classes fill up quickly. As a result, staff members do not have sufficient opportunity to access required professional development.
- Although significant professional development has been offered, concerns remain about performance in the following areas: (1) consistency in making special education eligibility determinations, (2) differentiating academic difficulties due to a language acquisition problem or to a disability, (3) knowledge of core-curriculum content, (4) effective RTI/PBIS practices, (5) differentiated instruction, (6) effective support of students with disabilities (including ELLs) in general education and separate settings, and (7) reducing challenging student behavior.

Recommendations

- 13. Based on the recommendations on professional development included in this report, have the PPSD leadership team consider how professional development could be better organized and mandated to accomplish desired goals.*** As part of this process, consider the district's capacity and need for training using electronic means (such as webinars, videos and assessments), as well as coaching and mentoring to ensure that all staff have access to quality professional development, internalize information, and use what they learn. Especially important is identifying ways that special educators can learn core content information in a practical and user-friendly manner.

Use of Technology and Data

Positive Observations

- Special education and technology representatives from the district have met with the data vendor to initiate the migration of data from EasyIEP to REG and fully realize the compliance reporting capabilities of the district's electronic IEP system.
- Planning is underway to enhance the district's technology system.

Areas of Concern

- The district's old technology system is difficult to navigate and to use productively.
- PPSD's electronic IEP system is not being fully utilized:
 - There are difficulties migrating data from Easy IEP to REG. As a result, there is double entry of data, which leads to human entry errors and cost inefficiencies.
 - Because EasyIEP data reporting has not been fully utilized, it is extremely difficult and time consuming for PPSD to prepare special reports, as well as timely, essential, and accurate routine reports, e.g., percentage of referred students who are eligible for special education services, accurate dropout and graduation rates, and accurate transition compliance rates.⁵³
 - Various compliance functions of Easy IEP (such as notification of upcoming evaluations, IEP meetings, etc.) have not been fully utilized. (This issue may also affect state assessment reporting of students who have exited from special education and/or ELL programs for at least two years.)
- Maintaining special education records at the central office results in unnecessary costs and personnel effort.
- The office of technology's control over the downloading of all software results in delays in providing students access to assistive and other technology.

Recommendations

14. Improve the way PPSD uses technology to support staff and students receiving special education services.

- a. Improve electronic IEP reporting.*** Follow up on the district's discussions with its vendor about implementing plans for migrating data between Easy IEP and REG and

⁵³ See discussion in section B regarding RIDE and district graduation and dropout rates and section C regarding transition compliance rate reporting discrepancies.

fully utilizing the electronic IEP system, including useful data edits, compliance notices, and routine and advance reporting. Discontinue the use of manual special education data entry into REG. Making these changes should also improve the district's ability to monitor IEP-service documentation, and this should have a positive impact on Medicaid billing.

- b. Authorize approved special education personnel to download software* for assistive technology, electronic transition planning process, etc.
- c. Ensure that reported data are accurate.* Investigate the basis of inconsistent data reported by PPSD and RIDE in areas highlighted in this report: graduation and dropout rates and compliant-transition data. If possible, identify ways to correct inconsistent reporting in the future.
- d. Stop the practice of centralizing special education student records at the special education office.* Aggressively develop procedures for the confidential maintenance of student special education records at the student's school and for transferring these records between schools upon student transfer. The process should align with the process used for maintaining all student records in schools. Carry out this transfer of the special education records back to the schools as quickly as possible, along with accountability measures for their maintenance. The district should note that this action would require union discussion of secretarial contractual issues.

Section E. Accountability for Expected Practices and Results

Finally, the Council's team reviewed the systems that PPSD has in place (1) to hold central office and school-based personnel accountable for the administration and operation of special education services, and (2) to implement practices designed to improve the performance of underachieving students through RTI and PBIS. The following summarizes the team's observations and recommendations on this issue.

- In the 2010-11 school year, PPSD implemented a Principal Performance Metric, which measures a variety of student-performance indicators for all students and achievement gap data in reading and math between various subgroups, including students with and without IEPs. The Metric also sets targets to reduce the gaps through 2014-15. It was reported to the team that, as a result of this action, principals were more carefully analyzing data for students receiving special education services and were discussing instructional supports, such as curricular accommodations and inclusive instruction. The Metric, however, does not address other performance indicators relevant to students with IEPs, such as those included in the state performance indicators. For example, the Metric could not be used to address RIDE's determination that the district *needs assistance* on timely evaluations of school-aged students and children transitioning from Part C early intervention programs by three years of age.
- The district has a culture in which principals and other personnel rely heavily on special education directors, supervisors, and specialists to administer school-based activities. Principals are not required to account for a variety of special education processes conducted at their schools, such as completing evaluations promptly and appropriately. Instead, principals view this as a supervisor's duty. The district has begun to move responsibilities to the school level by shifting various functions from supervisors to teacher leaders at the middle and secondary levels.
- Although school walk-throughs address RTI interventions, they do not address effective co-teaching and other research-based models for educating students with disabilities, including those who are ELL.
- The district's current system for conducting teacher evaluation will be replaced by a system that will be phased in over the next three years. The system must meet state standards requiring 51 percent of the assessment to be based student achievement data.

In 2006, PPSD commissioned a report from the Public Consulting Group's Center for Resource Management (CRM) to examine the district's provision of special education instruction and support. According to the RIDE Office of Special Population's January 2007 *School Support System Report and Support Plan for the Providence School Department*, many of CRM's findings were echoed in the state report. Similarly, many of CRM's findings are reflected in this report.

The CRM Report had two stated goals: to provide a comprehensive analysis of the outcomes by students with disabilities and to determine the extent to which these students are developing the reading skills necessary for academic success. The report emphasized the district's need to:

- *[C]reate an accountability structure for program effectiveness and student outcomes with clear lines of authority and responsibility*
- Develop a unified system that collaboratively addresses the needs of all students in order to provide effective instructional supports and to maximize the use of staff and resources.

CRM recommendations included the following strategies for promoting improvement:

- Facilitate RTI, and emphasize that the initial leadership role taken on by special education needs in fact to be a general education initiative with collaborative input from special education.
- Address consistency issues in the provision of services across schools.
- Establishing a research-based co-teaching model.
- Co-train general and special education teachers in the use of accommodations, modifications, and behavior interventions;
- Continue to emphasize professional development related to differentiating instruction.
- Provide research-based behavior programs/interventions at the middle and high school levels.
- Improve transition services at the high school level.
- Define the roles of supervisors and principals, including redefining/clarifying the special education supervisor's role to support school staff to be more integrated with school level efforts. Also, clarify the principal's role in supervising instruction and improving outcomes.

The RIDE report noted several aspects of these recommendations that were apparent during their review, such as the use of PBIS, professional development on differentiated instruction, and integrated professional development for general and special educators. In addition, the district has begun to implement RTI, including the use of universal screening, research-based interventions, and progress monitoring.

Also, the offices of special education, in partnership with research, planning, and accountability, developed an internal *Special Education Report* for the Providence School Board in October 2009. The task of the report was to answer three questions:

- What special education services are available to Providence students?
- What students are receiving special education services?
- To what extent are special education services aligned and in compliance with regulations, policies, and procedures articulated by the federal and state government?

The report was very thorough and contained a significant amount of data and analysis, although it lacked a detailed discussion of issues and an action plan.

Summary of Positive Observations, Concerns, and Recommendations on Accountability for Expected Practices and Results

The following are positive observations, areas of concerns, and recommendations for improved accountability for expected practices and results.

Positive Observations

- PPSD's recently implemented Principal Performance Metrics include academic gaps between students with and without IEPs, thus focusing on the performance of students receiving special education and on instructional elements that supports their success.
- Several recommendations made in 2006 from an outside special education evaluation have begun to be implemented, and the district's offices of special education and research, planning, and accountability reflected a sophisticated understanding of the district's operation and relevant data pertaining to instruction.

Areas of Concern

- Although PPSD has begun to step up accountability at the school level for the performance of students with disabilities, the 2006 CRM recommendation for the creation of an accountability structure for program effectiveness and student outcomes with clear lines of authority and responsibility has not been fully addressed.
- The district does not have clear expectations for principals' responsibility for the administration and operation of special education, including core practice areas that support student academic and social/emotional performance.
- Systemwide planning lacks core research-based practices that support inclusive education with supplementary aids and services, positive behavior for students with challenging behavior, state performance indicators, and targets and measurement components. In addition, walk-through protocols lack indicators to guide staff to identify and provide feedback on such research-based practices as effective co-

teaching and other instructional models. And the professional development system is not differentiated and based on an analysis of what individual teachers need to become more effective or on districtwide special education goals and priorities.

Recommendations

- 15. *Enhance PPSD’s system of accountability by incorporating core measurable expectations, including those for RTI/PBIS, inclusive instruction, outcome indicators required by the SPP, etc.*** Establish, communicate, support, and monitor clear expectations and “non-negotiables,” establishing clear lines of accountability and responsibility across departments, aligning them with relevant guidance documents. Require schools to incorporate effective activities into their school improvement plans (e.g., walk-throughs and professional development), and incorporate them into administrator, principal, teacher, teacher assistant, and related-service personnel evaluations. Establish school-based targets for meeting these expectations that would enable the district to meet or exceed all state performance targets. Expect executive directors to review, monitor, and support activities to meet targets, with collaborative support from the special education office.
- 16. *Communicate clear expectations for principal accountability for the administration and operation of special education at the school level.*** Establish clear oral and written communications to principals and their executive directors on principal accountability for special education operations and administration. To support this process, provide principals with the professional development and supports they need (1) to provide leadership for educating students with disabilities in general education classes with needed supplementary aids and services, (2) to ensure that students in separate classes have access to the core curriculum and positive behavior supports, (3) and to set up systems for appropriate eligibility determinations, IEPs and services, manifestation-determinations, etc. To this end, provide sufficient training to new executive directors and principals before or soon after they begin their tenure.
- 17. *Establish a process whereby the core measurable outcomes referred to in recommendation 15 are actively reviewed and acted upon.*** Following the oft-quoted saying that *what gets measured gets done*, regularly gather relevant stakeholders to review data and identify actions that need to be taken when the reviews indicate necessary follow-up action. Stakeholders would include relevant executive directors and principals, special/general education, and other relevant administrators. Such meetings should rotate reviews on the such data elements for students with and without IEPs as (1) graduation rates (at beginning of year) (2) dropout rates (periodically when data are available); (3) credits earned, failures, and “D” grades; (4) unexcused absences; (5) suspensions (in-school and out-of-school by race/ethnicity) and office referrals; (6) use of PBIS and RTI; (7) referrals for special education evaluations and percentage of students found eligible by disability area; and (8) SPP performance indicators. The Baltimore City Public Schools has been using this process successfully and, as a result, principal

accountability in this area has become a reality. A copy of relevant information has been forwarded to district personnel for appropriate follow-up.

CHAPTER 4. SUMMARY OF RECOMMENDATIONS

A. Recommendation Matrix

The exhibit below annotates the recommendations from the previous chapter in table form corresponding with their functional categories. The subsequent section of this chapter presents a summary of the recommendations.

Recommendations	Accountability	Standards/Policy	School Plans	Training	Data/Technology	Cross-Reference
Section A. Identification of Students Eligible to Receive Special Education Services						
1. Improve consistency and appropriateness of eligibility determinations across the district.		x	x	x	x	4
a. Identify disability areas in which PPSD students are identified at higher levels than other students in nation. Consider consultant to review current criteria. Review sample of recent evaluations to identify concerns.		x		x		
b. Improve special education referral and screening process. Review <u>accurate</u> data to identify any patterns, and review student files reflecting trends.		x		x		
c. Use data to initiate improvement plans for referral/evaluation process and monitor outcomes; produce <u>accurate</u> quarterly referral reports and identify outliers. With principal, develop plans, and through CAO, disseminate data to relevant administrators to support school activities.	x	x	x	x	x	17
d. Improve special education referral/evaluation process for students who are ELL with evidence-based practices.		x		x		
e. Revise process for use of psychiatric evaluation, with written protocol, training, and monitoring of implementation.	x	x		x		
Section B. Student Performance						
2. Increase number of freshman year students “on track” to graduate.	x	x	x	x	x	17
a. Identify students “not on track,” i.e., students entering high school two or more years below grade level. Use research-based strategies to plan improvement, provide students with disabilities support for credit recovery assistance, and provide them access to high school courses based on core standards.		x	x	x	x	
b. Identify and support high schools with high dropout rates, require school-based targeted/research-based plans, and involve feeder schools.	x	x	x	x	x	17
3. Reduce out-of-school suspensions for students with disabilities. Identify students with disabilities (and nondisabled) having five or more days of out-of-school or in-school suspensions. Use model template based on RTI/PBIS for school-based planning plan and monthly report/disseminate data for follow-up.	x		x	x		17

Recommendations	Accountability	Standards/Policy	School Plans	Training	Data/Technology	Cross-Reference
4. <i>Create and distribute a monthly report on unexcused student absences by school, requiring schools to correct any data that appear to be reported in error. Have schools and the central office investigate/ correct erroneous data and follow up on excessive absences</i>	x	x			x	17
Section C. Instructional Practices and Support						
<i>Response to Intervention</i>						
5. <i>Develop and implement comprehensive RTI framework, policies, and procedures to address reading, math, positive student behavior, and accountability for results.</i>						
a. Establish general education leadership with expert support for RTI and PBIS.	x					
b. Establish RTI/PBIS framework, policies, and procedures to promote a common language for the implementation.		x	x			6f
c. Provide differentiated professional development to impart knowledge necessary to implement PPSD’s framework and standards.				x		
d. Identify the core information that various staff persons need regarding RTI/PBIS in order to develop/implement comprehensive and differentiated professional development.		x		x		
e. Collect, analyze, report, and follow up on student behavior-related data.					x	
f. Identify demonstration schools and exemplary staff to lead training.				x		
g. Monitor implementation and effectiveness.	x			x		17
<i>Instruction in General Education Classes with Supplementary Aids and Services</i>						
6. <i>Establish a bold vision of PPSD as an inclusive school district that provides students with disabilities with the supplementary aids and services they need to meet Rhode Island’s Common Core Standards.</i>						
a. Establish a visible general education presence with broad collaboration to lead initiative.	x					
b. Design and implement the infrastructure needed to execute PPSD’s inclusive school vision and policy, including research-based standards.	x	x				
c. Expand instruction in general education setting 40-79 percent of the time for students currently in more restrictive settings; incorporate components in recommendation 6 planning.				x	x	
d. Build on RTI/PBIS differentiated professional development for RTI to impart knowledge necessary to implement PPSD’s framework/standards for inclusive instruction, emphasizing core information that various personnel need to know.				x		
e. Establish a timely communication and feedback process to share solutions to barriers to carrying out programs.				x		
f. With model template, use school-based process for planning implementation of the framework.			x			5b

Recommendations	Accountability	Standards/Policy	School Plans	Training	Data/Technology	Cross-Reference
g. Collect and analyze data by school for students newly placed in general educational settings by the various categories monitored by the state. Establish school-based targets with follow-up using technical assistance/support.	x				x	17
h. Document how PPSD will accomplish the above.	x					
<i>Self-Contained and Private Settings</i>						
7. Reduce reliance on educating students with disabilities in self-contained and separate school settings; improve performance of students remaining in these settings.						
a. Collect and analyze data about students currently educated in self-contained and separate school settings.					x	
b. Identify characteristics of students to plan for less restrictive settings.					x	
c. Identify characteristics of students who could potentially attend their local area school/school of choice, supports needed, barriers anticipated. Individualize consideration through IEP process.				x	x	
d. Use a consultant for advice about educating more students with autism within general education classes, gathering relevant data for consideration.					x	
e. For students with significant behavior challenges, implement improved social/emotional supports at each school and address personnel issues impacting the Behavior Intervention Program.				x	x	13
f. Eliminate “fundamental” courses.			x			13
<i>Instruction for English Language Learners with Disabilities</i>						
8. Identify and provide more flexible models to support the education of ELLs with disabilities. Establish relevant board policy; include this policy in RTI and in key information for inclusive education guidance. Integrate activities into school plans; implement professional development. Make any data changes necessary in REG to support different service models for ELL students. Consider how non ESL-certified special/general educators and paraprofessionals can learn effective strategies.						
	x	x	x	x	x	5 & 6
<i>Support for Postsecondary Transitional Activities and Services</i>						
9. Develop a districtwide, comprehensive, and coordinated vision for transition services; plan to implement this vision using the National Secondary Transition Technical Assistance Center’s 16 evidence-based predictors of post-school employment and independent living success.						
a. Ensure Birch Vocational Center operates consistently with research-based practices.	x	x	x	x	x	
b. Expand community-based supportive work and employment.	x	x	x	x	x	
c. Research the need and possibilities for expanding the Transition Academy.			x		x	
d. Ensure the electronic transition system is fully implemented.		x			x	
Section D. Support for Teaching and Learning						
<i>Special Education Management and Operations</i>						

Recommendations	Accountability	Standards/Policy	School Plans	Training	Data/Technology	Cross-Reference
10. Reorganize special education office in light of recommendations specified in the report.	x			x		11f
<i>Staffing Patterns and Usage</i>						
11. Establish the following procedures and practices designed to enhance the expertise of personnel involved in the instruction of students with disabilities:						
a. With university collaboration and exemplary core content teachers, aggressively provide professional development to special educators who do not have necessary core curriculum knowledge and skills.				x		
b. Review the proportion of personnel hired as special education teachers and teacher assistants; review use of occupational therapists.		x			x	
c. Establish criteria-based hiring practices for special educators and teacher assistants; to extent possible, end practice of midyear job shifting.		x				
d. Ensure the appropriate and effective use of teacher assistants.	x	x				
e. Aggressively explore the use of substitutes for absent teacher assistants.		x				
f. Expect Human Resources to engage in expanded recruitment, screening and hiring in the area of special education and related services.	x	x				
g. Explore use of “virtual” speech/language therapy when need exceeds capacity.		x				
h. Pursue more flexible work rules, including (1) collapsing childcare worker and teacher assistant duties, (2) job descriptions that take into account changing needs and (3) training bus monitors to use physical restraint.		x				
i. Increase professional development opportunities for teacher assistants.				x		
<i>Parent Support and Involvement</i>						
12. Reinforce PPSD’s actions to promote effective parental involvement with the education of their children with disabilities by considering the following						
a. To support consistent attendance of grade-level principals and special educators at LAC meetings, rotate volunteer principal/teacher involvement, with an understanding that the responsible individual will arrange for a substitute if unable to attend a meeting.		x				
b. Share with the LAC leadership parental feedback that session groupings relevant to grade levels would be useful.						
c. Address ways to translate IEPs into Spanish and provide Spanish language translators for IEP meetings upon request		x				
d. Recommend creation of an LAC subgroup to discuss possible ways to improve parent/school communication, including sharing information about special education requirements, identification of school-based contacts, etc.; and consider one-page parent information sheets on different topics.						
e. Investigate if it is possible to obtain from RIDE the district’s nonreported Indicator 8 (parent satisfaction). If so, set in-district targets for improved performance.				x		17

Recommendations	Accountability	Standards/Policy	School Plans	Training	Data/Technology	Cross-Reference
<i>Professional Development</i>						
13. <i>Based on recommendations related to professional development in this report and matrix, PPSD leadership team should consider how professional development can be organized effectively and mandated to accomplish desired goals.</i>	x	x		x		
<i>Use of Technology and Data</i>						
14. Improve how PPSD can utilize technology to support staff and students receiving special education services.						
a. Improve electronic IEP and reporting.					x	
b. Authorize approved special education personnel to download software for assistive technology, electronic transition planning process, etc.		x			x	
c. Ensure reported data are accurate. Investigate basis of inconsistent data reported by PPSD and RIDE: graduation and dropout rates and compliant transition data.					x	
d. Stop centralizing special education student records and develop plan for returning files to schools, with accountability standards for their maintenance.	x					
<i>E. Accountability for Expected Practices and Results</i>						
15. <i>Enhance PPSD's system of accountability by incorporating core measurable expectations referenced in these recommendations, including RTI/PBIS, inclusive instruction, SPP outcome indicators, etc.</i> Require schools to incorporate relevant activities in their school improvement plans and activities	x				x	17
16. <i>Communicate clear expectations for and supports that enable principals to be accountable for the administration and operation of special education at the school level;</i> provide professional development and support for effective leadership.	x			x	x	
17. <i>Establish a process whereby the core measurable outcomes referred to in recommendation 15 are actively reviewed and acted upon.</i> Regularly gather relevant stakeholders to review data and identify actions that need to be taken when the review indicates that actions are needed.	x				x	

B. Summary of Recommendations

The following is a summary of the recommendations prepared by the Strategic Support Team of the Council of the Great City Schools for the Providence Public School District.

Section A. Identification of Students Eligible to Receive Special Education Services

Recommendations

1. *Improve consistency and appropriateness of eligibility determinations across the district and ensure staff members are held accountable for doing so.*

- a. *Identify all disability areas in which it is much more likely (e.g., one standard deviation) that a PPSD student will be found to have a disability than other students in the nation.*** Consider working with the National Association of School Psychologists or another credible group or consultant (1) to review the district's current criteria for all disability areas and (2) to ensure that they are sufficiently specific, measurable, and operational to advise local assessment teams. As part of this process, review a sample of recent evaluations that produced special education eligibility determinations in these areas to (1) identify areas of concern that should be reflected in the criteria, (2) provide professional development on any revised eligibility standards, and (3) promote appropriate decision-making. (See Section C on RTI for additional recommendations in this area.)
- b. *Improve the special education referral and screening process.*** Review *accurate* data to identify any patterns in the referrals that (1) were determined not to be appropriate for an evaluation and that (2) resulted in evaluations that did not produce an eligibility determination. Review a variety of student files in both categories reflecting these trends to identify any part of the referral and screening process that would benefit from revision. Based on this review and any subsequent procedural revisions, provide training to principals and relevant staff.
- c. *Use data to initiate improvement plans for the referral and evaluation process and monitor outcomes.*** Produce *accurate* quarterly reports showing the number and percentage of students (1) referred for a special education evaluation, (2) screened to proceed to an evaluation, and (3) determined to be eligible for services, also with the disability area. Disaggregate the data by school, race/ethnicity, and ELL. For any school (with a sufficient number of students) where (1) fewer than 85 percent of students who were evaluated were found eligible for services and/or (2) the disability area rate is above a level of expectation established by the district, review the evaluation data with the relevant school staff to determine how the school's referral, screening, and evaluation process could be improved. Based on this determination, involve the principal in setting expectations for future actions and monitoring their

outcome. Disseminate data through the chief academic officer to relevant PPSD administrators with responsibility for supporting school instruction and discuss how various departments can reinforce and support the actions to be taken by the schools.

- d. Improve the evaluation process for students who are ELL.* With relevant stakeholders, including the ELL director, research evidence-based practices for identifying and evaluating students who are ELL with suspected special education/related services needs to ensure that language acquisition issues are not mistaken for a special education need or mask such a need. As part of this process, consider the expertise that is available in schools and how it can be accessed to support this process. Also, consider how schools lacking such expertise can be assisted to support any ELL requiring additional support. Based on this information, initiate professional development activities to disseminate relevant information.
- e. Revise process for use of psychiatric evaluations.* Establish a written protocol regarding standards that may be applied on a case-by-case basis for recommending a psychiatric evaluation to determine if a student has or continues to have an emotional disturbance or autism. The protocol should be specific enough so that it produces a change from current practice of utilizing a psychiatrist for every evaluation. Following dissemination and training on the protocol, monitor its application for usage.

Section B. Student Performance

- 2. Increase the number of freshman-year students who are “on track” to graduate.**
 - a. Identify students “not on track.”* Initiate a strategy to identify and support all freshman-year students who are “not on track” to graduate, defining “not on track” as students entering high school two or more years below grade level.
 - b. Identify and support high schools with high dropout rates.* Identify high schools with dropout rates above the state’s dropout targets and require principals to collaborate with stakeholder groups to develop targeted plans, based on research-based approaches available through the National Dropout Prevention Center for Students with Disabilities. In addition, identify feeder schools and involve principals and staff of these schools to address identified issues proactively.
- 3. Reduce out-of-school suspensions for students with disabilities.** Review data from 2009-10 and 2010-11 showing students with disabilities with five days or more of out-of-school or in-school suspensions. Based on this information, join with stakeholders to develop templates for plans (elementary, middle and high school) with research-based interventions grounded in RTI/PBIS principles. Disseminate the data and templates to relevant district administrators and principals, and require principals to integrate the results into their overall school planning process. Report and disseminate the suspension data every month to determine the extent to which school activities are having a positive effect

and follow-up as appropriate. Note that this activity would be relevant also for students without disabilities.

4. **Generate and distribute monthly reports on unexcused student absences** by school for all students, including those with disabilities, requiring schools to correct any data that appear to be in error. Establish criteria for excessive absences (excused and unexcused) that would require school-based staff to investigate the basis of the absence and provide interventions, such as mentoring and community-based social service support.

Section C. Instructional Practices and Support

Response to Intervention

5. **Develop and implement a comprehensive RTI framework that addresses at a minimum reading, math, and positive student behavior, along with accountability for results.**
 - a. ***Establish general education leadership with expert support.*** To reinforce the notion that the RTI process is based in general education practices (but could also be accessed by students receiving special education and ELL support), establish a team of stakeholders that is led by the chief academic officer. Similarly, expand the district's PBIS leadership team to include a diverse group of stakeholders, including the three executive directors, principals, teachers, behavior coaches, etc., to discuss the various tiers of PBIS, including addressing the social/emotional learning needs of students. Ensure that the stakeholder and leadership groups meet periodically to ensure that the processes are aligned and coordinated and that PBIS is seen as a function of the RTI process.
 - b. ***Establish RTI/PBIS framework, policies, and procedures.*** To promote a common language for implementing RTI and for professional development to support RTI, develop a written framework, policies and procedures for both academics and positive behavior.
 - c. ***Identify the core information that various staff persons need about RTI/PBIS, and develop a comprehensive and differentiated professional development program.*** Use multiple formats, cross-functional teams to support schools, and walk-through protocols based on established standards to provide technical assistance, professional development, coaching, and mentoring as necessary to improve practices.
 - d. ***Collect, analyze, report, and follow-up on student behavior-related data.*** Determine how School-Wide Information System (SWIS) and any other data systems can be modified to ensure access systemwide and are capable of yielding user-friendly reports to relevant staff to facilitate analysis and follow-up action.
 - e. ***Identify demonstration schools and exemplary staff.*** Identify schools that have implemented various aspects of the RTI framework for other schools to visit. Identify

staff members who reflect these standards and who could provide training to their peers;

- f. Monitor implementation and effectiveness.* Modify walk through protocols and checklists to reflect the core practices and monitor the extent to which school practices conform to the guidance. For PBIS, incorporate Special Education Technology (SET) standards and supplement them for RTI's academic practices.

Instruction in General Education Classes with Supplementary Aids and Services

6. Establish a bold vision of PPSD as an inclusive school district that provides students with disabilities with the supplementary aids and services they need to meet Rhode Island's Common Core Standards. Establish and implement a written vision, school board policy, and framework to support PPSD's transformation to a model district that actively works toward providing a growing number of students with disabilities consistent and beneficial access to instruction in general education classes for the majority of the day with appropriate supports. Steps include the following:

- a. Establish a visible and collaborative general education presence to lead the implementation of a new board policy and initiative.* Given the clear and convincing evidence of the benefits of educating students with disabilities in the general education setting, it is important that efforts to increase the percentage of students educated in this setting become a systemwide priority and that the superintendent and chief academic officer provide leadership behalf of this priority, with meaningful support from special education and ELL.
- b. Incorporate the academic and behavioral progress of students with disabilities and the implementation of effective programs on their behalf into evaluations of principals and senior instructional staff in the central office.*
- c. Design and implement the infrastructure needed to execute PPSD's inclusive school vision and policy; establish school-based plans for implementation.* Based on the issues summarized in this report and others known to stakeholders, develop measurable research-based standards in specified areas.
- d. Expand instruction in general education between 40 and 79 percent of the time for students currently in more restrictive settings.* Analyze the district's low number of students receiving instruction in general education between 40 and 79 percent of the time, and determine how scheduling and staff support may have to change in order to educate more students in this less restrictive setting who are currently in self-contained classes. Based on this analysis, incorporate planning into the other components of recommendation 6.
- e. Build on the differentiated professional development for RTI/PBIS to impart the knowledge necessary to implement PPSD's framework and standards for inclusive*

instruction. To support the district’s framework and process, identify core information that various staff persons need and use specified strategies.

- f. Establish a timely communication and feedback process to share resolutions to implementation barriers.** Several areas are likely to require a targeted group of knowledgeable people to resolve implementation issues as they arise.

Use a school-based process for planning the framework’s implementation. Provide a template that includes the core components necessary to support successful inclusive practices: school-based planning, professional development, data gathering and review, and support for implementation of the plan. Integrate the plan with the school-based RTI planning described earlier and with school improvement plans.

- g. Initiate school-based targets, monitoring and support.** Collect and analyze data by school on students newly placed in general educational settings by the various categories monitored by the state. Establish targets for each school that would enable the district as a whole to meet or exceed state performance targets, and distribute reports showing school performance against these targets to district and school-based administrators. Base personnel evaluations, in part, on progress on these targets.

- h. Identify schools with general education classes having more than 30-40 percent students with disabilities and analyze causes for the large percentages and explore possible ways of decreasing the impact.** For example, if the large percentage is due to the clustering of students in special programs at a particular school, then the district may want to reallocate those services so students could be supported in the school they would have normally attended if not disabled.⁵⁴

- i. Document how PPSD will accomplish the above.** Identify staff accountability, roles and responsibilities, time frames, and demonstrable outcomes.

Self-Contained and Private Settings

7. Reduce reliance on educating students with disabilities in self-contained and separate school settings; improve performance of students remaining in these settings.

- a. Collect and analyze data** about students currently educated in self-contained and separate school settings, such as the school they would attend if not disabled; their performance levels in reading, math, and behavior; and other information relevant to

⁵⁴ See article that was sent to district staff under separate cover for additional information on this topic: *Students with Severe Disabilities and Best Practices*, from Frattura, E. and Capper, C. (2007), *Leading for Social Justices: Transforming Schools for All Learners, Providing Access to High-Quality Teaching and Learning*, Chapter 9: Students Who Significantly Challenge Our Teaching.

the supports they would need if educated in general education classes for greater periods of time. Investigate if the district's data for separate schools includes students from the separate Birch Vocational Center.

- b. Identify characteristics of students in order to plan for less restrictive settings.*** Identify the characteristics of students who could attend their local or school of choice and the supports they would require to do so. Address current administrative barriers to more inclusive instruction, such as “full classes,” scheduling, etc., bringing issues to the superintendent's cabinet when necessary. Through the IEP process, consider implementation on an individualized basis in midyear 2011-12 and/or September 2012.
- c. Use a consultant for advice about educating more students with autism within general education classes.*** Consider using a consultant who has significant experience with the successful education of students with autism who are in general education for a greater portion of the day and follow up on specific recommendations. To prepare for such consultation, gather data on students' attendance area schools, ages, school grades, academic performance, social/emotional and language skills, equipment and supply needs, etc.
- d. For students with significant behavior challenges, implement improved social/emotional supports at each school and address the personnel issues affecting the Behavior Intervention Program.*** It is essential that more students be educated successfully in general education classes in order for the district to have the capacity to effectively support those with the most intensive needs. Identify any schools with an unusually large number of students being referred to separate settings or separate schools. In both circumstances, consider the strength of current PBIS efforts at tiers 2 and 3 and need for improvement. It is anticipated that recommendation 5 regarding PBIS and social/emotional support will improve school capacity.
- ***Improve the Behavior Intervention Program.*** Section D below addresses personnel issues related to the provision of substitutes for paraprofessionals, assignment of highly skilled special education teachers and paraprofessionals, and administrative support. In addition, consider asking the district's consultant, Dr. Diana Browning Wright, to review the Behavior Intervention Program's current structure and make recommendations, including training for behavior coaches and teachers to implement evidence-based behavioral strategies for tier 2 and 3 interventions.
 - ***Investigate private school interest in collaborating with the district to provide supports to students in PPSD schools and, if there is sufficient interest, identify and address any contractual barriers to such collaboration.*** The district should aggressively pursue this course of action to support students with significant social/emotional issues.

- e. Eliminate “fundamental” courses.* Review current courses and their descriptions to ensure that students with disabilities who take the regular NECAP assessments are not given separate “fundamental” courses. These students should have access to core curricular standards—with accommodations—if they are to have any chance of improving performance on these assessments. Recommendations 5 and 6 provide additional information for supporting students with disabilities taking classes aligned with the core curriculum.

In addition to the personnel issues discussed above, section D addresses strategies for increasing the number of special education teachers who are highly qualified and knowledgeable in core curricular areas.

Instruction for English Language Learners with Disabilities

- 8. Identify and provide more flexible models to support the education of ELLs with disabilities.** Establish a working group with staff members from general education, ELL, special education, gifted and talented, research and accountability, and schools to review research-based practices on language acquisition and on providing language support to students with disabilities (without a waiver) in a manner that would enable them to be successfully educated in classes they would attend if not disabled. As part of this process, consider how bilingual/ESL staff can be used to help improve the effectiveness of monolingual staff to provide instruction and services to ELLs with disabilities, and share information through professional development, technical assistance, co-teaching, etc. In addition, consider how special and general education teachers who are not ESL-certified and paraprofessionals can receive training on effective strategies to support or scaffold student language development. Based on the results of this work, (1) establish relevant board policy, (2) include relevant activities in school-based planning for RTI and inclusive education guidance, and (3) implement professional development activities, revised walk through protocol, etc. Also, consider any data changes necessary in REG to support differing service models for ELL students.

Support for Postsecondary Transitional Activities and Services

- 9. Develop a districtwide, comprehensive, and coordinated vision for transition services; plan to implement this vision.** To provide a research-based system of transition services and activities, review current activities to determine the extent to which they align with the 16 evidence-based predictors of post-school employment, and success in independent living found in the correlational study published by the National Secondary Transition Technical Assistance Center and the National Center for Workforce Development website.
 - a. Ensure the Birch Vocational Center operates consistently with research-based practices.* As part of the review above, and with the involvement of Birch parents and staff, conduct a comprehensive analysis of the Birch Vocational Center to determine the extent to which the program is aligned with accepted research sources. Also, obtain information showing the school’s budget and per pupil cost. Based on the results,

prioritize any programmatic components that require change, and develop a cost-neutral implementation plan that includes an aggressive time frame.

- b. *Expand community-based supportive work and employment.*** Develop a working group of diverse stakeholders (including business, community, state agencies, special education personnel, staff from high schools, and the Birch Vocational Center) to review district practices in the area of community-based supported work and employment, and establish measurable standards for school-based practices at every high school. As part of this process, identify and address barriers, including improved access to transportation for Project WORK, and steps to be taken that would enable students to engage successfully in this activity. For example, engage and educate students/parents about the benefits of work experiences and how any payment for work may (or may not) impact federal benefits.
- c. *Research the need and possibilities for expanding the Transition Academy.*** Identify how many students may benefit from enrollment in the Transition Academy. Assuming the number is more than the current 14, share the information with partner agencies and Johnson and Wales University to identify ways to meet this need.
- d. *Ensure Electronic Transition System Is Fully Implemented.*** Resolve outstanding issues with implementing the new electronic data system and ensure that it is put into place at all district schools.

Section D. Support for Teaching and Learning

Special Education Management and Operations

10. Reorganize the special education office in the following ways:⁵⁵

- a. *Employ one director for special education and support services.*** Although focus group participants provided positive comments about the two special education directors, the district's size does not justify having two different leaders for this area. Instead, one voice in special education and support services will provide more consistency and accountability and will eliminate previous overlapping responsibilities. The director should have responsibility for the overall management and operation of special education, providing leadership to managers and collaborating with PPSD education-related administrators. (*1 administrative assistant*)
- b. *Establish manager positions to assist the director in the administration and operation of the office.*** Instead of layering districtwide and grade-level programmatic responsibilities on top of direct support to schools, consider establishing the following manager positions:

⁵⁵ It is anticipated that these changes would be budget neutral. Also, the recommendations are offered with recognition that they represent details that would likely be modified based on further review and consideration.

- ***Programmatic manager*** to provide leadership in the areas of behavior (including PBIS, behavior coaches, behavior intervention programs), physical restraint training, autism teams, and alternative assessments. *(1 administrative assistant for this and next three managers)*
- ***Clinical and other support manager*** to provide support for all related-service personnel, assistive technology, vision/mobility, adapted physical education, scheduling psychiatric evaluations, etc.
- ***Data support manager*** to coordinate electronic IEP processes and develop on-demand data reports.
- ***Business operations manager*** to provide support on the budget, Medicaid billing, taxi vouchers, private school billing, etc.
- ***Elementary-level manager*** to (1) support teaching and learning's direction for RTI/PBIS and provide direction for inclusive educational services; (2) implement program quality reviews; (3) coordinate extended school year and home instruction; (4) support preschool and child find activities; (5) coordinate professional development activities for elementary level schools; (6) liaise with the Local Advisory Committee; (7) support human resource activities; and (8) attend teaching and learning and grade level meetings. *(1 administrative assistant for manager and coordinators)*
- ***Secondary-level manager***. Same as above but support transition activities (instead of early childhood activities.) The current transition coordinator would report to this manager. *(1 administrative assistant for manager and coordinators)*
- ***Preschool manager*** to provide support for preschoolers with disabilities, including curriculum development, teaching strategies, mandates from RIDE, child outreach screening, working with the pre-k community, transition to kindergarten, early intervention, and coordinating with the 24 pre-k classrooms and three pre-k teams.
- ***Lead psychologists, social workers and speech/language pathologists***. Investigate the possibility of reducing the caseloads of the two leads in each area to support their effectiveness. *(1 administrative assistant)*

Include under one or more of these managers the responsibility for developing the procedures necessary for implementing federal and state compliance activities. As discussed in recommendation 11, transfer to Human Resources the responsibility for recruiting and screening teacher assistants.

- c. Redefine the specialist position as a coordinator (or other title) to directly support schools that are under the supervision of the elementary- or secondary-level manager.*** Coordinators would directly support schools and teachers in all areas for

which the elementary- and secondary-level managers are responsible. In addition, the coordinators would support the work of the other programmatic managers in their respective schools. Assign five coordinators to elementary schools and four to middle and high schools. The additional support at the elementary level would assist coordinators in being the district's representative at IEP meetings until individuals in the elementary schools can be identified to carry out this function. In the meantime, provide sufficient training to elementary school related-service personnel and special educators to conduct these meetings pursuant to federal and state requirements.

- d. Provide sufficient professional development for personnel to enable them to carry out their responsibilities.*

Staffing Patterns and Usage

11. Establish the following procedures and practices designed to enhance the expertise of personnel involved in the instruction of students with disabilities:

- a. With university collaboration and exemplary core content teachers, aggressively provide professional development to special education teachers who do not have necessary core curriculum knowledge and skills.*
- b. Review the proportion of personnel hired as a special education teachers and teacher assistants; review use of occupational therapists.* With a representative group of principals, consider effective models for utilizing more special educators and fewer teacher assistants in a budget neutral way. In addition, review the use of occupational therapists and whether the ratios in place are necessary to meet the needs of students.
- c. Establish criteria-based hiring practices for special educators and teacher assistants.* As soon as possible, implement criteria-based hiring for teachers and teacher assistants. As part of this process, determine if there is any way to address the seniority-based filling of positions without having to hire previously hired teachers who are now without jobs. Also, take steps to end the practice of midyear job shifting, given the negative impact this practice has on students, particularly those with significant disabilities. In particular, establish hiring criteria for teachers and teacher assistants working with students who have intensive needs (e.g., autism, social/emotional, communication, hearing, vision, etc.).
- d. Ensure the appropriate and effective use of teacher assistants.* Issue a reminder to principals that teacher assistants shall not be asked to leave instructional duties to perform clerical or other nonrelated instructional activities, and investigate/follow up on any noncompliance the practice might involve.
- e. Aggressively explore the use of substitutes for absent teacher assistants.* The use of substitutes would require discussion with the union because the current requirement indicates that once teacher assistants work 60 days they become a long-term substitute, which entitles them to benefits.

- f. Expect Human Resources to engage in expanded recruitment, screening, and hiring in the area of special education and related services.* Set expectations for Human Resources to expand advertising for and recruitment individuals for teacher assistants so there is a sufficiently large applicant pool to fill all positions at the beginning of the year. Interview and screen individuals applying to become teacher assistants, and increase support for recruiting and hiring special education teachers certified in core content areas, and bilingual staff members with expertise working in challenging behavior, speech/language pathology, and multiple languages.
- g. Explore the use of “virtual” speech/language therapy when the need exceeds capacity.*
- h. Pursue more flexible work rules, including:*
- Job descriptions that enable teacher assistants to fulfill various childcare worker duties that do not require specific educational requirements, e.g., changing diapers and that enable childcare workers to provide incidental supplementary instructional support to students.
 - More flexible role descriptions that support changing needs, e.g., asking secretaries to input SWIS behavior data on-line; expecting an ESL teacher’s duties include supporting an ELL student in a class that is not designated as “ESL” etc.
 - Enabling teacher assistants to serve as bus monitors and/or enabling bus monitors to be trained to restrain a student as appropriate.
- i. Increase professional development opportunities for teacher assistants.* Collaborate with the union to provide more training for teacher assistants, including comprehensive initial training before the school year and again midyear for new hires as needed and for assistants involved with students having significant needs. Training should include strategies for supporting co-teaching and core PBIS principles and strategies.

Parental Support and Involvement

12. Reinforce PPSD’s efforts to promote effective parent involvement in the education of their children with disabilities by considering the following:

- a. To support consistent grade-level attendance at LAC meetings by principals and special educators, rotate volunteer principal/teacher involvement, with an understanding that the responsible individual will arrange for a substitute if unable to attend a meeting.* As part of this process, the superintendent and chief academic officer would stress the importance of this activity and why their participation and sharing of information is beneficial to parents and their children.

- b. Share with the LAC leadership the feedback that sessions might be best grouped or organized around relevant grade levels.* While the meetings may continue to address parents for all grade levels, it may be appropriate to divide some presentations and discussion into specific preschool, elementary, middle, and high school components to make them more relevant and attractive to parents and stakeholders.
- c. Consider the benefits of possibly translating IEPs into Spanish and providing Spanish language translators for IEP meetings upon request.* Establish procedures for notifying appropriate staff about meeting these requests.
- d. Establish a LAC subgroup to discuss ways to improve communication between parents and schools, including sharing information about special education requirements, identification of school-based contacts, etc.* Consider one-page parent information sheets that could be available in schools and other convenient locations, such as the ones recently developed by the Detroit Public Schools. See appendix D.
- e. Investigate if it is possible to obtain from RIDE the district's non-reported percentage of parents with a child receiving special education services reporting the school facilitated parental involvement as a means of improving services and results.* Based on the results, establish in-district target for improved performance.

Professional Development

- 13. Based on the recommendations on professional development included in this report, have the PPSD leadership team consider how professional development could be organized effectively and mandated to accomplish desired goals.** As part of this process, consider the district's capacity and need for training using webinars, videos, and assessments, as well as coaching and mentoring, to ensure that all required staff have access to quality professional development, internalize information, and use what they learn. Especially important is identifying ways that special educators can learn core content information in a practical and user-friendly manner.

Use of Technology and Data

- 14. Improve how PPSD uses technology to support staff personnel and students receiving special education services.**
 - a. Improve electronic IEP reporting.* Follow up on the district's discussions with its vendor about plans for migrating data between Easy IEP and REG and fully utilizing the electronic IEP system, including useful data edits, compliance notices, and routine and advance reporting. Discontinue the use of manual special education data entry into REG. Making these changes should also improve the district's ability to monitor IEP-service documentation, and this should have a positive impact on Medicaid billing.

- b. Authorize approved special education personnel to download software* for assistive technology, electronic transition planning process, etc.
- c. Ensure that reported data are accurate.* Investigate the basis of inconsistent data reported by PPSD and RIDE in the areas discussed in this report: graduation and dropout rates and compliant-transition data. If possible, identify ways to correct inconsistent reporting in the future.
- d. Stop the practice of centralizing special education student records at the special education office.* Aggressively develop procedures for the confidential maintenance of student special education records at the student's school, and for transferring these records between schools upon student transfer. The process should align with the process used for maintaining all student records in schools. Carry out this transfer of the special education records back to the schools as quickly as possible, with accountability measures for their maintenance.

Section E. Accountability for Expected Practices and Results

- 15. Enhance PPSD's system of accountability by incorporating core measurable expectations, including those for RTI/PBIS, inclusive instruction, outcome indicators required by the SPP, etc.** Establish, communicate, support, and monitor clear expectations and "non-negotiables," establishing clear lines of accountability and responsibility across departments, aligning them with the relevant guidance document. Require schools to incorporate effective activities into their school improvement plans to meet these expectations into their school improvement plans (e.g., walk-throughs and professional development), and incorporate them into administrator, principal, teacher, teacher assistant, and related-service personnel evaluations. Establish school-based targets for meeting these expectations that would enable the district to meet or exceed all state performance targets. Expect executive directors to review, monitor, and support activities to meet targets with collaborative support from the special education office.
- 16. Communicate clear expectations for principal accountability for the administration and operation of special education at the school level.** Establish clear oral and written communications to principals and their executive directors on principal accountability for special education operations and administration. To support this process, provide principals with the professional development and support they need (1) to provide leadership for effectively educating students with disabilities in general education classes with the provision of supplementary aids and services; (2) to ensure that students educated in separate classes have access to the core curriculum and positive behavior supports; and (3) to set up systems for appropriate eligibility determinations, IEPs and required services, manifestation-determinations, etc. To this end, provide sufficient training to new executive directors and principals either before or soon after they begin their tenure.
- 17. Establish a process whereby the core measurable outcomes referred to in**

Recommendation 15 are actively reviewed and acted upon. Following the oft-quoted saying, *what gets measured gets done*, regularly gather relevant stakeholders to review data and identify actions that need to be taken when the review indicate necessary follow-up action. Stakeholders would include relevant executive directors and principals, special/general education, and other relevant administrators. Such meetings should rotate reviews on such data elements for students with and without IEPs as (1) graduation rates (at beginning of year), (2) dropout rates (periodically when data are available), (3) credits earned and failure and “D” grading rates, (4) unexcused absences, (5) suspensions (in-school and out-of-school, by race/ethnicity) and office referrals, (6) use of PBIS and RTI, (7) referrals for special education evaluations and the percentage of students found eligible by disability area, (8) and SPP performance indicators. The Baltimore City Public Schools have been using this process successfully and, as a result, principal accountability in this area has become a reality.

CHAPTER 5. SYNOPSIS AND DISCUSSION

The Providence Public School District (PPSD) has made important strides over the last several years, including efforts by the school board and administration to overhaul and update the school system's instructional programs. This work has laid an important foundation for future student achievement gains and has set the stage for next steps in modernizing instruction for students with disabilities and English language learners, the subject of a parallel report by the Council of the Great City Schools.

This report was prepared by the Council at the request of the school board and the former superintendent, Tom Brady, as the district was beginning to turn its attention to how its new instructional system would work with special education and bilingual students. As it turns out, the city school district's leadership was right to ask for assistance, because the situation that the Council of the Great City Schools and its Strategic Support Teams found warranted substantial reform.

The PPSD has a higher special education identification rate than the nation (but slightly lower than the state) and identifies students as learning disabled and emotionally disturbed at higher rates than the nation. White, African American, and Native American students are all more likely to be identified as disabled in Providence than their same-race peers nationwide. And English language learners are more likely to be identified as needing speech/language services or as developmentally delayed. In addition, PPSD's referral rates have been increasing, and the district has lower-than-expected eligibility-determination rates, raising questions about the number of unnecessary evaluations and the extent to which school-based teams appropriately screen referred students to determine the basis for suspecting a disability. The district also appears to over-use psychiatric evaluations for students believed to have autism or emotional disturbances.

Most importantly, the achievement levels of students with disabilities are well below state performance targets and the overall academic attainment of special education students has not been improving. It is also clear from the Council's review that the district lacks sufficient capacity to differentiate language acquisition issues from disabilities among English language learners. In addition, PPSD lacks a fully developed academic or behavioral Response-to-Intervention (RTI) system. It does not have consistent monitoring of practice, it has weak data systems and poorly integrated technology, and it lacks a uniformly applied transition framework.

The school district also fails to include students with disabilities in general education classes at target rates, and it educates a higher percentage of its special education students in separate schools or classrooms than should be expected. Moreover, the district lacks a sufficient number of content-certified special education teachers, deploys an overly generous

number of teacher assistants, and has an administrative arrangement that is not well organized.

Rounding out these challenges is the fact that no one in the district is really held accountable for the well being or the achievement of students with disabilities.

However, the Providence Public School District does have a number of substantial assets in its special education program upon which it can build, however. For instance, people across the district whom the Council's team interviewed made positive comments about many of the central office staff members, for their helpfulness in managing the evaluation process. Moreover, the district has seen a slight decline in its overall identification rates, in part, because of responsiveness by some staff members to the academic and behavioral needs of students with disabilities who are in the general education program. In addition, the district has seen some decline in its disproportionality rates and the state has indicated that the rates do not appear to be the result of inappropriate practice. Also, the district generally conducts timely initial evaluations and has provided extensive professional development to evaluation teams.

Students with disabilities also score reasonably well on the state's alternative assessments, and PPSD is not far off the state's targets for graduating students with a regular diploma after four years. Dropout rates among students with disabilities have also seen some decline over the last several years. Finally, the district has put into place a more standardized curriculum and instructional program that is bound to produce higher student achievement over the long run.

Still, the school district has considerable work to do in order to have a better functioning special education program. The Council of the Great City Schools and its Strategic Support Team have made a number of recommendations to improve programming for students with disabilities over time. Some of these proposals involve—

1. improving the consistency of eligibility determinations across the district
2. strengthening the special education referral and screening process;
3. revising the use of psychiatric evaluations;
4. improving the evaluation process for English language learners;
5. using data to better identify students with disabilities who are not on track for graduation;
6. reducing out-of-school suspensions and unexcused absences;
7. implementing a comprehensive Response-to-Intervention (RTI) system for reading, math, and behavior;
8. strengthening differentiated professional development around an RTI model;
9. moving toward greater inclusion of students with disabilities into general education classes and regular schools;
10. reducing the numbers of students in self-contained classes and separate schools;

11. boosting the accountability systems for staff members on the academic and behavioral progress of students with disabilities;
12. providing a more uniform and consistent transitional program for students leaving high school;
13. linking technology and data systems more convincingly; and
14. reorganizing central office staff in a more effective manner, among other recommendations.

In general, the special education program in the Providence Public School District has considerable work to do if it expects to adequately meet the academic, behavioral, and social needs of its students with disabilities. However, with greater leadership, focus, and planning, there is little reason that the district cannot meet that goal. The Council and its other city school systems participating in this review stand ready to assist the district toward that end, and the organization remains confident that the Providence school system will rise to the occasion on behalf of its students with disabilities.

APPENDIX A. VALID AND RELIABLE ASSESSMENTS FOR PRESCHOOL ENGLISH LANGUAGE LEARNERS

Concerns about valid and reliable assessments for three- and four-year-olds are exacerbated for English Language Learners (ELL) at that early age. When selecting an assessment, one must be clear about the purpose of the assessment: (1) to set a benchmark for current English and Spanish performance or (2) to determine the possible need for special education services. Various experts provided feedback to the Council's team about valid and reliable assessments for each purpose:⁵⁶

- Three assessments (Stanford Spanish Language Proficiency Test, Language Assessment Scales, and IDEA Language Proficiency Test) allow for assessments across languages using the same measure, i.e., Spanish and English, providing a determination of a student's relative proficiency and dominance in these two languages. Such assessments are useful for young children who are developing language in both English and Spanish.
- The Preschool Language Scale (fourth edition in Spanish, 2002) and the new Comprehensive Evaluation of Language Function (CELF) for preschoolers (second edition in Spanish, 2009) are well-regarded assessments used to assess language skills of young Spanish-speaking children. Speech/language pathologists use the CELF to help differentiate between speech/language impairments and developmental stages of acquiring a second language.

To the extent these assessments provide information about language proficiency and dominance, they contribute to knowledge about a child's preferred language. Additional assessments can expand understanding about the child's language acquisition to help determine the provision of services (to the extent there is an option to provide them in the child's native language). Also, the tools provide important information for making decisions about whether a student's academic deficiencies or poor performance may be due to second language acquisition or to a disability.

All experts caution against relying on a single measure for such decision making. Particularly

⁵⁶ The above guidance was provided to the Council of Great City Schools' Strategic Support Team by Claudia Rinaldi, Ph.D., senior training and technical assistance associate, Urban Special Education Leadership Collaborative. Leadership and Learning Innovation, Education Development Center, and Sylvia Linan-Thompson, associate professor and fellow UT, Austin, Learning Disabilities, Department of Special Education, College of Education at The University of Texas at Austin.

when using assessment results for evaluating ELLs, staff must be cognizant that a score might indicate a “lack of exposure” to language as opposed to a particular disorder in language development. It is not uncommon that ELL and immigrant families (as well as families living in poverty) lack exposure to language due to such factors as hectic work schedules, culturally determined interactions between child and parent, or low levels of literacy of adults in the home. The results from any of the mentioned assessment tools are best interpreted along with a comprehensive socio-contextual history of the child to help interpret his/her literacy and language development in first and second languages.⁵⁷

⁵⁷ Tania N. Thomas-Presswood, Ph.D., associate professor of psychology, Gallaudet University. Specialty areas are cognitive, educational and neuropsychological assessment of children, including those who are deaf and hard of hearing; cultural and linguistic diversity; and economically disadvantaged children and families.

APPENDIX B. EVIDENCE-BASED PREDICTORS OF POST-SCHOOL EMPLOYMENT, EDUCATION, AND INDEPENDENT LIVING SUCCESS⁵⁸

Predictors/Outcomes	Education	Employment	Independent Living
Career Awareness	X	x	
Community Experiences		X	
Exit Exam Requirements/High School Diploma Status		X	
Inclusion in General Education	X	X	X
Interagency Collaboration	X	X	
Occupational Courses	X	X	
Paid Employment/Work Experiences	X	X	X
Parental Involvement		X	
Program of Study		X	
Self-Advocacy/Self Determination	X	X	
Self-Care and Independent Living	X	X	X
Social Skills	X	X	
Student Support	X	X	x
Transition Program	X	X	
Vocational Education	X	X	
Work Study		X	

⁵⁸ National Secondary Transition Technical Assistance Center (2010). Evidence-Based Practices and Predictors in Secondary Transition: What We Know and What We Still Need to Know, Charlotte, NC, NSTTAC at <http://www.nsttac.org/ebp/ExecsummaryPPs.pdf>

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APPENDIX C. STAFFING RATIOS

Students with Disabilities (SwD) Incidence Rates and Special Educators Staffing, April 2011

	Total Enrollment	SwD Incidence		Sp Educator			Para-educator			Speech/Lang			Psychologist		
		% SwD	SwD Enr	Number	Ratio To:		Number	Ratio To:		Number	Ratio To:		Number	Ratio To:	
					SwD	Enr		SwD	Enr		SwD	Enr		SwD	Enr
Agawam Public Schools	4,347	15%	656	39	17	112	100	7	44	15	44	290	3	219	1449
Atlanta Public Schools	43,443	11%	4,950	431	11	101	224	22	194	65	76	688	22	225	1975
Austin Pub S D	84676	10%	8,062	772.5	10.4	110	824	9.7	103	70.5	114	1201	34.6	233	2447
Baltimore City Publ Sch	82,824	16%	12,866	1,121	12	74	620	21	134	92	140	901	12	NA	NA
Boston Public Schools	54,966	21%	11,534	1200	10	47	800	14	70	147	78	383	48	240	1173
Cambridge Publ Schools	6,000	20%	1,200	176	7	35	103	12	59	20	60	300	22	55	273
Carpentersville	19,844	15.8%	3,139	227	13.8	87	380	8.3	52	43	73	461	28	112	708
Chicago Pub Sch	419,272	13%	52,409	3,753	14	112	2,905	18	145	392	134	1072	235	223	1788
Clark Cty School Dist	309,476	10%	32,167	2,247	15	138	1,346	24	230	299	108	1036	180	179	1720
Cleve Hts-Univ Hts Cty	6,000	18%	1,100	83	14	73	58	19	104	7	158	858	8	NA	NA
D.C. Public Schools	48,991	18%	8,603	669	13	74	653	14	76	90	96	545	78	111	629
Davenport	15,302	12%	1,857	188	10	82	287	7	54	NA	NA	NA	NA	NA	NA
Deer Valley Unified SD	36,086	9%	3,289	190	18	190	229	15	158	49	68	737	108	31	335
Denver Public Schools	78,352	12%	9,142	592	16	133	528	18	149	94	98	834	98	94	800
ESD 112	13,764	14%	1,987	55	37	251	158	13	88	20	100	689	12	166	1147
Elgin U-46, IL	40,531	14%	5,658	273	21	148	277	20	146	72	78.6	563	20	283	2027
Everett Public Schools	6,100	17%	1,049	74	15	83	51	21	178	4	263	1525	5	210	1220
Fort Worth	79,885	8%	6,144	520	12	154	450	14	178	73	85	1095	31	199	2577
Houston Indepen SD	200,568	9%	17,489	1,625	11	124	1,145	16	176	158	111	1270	NA	NA	NA
Kalamazoo Pub Schools	12,100	14%	1,667	70	24	173	79	22	154	15	112	807	NA	NA	NA
Kyrene School District	17,910	9%	1,544	141	11	128	124	13	145	27	58	664	14	111	1280
Lakota Local	18,500	10%	1,800	126	15	147	120	15	155	39	47	475	18	100	1021
LAUSD	632,881	13%	82,326	4,470	19	142	8,470	10	75	379	218	1670	599	138	1057
Lincoln	1,060	12%	128	21	7	51	21	7	51	5	26	212	2	64	530
Marlborough Public Sch	4,835	25%	1,198	141	9	35	115	11	43	7	172	691	4	300	1209
Memphis City	110,863	15%	16,637	912	19	122	655	26	170	53	314	2092	58	287	1912
Miami-Dade	376,264	11%	40,012	2,500	17	151	1,226	33	307	209	192	1801	206	195	1827
Montgomery Cty Sch	146,812	12%	17,226	1,588	11	93	1,398	13	106	293	59	502	97	178	1514
Naperville IL 203	1978	11%	1978	150	13	120	237	8	76	33	59	549	22	90	824
New Bedford	12,692	21%	2,655	204	14	63	205	13	62	26	103	489	9	295	1411
Oak Park Sch Dist 97	5,400	16%	875	78	12	70	90	10	60	14	63	386	8	110	675
Pittsburgh Pub Schools	28,000	18%	5,096	359	14	78	252	20	110	40	127	700	16	319	1749
Portland Public Schools	46,596	14%	6,513	355	19	132	535	13	88	92	71	507	56	117	833
Providence	23,695	18.8%	4460	340	13	70	339	13	70	40	111	592	28	159	846
Rockford IL Pub S	28,973	14%	4,065	336	12	86	334	12	87	49	83	591	24	169	1207
Round Rock	43,000	8%	3,313	369	9	117	171	20	252	41	81	1049	29	115	1483
San Diego Unified SD	132,500	12%	16,300	1,100	15	121	1,300	13	102	196	84	677	129	NA	NA
Saugus, MA	3,012	15%	462	28	17	108	29	16	104	6	77	502	NA	NA	NA
Sch Dist of Philadelphia	168,181	20%	33,686	1,535	22	110	610	56	276	99	341	1699	100	337	1682
Sun Prairie Area S Dist	6,656	10%	697	62	12	108	93	8	72	14	50	476	7	100	951
Tucson Unified SD	56,000	14%	8,092	409	20	137	419	20	134	61	133	919	54	150	1038
Washoe County Sc Dist	63,310	14%	8,551	472	19	135	325	27	195	77	112	823	37	232	1712
Williamson Cty Schl	31,292	9%	2,824	213	13	147	400	7	78	34	121	911	23	178	1346
Worcester	24,825	21%	5,172	254	21	98	366	15	68	38	137	654	NA	NA	NA
Averages		12.7			15	116		16	122		125	986		181	1427

Review of Special Education in the Providence Public School District

Ratios for Social Workers, Nurses, and OTs and PTs to Students with Disabilities (SwD) and Total Student Enrollment, Staffing Survey of Urban School Districts, April 2011

Ratios for Social Workers, Nurses, OTs and PTs	Total Student Enrollment	Total SwD	Social Worker			Nurse			OT		PT	
			Number	Ratio To:		Number	Ratio To:		Number	Ratio	Number	Ratio
				SwD	Enr		SwD	Enr				
Agawam Pub Schools	4,347	656	0	NA	NA	8	82	544	3	219	3	219
Atlanta Public Schools	43,443	4,950	30	165	1448	58	85	511	12	413	3	1650
Austin Pub S D	84,676	8,062	21	384	4032	68	119	1245	19	424	13	620
Baltimore City Public	82,824	12,866	193	67	430	78	165	1062	20	644	5	2574
Boston Public Schools	54,966	11534	6	NA	NA	100	115	563	67	172	17	680
Cambridge Pub School	6,000	1,200	16	75	375	0	NA	NA	16	75	7	172
Carpentersville	19,844	3,139	36.5	86	544	27.5	114	722	22	142	6	523
Chicago Pub School	419,272	52,409	358	119	1174	336	156	1250	106	494	37	1416
Clark Cty School Dist	309,476	32,167	26	NA	NA	173	186	1789	68	474	29	1100
Cleve Hts-Univ Hts Cty	6,000	1,100	7	158	858	5	220	1200	2	550	1	1100
D.C. Public Schools	48,991	8,603	90	96	545	127	68	386	48	180	16	538
Davenport Comm Sch	15,302	1,857	NA	NA	NA	7	266	2186	NA	NA	NA	NA
Deer Valley Unified SD	36,086	3,289	0	NA	NA	37	89	976	19	174	4	823
Denver Public Schools	78,352	9,142	74	124	1059	77	119	1018	25	366	12	762
Elgin U-46, IL	40,531	5,658	50	113	810	76	74	533	22	257	4	1414
ESD 112	13,764	1,987	0	NA	NA	5	398	2753	6	332	3	663
Everett Public Schools	6,100	1,049	2	525	3050	11	96	555	2	525	3	350
Fort Worth	79,885	6,144	2	NA	NA	106	58	754	16	384	10	615
Houston Indepen SD	200,568	17,489	26	673	7715	25	700	8020	17	1029	8	2187
Kalamazoo Pub	12,100	1,667	5	334	2420	2	834	6050	4	417	3	556
Kyrene School District	17,910	1,544	0	NA	NA	4	386	4478	2	772	2	772
Lakota Local	18,500	1,800	6	300	3084	14	129	1322	8	225	2	900
LAUSD	632,881	82,326	275	300	2302	575	144	1101	159	518	28	2941
Lincoln	1,060	128	5	26	212	2	64	530	2	64	1	128
Marlborough Public	4,835	1,198	9	134	538	10	120	484	4	300	2	599
Memphis City	110,863	16,637	55	303	2016	68	245	1641	11	1513	9	1849
Miami-Dade	376,264	40,012	35	NA	NA	206	195	1827	65	616	23	1740
Montgomery Cty Sch	146,812	17,226	14	NA	NA	NA	NA	NA	112	154	61	283
Naperville, IL 203		1978	27	73	671	29	68	625	4	494	3	659
New Bedford	12,692	2,655	67	40	190	30	89	424	11	242	3	885
Oak Park Sch Dist 97	5,400	875	12	73	450	8	110	675	7	1125	1	875
Pittsburgh Pub Sch	28,000	5,096	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Portland Pub Schools	46,596	6,513	10	652	4660	0	NA	NA	20	326	9	724
Providence	23,695	4460	35	127	677	0	NA	NA	11.5	388	4.5	991
Rockford IL Pub S	28,973	4,065	26	135	1114	32	127	905	12.5	325	4.5	903
Round Rock	43,000	3,313	0	NA	NA	1	NA	NA	10	332	3	1105
San Diego Unified SD	132,500	16,300	3	NA	NA	129	127	1028	40	408	10	1630
Saugus, MA	3,012	462	4	116	753	5	93	603	2	231	1	462
S Dist of Philadelphia	168,181	33,686	31	NA	NA	280	121	601	20	1685	20	1685
Sun Prairie Area S Dist	6,656	697	8	88	832	1	NA	NA	5	140	2	349
Tucson Unified SD	56,000	8,092	26	312	2154	53	153	1057	10	810	4	2023
Washoe Cty Sc Dist	63,310	8,551	0	NA	NA	35	248	1836	12	713	7	1222
Williamson Cty Schl	30,942	4,093	4	1024	7736	37	111	837	22	187	5	819
Worcester	24,825	5,172	0	NA	NA	0	NA	NA	12	431	5	1035
Averages				283	2224		158	1246		427		1144

Incidence Rates and Students with Disabilities to Staff Ratio in Ascending Order

Rank	% SwD	Sp. Ed. Teachers	Para-educator	Speech	Psych	Social Work	Nurses	OT	PT
1	8%	7	7	26	31	26	58	64	128
2	8%	7	7	44	55	40	64	75	172
3	9%	9	7	47	64	67	68	140	219
4	9%	9	8	50	90	73	74	142	283
5	9%	10	8	58	94	73	82	154	349
6	10%	10	8.3	59	100	75	68	172	350
7	10%	10.4	9.7	59	100	86	85	174	462
8	10%	11	10	60	110	88	89	180	523
9	10%	11	10	63	111	96	89	187	538
10	11%	11	11	68	111	113	93	219	556
11	11%	11	11	71	112	116	96	225	599
12	11%	12	12	73	115	119	110	231	615
13	12%	12	12	76	117	124	111	242	620
14	12%	12	13	77	138	127	114	257	659
15	12%	12	13	78	150	135	115	300	663
16	12%	12	13	79	159	134	119	325	680
17	12%	13	13	81	166	158	119	326	724
18	13%	13	13	83	169	165	120	332	762
19	13%	13	13	84	178	300	121	332	772
20	13%	13.8	13	85	178	300	127	366	819
21	14%	14	14	96	179	303	127	384	823
22	14%	14	14	98	195	312	129	388	875
23	14%	14	14	100	199	334	144	408	885
24	14%	14	15	103	210	384	153	413	900
25	14%	15	15	111	219	525	156	417	903
26	14%	15	15	108	223	652	165	424	991
27	14%	15	16	111	225	673	186	431	1035
28	15%	15	16	112	232	1024	195	474	1100
29	15%	16	18	112	233	NA	220	494	1100
30	15%	17	18	114	240	NA	245	494	1105
31	15.8%	17	19	121	283	NA	248	518	1222
32	16%	17	20	127	287	NA	266	525	1414
33	16%	18	20	133	295	NA	386	550	1416
34	17%	19	20	134	300	NA	398	616	1630
35	18%	19	20	137	319	NA	700	644	1650
36	18%	19	21	140	337	NA	834	713	1685
37	18%	19	21	158	NA	NA	NA	772	1740
38	18.8%	19	22	172	NA	NA	NA	810	1849
39	20%	20	22	192	NA	NA	NA	1029	2023
40	20%	21	24	218	NA	NA	NA	1125	2187

Review of Special Education in the Providence Public School District

41	21%	21	26	263	NA	NA	NA	1513	2574
42	21%	22	27	314	NA	NA	NA	1685	2941
43	21%	24	33	341	NA	NA	NA	NA	NA
44	25%	37	56	NA	NA	NA	NA	NA	NA
Average	12.7%	15	16	125	181	283	158	427	1141

APPENDIX D. DETROIT PUBLIC SCHOOLS INFORMATIONAL LEAFLET

Response to Intervention & Child Find, Referral and Special Education Eligibility

Special Education Fact Sheet for Parents

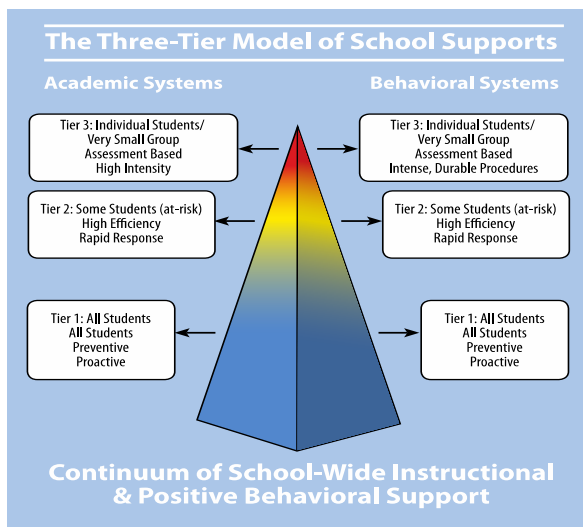
Detroit Public Schools

Response to Intervention (Rti)

Response to Intervention (Rti) is a framework designed to focus on and provide high-quality instruction and interventions to students who may be struggling with learning or positive behavior issues. For such students, a Resource Coordinating Team (RCT) supports the provision of interventions in general education.

The RCT works with parents, staff and community members to address school-wide and student-based issues. The team develops plans designed to support a student’s academic as well as social, emotional and physical development.

Based on a student’s identified academic or behavioral needs, the RCT identifies interventions that are provided in addition to the student’s grade level core curriculum. The student’s progress is monitored and the RCT uses the results to determine: the effectiveness of the student’s instruction and interventions; and if they are actually supporting student progress. Based on these results, the RCT may recommend more intensive or different interventions.



Parents’ Role in Rti

Parents actively support the Rti process by:

- Attending RCT meetings, sharing information and providing feedback.
- Making suggestions to the team about the types of adult responses that encourages the child to perform better.
- Asking about the interventions being used and suggested for academic and/or behavioral problems. When possible, using the same strategies or interventions at home.

- Asking the team about the progress the student is making and what is being recommended if there has not been much if any progress.
- At home, providing praise to the child for his or her progress.
- Asking questions when information is not clear.

Child Find

Through ongoing child find efforts, the Detroit Public Schools identifies, locates and evaluates all children with disabilities between the ages of three through 25 who reside in the city of Detroit and who are suspected of needing special education and related services. This includes children with disabilities who are homeless, wards of the State, or attending private schools located in Detroit.

Referral for a Special Education Evaluation

A parent may believe that his/her child is not making sufficient progress through Rti, or has reasons to suspect that a disability is involved and the child needs special education and related services. In this case, the parent has a right to refer the child for a special education evaluation. The child’s teacher or other school staff members can also refer to the child. If school officials determine that an evaluation is not needed for the child, the parent is given the reasons for that decision in writing, along with a notice of the parent’s rights e.g., request ng an impartial mediator or due process hearing.

Tips for Parents: When asking for an evaluation:

- Give the reasons for the request and provide as much detail as possible, such as reports from outside evaluators or doctors.
- Request the evaluation in writing and keep a copy of the request; and ask for a signed and dated copy of the request. Parents also may send the request by certified mail, return receipt requested. Another possibility is to send the referral through email or fax.

Evaluations and Reevaluations

The evaluation process is used to determine whether a child or youth has a disability and the nature and extent of the special education and related services that may be needed.

Before any evaluation (or reevaluation) begins, the parent:

- Is involved in deciding the content of the evaluation; and
- Must provide written informed consent

The child or youth is assessed in all areas of his or her suspected disability including (as appropriate): academic achievement, social/emotional development, communication and speech/ language skills, intellectual functioning, motor abilities, health, vision, and hearing.

✓ Information given by parents is an important part of the evaluation process.

Eligibility for Special Education Related Services

Within 60 days from the date the parent consents in writing to the evaluation, the IEP team (including the parent) determines whether the child or youth has a disability and, if so, needs special education and/or related services.



Step-by-Step Special Education Eligibility

Step 1 - Referral. Parents, teachers or other school staff members refer a child for an evaluation to determine eligibility.

By 14 School Days

Step 2 - Review of Referral: School staff determine if there is reason to suspect a disability and need for special education. If yes, the IEP team (including the parent) designs the evaluation and asks for written parental consent.

Timeline Begins with Parent Consent

Step 3 - Parent Consent: The evaluation can't occur unless the parent gives written informed consent. The evaluation timeline begins on the date of written parental consent.

Step 4 - Evaluation: Various qualified school district personnel conduct the evaluation based on the IEP team's design. Usually, it includes information from the parent and teachers, individuals conducting the assessments, and class observations. The parent can ask to see the evaluation reports prior to the IEP team meeting.

60 School Days

Step 5 - IEP Meeting to Determine Eligibility: By the 60th school day following parental consent, the IEP team (including parents) meets to review evaluation results and determine eligibility for special education. If yes, the team develops an IEP. Reevaluations occur every three years.

Disability Areas & Related Services

Disability Areas & Related Services

Autism	Multiple Disabilities
Cognitive Disability	Orthopedic Impairment
Deaf-Blindness	Other Health Impairment
Deafness	Specific Learning Disability
Developmental Delay	Speech/Language Impairment
Emotional Disability	Traumatic Brain Injury
Hearing Impairment	Visual Impairment

Related Services

Related services are those necessary for a student to benefit from his/her special education. The list includes but is not limited to the areas below.

Audiology Counseling Services	Psychological Services
Social Work Services	Parent Counseling & Training
Occupational Therapy	Orientation & Mobility Services
Physical Therapy	Recreation
School Health Services	Rehabilitation Counseling
Transportation	

Parent Consent Needed for Initial Placement

Step 6 - A parent must give written informed consent before the child receives any special education or related services. The IEP must be initiated as soon as possible, but not later than 15 school days after the parent is notified. The IEP, however, may state the services will begin at a later date – as long as the decision is based on the needs of the child or youth.

Parent Involvement in the Referral Process:

Parents can be actively involved in their child's education by:

- Getting information about resources available in or through a child's school, and talking to other parents, teachers and community organizations.
- Learning about the legal rights of parents, and being prepared for and actively participating in IEP team meetings.
- Asking questions about terms, language, or other information that is not clear.
- Asking (in writing) for an informal meeting or IEP team meeting to address concerns about a child's educational progress or behavior.

Parent Resources

Michigan Department of Education's Parent Procedural Safeguard Notice
<http://www.tisd.k12.mi.us/hps/Procedural%20Safeguards%20Booklet2.pdf>

Wayne RESA's Suggested List of parent organizations
http://www.resa.net/downloads/special_education/parent_organization_2009.pdf

2003 Wayne RESA's Parent Handbook
http://www.resa.net/downloads/special_education_guidelines/parent_handbook.pdf

U.S. Office of Special Education Programs website for Parent Resources:
<http://www.ed.gov/parents/needs/speced/resources.html#Parents>

APPENDIX E. DOCUMENTS AND DATA REVIEWED

- Disability Rates over Time
- Disability Rates by Grade Level Over Time
- Current Percentage of Students with Disabilities (SwD) of Total Enrollment by Disability Areas and Percentage of All SwD of the Total Enrollment
- District Public School and Clinical Program Students ages 6-21
- Private Parochial Schools Serving SwD ages 6-21
- Service Plan Students
- Public School and Clinical Students with Limited English Proficiency (LEP) Status 2010-11
- Public School and Clinical Students with FRP Status 2010-11
- Public School and Clinical Students by Race 2010-11
- 2010 School Classification Multiyear Analysis Report
- NECAP Reading and Math Proficiency Levels
- Rhode Island School and District Accountability System, Technical Bulletin, March 2011
- Evaluation and Referral Data over Time
- Discussion of Initiatives to Ensure Appropriate Referrals
- Referral for an Evaluation to Determine Eligibility For Special Education
 - a. Eligibility and Evaluation
 - b. Review of Existing Data
 - c. Parental Consent, Refusal of Consent, or Revoking of Consent
 - d. Eligibility Report
 - e. Eligibility Criteria at a Glance
- Rhode Island Criteria and Guidance for the Identification of Specific Learning Disabilities
- Graduation Rates
- Dropout Rates
- Attendance Rates
- Staffing Data
- RTI/PBIS Progress Monitoring, Including Elementary and Secondary Multi-Tiered Model
- Teacher Support Teams Forms and Procedures
- Overview of Behavior RTI
- Suspensions/Dismissals/Expulsions Data
- LRE Data by Disability, Race, Grade
- Description of Data Reports, Including Evaluation Log, Referral Counts
- Indicator 11 Report
- Out-of-Compliance Report
- District's Vision, Mission, Goals, and Priorities
- Memorandum of NECAP Reading and Math Results, Office of Special Education and the Office of Research, Planning and Accountability

- Beliefs and Commitments of the Providence School Board
- Providence School District Corrective Action Plan, 2009-10 and 2010-11 Academic Years
- Instruction, Strategic Direction Policy
- Principal Performance Metrics
- Educator Evaluation System Standards
- Teacher Evaluation Handbook
- Providence School Choice Policy and Procedures
- Description of Efforts to implement Positive Behavior Supports
- Special Education Administration and Job Descriptions, including Organization Charts
- Methods to Ensure SwD are Provided High Quality Instruction
- Continuum of Services and Related Services
- Disproportionality Update/Emotionally Disturbed Procedures
- Update from RIDE on Disproportionality Data, February 15, 2008
- Fiscal Data Impacting Special Education and Related Services
- Services to Non-Public Schools/Proportionate Share
- Research-Based Services to Students with Autism
- State Performance Plan Indicators
- Letter from RIDE dated September 9, 2010 on SPP and Action Plan from PPSD from October 8, 2010
- SPP Quarterly Reports for School Year 10-11
- RIDE Letters on SPP, February and March 2011
- Providence School Department Plan--Disproportionality
- Overview of Professional Development for the Office of Special Education, including Agendas of PD and Middle School Professional Development Guide
- Public Consulting Group Evaluation of the Providence Special Education Program, Phase 1 Evaluation Findings, October 2006
- Referral and Eligibility Procedures
- Overview of Projects Carried out with ARRA Funds
- Sample IEPs
- Sample Psychological Evaluations and Eligibility Reports

APPENDIX F. TEAM AGENDA AND INDIVIDUALS INTERVIEWED

Tuesday, April 12, 2011

Team Dinner

Time	Name	Position
5:45-8:00	Superintendent Brady	Superintendent
	Paula Shannon	Executive Director of Curriculum Development and Implementation
	Karen Vessella	Secondary Director of Special Education
	Lisa Vargas-Sinapi	Elementary Director of Special Education

Wednesday, April 13, 2011

Time	Name	Position
8:00-9:00	Lisa Vargas-Sinapi	Director of Elementary Special Education
	Karen Vessella	Director of Secondary Special Education
9:00-10:00	Mary Cullen	Secondary Special Education Supervisor
	Gail DeRoy	Secondary Special Education Supervisor
10:00-11:00	Nkoli Onye	Executive Director of High Schools
	Gary Moroch	Executive Director of Elementary Schools
	Marc Catone	Executive Director of Middle Schools
11:00-12:15	Ginger Olivelli	Elementary General Education Teacher-Grade K ESL at Veazie
	Lauren Hall	Elementary General Education Teacher-Grade 1 Inclusion at Carnevale
	Carolyn Richardson	General Education Teacher-Grade 1 at GJ West
	Silvana Larame	Bilingual Inclusion General Education Teacher
	Lillian Turnipseed	Secondary General Education Teacher
	Galo Reyes	Secondary General Education Teacher
	Arianna Testa	Secondary General Education Teacher
	Mark Manzo	Secondary General Education Teacher
12:15-12:45 Working Lunch		
12:15-12:45	Marco Andrade	Director of Research Planning and Development
	Emily Klein	RIDE
1:45-2:45	Sheila Gryzch	Special Education Teacher-Autism S/C at Carnevale
	Jen Tsonos	BIP Program at Carl Lauro

Review of Special Education in the Providence Public School District

	Julie Arruda	Spec Ed Teacher/Co-Teach Flynn
	Emily Hayes	Pre-K MLK Integrated Preschool
	Gloria Simoneau	Exceptional Children Services (Severe Disabilities)
	Kathleen Severian	Bilingual Pre-K Integrated
	Donna Hanley	Bilingual Inclusion Teacher Fortes Elementary
	Ana Feenstra	Elementary Special Education Specialist (Bilingual)
	Andrew Milligan	Secondary Special Education Teacher Inclusion
	Dot Kurbiec	Secondary Special Education Specialist
	Diane Fagan	Secondary Special Education Teacher Inclusion
	Joana Santos	Co-Teacher Bilingual
	Cynthia Robles	Secondary Special Education Teacher/Teacher Leader
2:45-3:00	Break	
3:00-4:00	Sharon Contreras	(Was not able to join us so the special education teachers listed above stayed longer)
4:00- 4:45	Andrew Henneous	Special Education Attorney (declined)
	June Daniels	School Board Attorney
	Maryann Carole	Special Education Attorney/works with Andrew Henneous (declined)
4:45-5:30	Mindy Mertz	Pre-K Special Education Supervisor/Assistive Technology
	Kathy Mastrobuono	Elementary Sp Ed Supervisor K-6
	Dawn Pelino	Elementary Special Education Supervisor K-6
	Susan Hartson	Elementary Special Education Supervisor K-6 and Parent Liaison
5:45-8:00 (Dinner)	Paula Shannon	Executive Director of Curriculum Development and Implementation

Thursday, April 14, 2011

Time	Name	Position
8:00-9:30	Gail Mastropietro	Lead Psychologist/PBIS
	Clea Poirier	Lead Psychologist/PBIS
	Jim Breen	Lead Social Worker
	Barbara Witbeck	Lead Social Worker
	Gail Robinson	Lead Speech/Language Pathologist
	Suzanne Maher	Lead Speech/Language Pathologist
	Shelli Roach	Bilingual Speech Therapist
	Wally VanDyck	Supervising Occupational Therapist
	Jackie Estrella	Occupational Therapist
	Lisa Devine-Keenan	Physical Therapist
	Danielle Petsch	Vision Teacher

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9:30-10:30	Maribeth Calabro	Teachers Union Representative
	Fr. Nick Milas	Teachers Union Representative
	Paul Vorro	Teachers Union Representative
	Aubrey Lombardo	Teacher Assistant Union-Local Union 1033
	Betty Jackson	Teacher Assistant Union-Local Union 1033
10:30-11:30	Mike D'Antuno	Acting Chief Financial Officer
	Anthony Vescera	Coordinator of Grant Oversight and External Funding
	Chris Petisce	Senior Budget Officer
	Carlton Jones	Chief Operations Officer
	Lois Cardarelli	Medicaid Specialist
	Andre Thibeault	Director of Operations
	Lou Dipaolo	Data Management (not available-later spoke on conference call)
	Penny Pare	Social Worker/Clinical Team
	Craig S. Parlato	Autism Speaks
11:30-12:00	Victoria Rodriguez	RIPIN (RI Parent Information Network)
12:00-12:30 lunch		
12:30-1:15	Soledad Barreto	Director of ELL K-8
	Kristi Bond	Director of Federal Programs (out of town)
	Marco Andrade	Director of Research and Development (moved to Wednesday)
	Denise Carpenter	Director of Drop-Out Prevention
1:15-1:45	Nancy Stevenin	Transition Director
1:45-2:15	Larry Roberti	Birch Vocational
2:15-2:30		Break
2:30-3:30	Susan Chin	Elementary Principal at Veazie
	Mariellen Boisclair	Elementary Principal at Carnevale
	Rachel Mellion	Elementary Principal at GJ West
	Lori Hughes	Elementary Principal at Charles Fortes
	Nicole Mathis	Middle School Principal at Greene
	Diana Larbi	Middle School Principal at DelSesto
	Wobberson Torschon	High School Principal at Alvarez (did not participate)
	John Hunt	High School Principal at Classical
3:30-4:00	Kathy Crain	President of the School Board (moved to conference call Thursday evening)
4:00-4:45	Leslie Gell	Ready to Learn Pre-K Agent
	Mary Pendergast	LAC Chair

Review of Special Education in the Providence Public School District

	Shavon Smith	Parent of student at Carnevale
	Charlene Borders	Parent
	Alfredo Nunez	Parent of student at Fortes
6:00 p.m.—2 a.m.	Working Dinner and Development of Findings and Recommendations (Conference call with School Board President, Kathy Crane 45 minutes approx. 7:45-8:30 p.m.)	
April 20, 2011	Follow-up conference call with Data/Technology—Peter Santos, Information Technology Officer and Lou DiPaolo, Data Information Consultant	

Friday, April 15, 2011

Time	Name	Position
12:30-1:00	Working Lunch	
1:15-2:45	Tom Brady	Superintendent
	Paula Shannon	Exec Director
	Karen Vessella	Secondary Director of Special Education
	Lisa Vargas-Sinapi	Elementary Director of Special Education
	Gary Moroch	Executive Director of Elementary
	Nkoli Onye	Executive Director of High Schools
	Marc Catone	Executive Director of Middle Schools
	Kathy Crane	School Board President

APPENDIX G. STRATEGIC SUPPORT TEAM

Karla Estrada

Karla Estrada is currently an administrator in the Division of Special Education in Los Angeles Unified School District (LAUSD). In this role, she works to organize projects for instruction, least restrictive environment, inclusion, autism, and transition. Karla works with staff, parents and students all over LA. She is part of the Central Team for School-Wide Positive Behavior Support implementation. She is also the Division of Special Education's representative in the development of training and projects for Response to Instruction and Intervention, she is a member of an Ad Hoc Team gathered to improve the educational opportunities of English Language Learners (ELLs) in LAUSD. Karla provides a great deal of professional development in schoolwide positive behavior support, classroom management, coaching classroom management, data-based decision making, and instruction/behavior support planning. Working with local district and school teams throughout LA, Karla has had multiple opportunities for building successful partnerships in meeting individual as well as district goals. Karla has degrees in general education and special education and is certificated in administration. She is also Board Certified Behavior Analyst (BCBA). She is currently in a doctoral program in educational leadership for social justice at Loyola Marymount University, with a dissertation topic focused on meeting the English language development needs of ELLs with specific learning disabilities. Her special interests include instructional practices that ensure positive educational outcomes for all students, as well as, exploring disproportionality issues affecting ELLs, students with disabilities, and at-risk youth. Karla is committed to creating educational opportunities and access for all children and supporting families and staff toward this common goal.

Sue Gamm, Esq.

Sue Gamm, a nationally recognized expert on special education, formerly served as chief specialized services officer for the Chicago Public Schools and division director for the Office for Civil Rights, Region V (Illinois, Minnesota, and Wisconsin). She has participated on Strategic Support Teams provided by the Council of the Great City Schools for school districts in the District of Columbia (1998), Guilford County, N.C., (2003), Richmond, Va., (2003), St. Louis (2003), Charleston, (2005), Milwaukee (2007), New York City, District 75 (2008), Rochester (2008), Boston (2009), Philadelphia (2009/2010), Pittsburgh (2009), and Austin (2010). Ms. Gamm recently served as consulting attorney on the Council's *amicus* brief in support of the New York City Board of Education in *Board of Education of the City School District of the City of New York v. Tom F., On Behalf of Gilbert F., A Minor Child* (2007). She currently consults with the Illinois State Board of Education on the state's monitoring of the Chicago Public Schools on least-restrictive environment (LRE) as part of the district's implementation of the *Corey H. v. ISBE* settlement agreement. Further, she consults with the Public Consulting Group and numerous school districts and state educational agencies and

provides training at national, state, and local conferences on special education matters, particularly in the area of special education disproportionality. In 2006, Ms. Gamm was an expert for the plaintiffs in *Blackman v. District of Columbia, et al.*, Civil Action No. 97-1629 (PLF) Consolidated with Civil Action No. 97-2402 (PLF) in the areas of special education policies, procedures, and practices. In Baltimore, she completed a review of special education services in 2004-05 for the city's public schools and was an expert for plaintiffs *Vaughn G., et al. v. Mayor and City Council of Baltimore, et al.*, Civil Action No. MJG-84-1911. Ms. Gamm has also done extensive special education consultation on LRE issues for the Los Angeles County School District and is a consultant for the class action consent decree in Los Angeles. Finally, Ms. Gamm has provided expert advice over the past five years to the New York City Board of Education. This assistance included writing a *Principal's Quick Reference Guide to Special Education* (2003). Ms. Gamm graduated with high honors from University of Illinois with a B.A. degree in regular and special education (1970) and earned a law degree from the De Paul College of Law (1976). She is admitted to practice before the Illinois Bar, the Federal Bar, and the U.S. Supreme Court Bar.

Will Gordillo

Will Gordillo is the administrative director for the Division of Special Education for Miami-Dade County Public Schools, the fourth-largest school district in the nation serving approximately 40,000 students with disabilities. In this role, he provides leadership for program planning and implementation, professional development, curriculum and instruction, and compliance in special education. In addition, his office oversees the direct operation of five exceptional student education centers serving students with emotional/behavioral disabilities and significant intellectual disabilities requiring the highest level of service intensity. He has extensive expertise in the areas of emotional/behavioral disabilities, inclusive practices, schoolwide positive behavior support, and the development of specialized programs for student ages 16-22, in collaboration with community-based organizations. In his present position, he has overseen the implementation of the Individuals with Disabilities Education Act (IDEA), Florida Inclusion Network, The Miami-Dade/Monroe Multiagency Network for Students with Emotional/Behavioral Disabilities (SEDNET), and Schoolwide Positive Behavior, and Florida Diagnostic Learning Resource System-South (FDLRS-S) grants. Mr. Gordillo has been an active administrative representative on the United Teachers of Dade County Special Education Task Force, the Superintendent's Advisory Panel for Students with Disabilities, and the Autism Task Force. He has been instrumental in developing a Local Education Agency (LEA) Resource Guide for program specialists, implementing a computerized individualized education program (IEP) system, and developing a plan of action to serve students with disabilities at or in close proximity to their home schools.

Julie Wright Halbert, Esq.

Julie Halbert has been legislative counsel for the Council of the Great City Schools for more than 16 years. In that capacity, she has served as a national education legal and policy

specialist, with emphasis on special education. She worked extensively on the reauthorization of the Individuals with Disabilities Education Act (IDEA) in 1997 and 2004. Ms. Halbert is responsible for drafting numerous technical provisions to the IDEA and providing technical assistance to Congress and the U. S. Department of Education. In 1997 and, again, in 2005, she testified before the U.S. Department of Education on its proposed regulations on IDEA 2004. Ms. Halbert has directed each of the Council's special education review teams, including special education reviews in the District of Columbia, Guilford County (NC), Richmond, St. Louis, Charleston, New York City, Rochester, Boston, Philadelphia and Pittsburgh. Halbert was also the counsel of record for the Council of the Great City Schools' *amicus* briefs in the Supreme Court of the United States in (a) *Board of Education of the City School District of the City of New York v. Tom F., On Behalf of Gilbert F., A Minor Child* (2007); (b) *Jacob Winkelman, a Minor By and Through His Parents and Legal Guardians, Jeff and Sander Winkelman, et al., v. Parma City School District* (2007); (c) *Brian Schaffer v. Jerry Weast, Superintendent of Montgomery County Public Schools, et al.*, (2005); (d) *Parents Involved in Community Schools v. Seattle School District* and *Meredith v. Jefferson County Board of Education* (2007) and *Forest Grove School District v. T.A.*, (2009). Ms. Halbert graduated with honors from the University of Maryland and the University of Miami School of Law. She is admitted to practice in the Federal Bar, the U.S. Supreme Court Bar, and the Florida and Pennsylvania Bars.

**APPENDIX H. ABOUT THE COUNCIL AND HISTORY OF STRATEGIC SUPPORT
TEAMS**

The Council of the Great City Schools is a coalition of 65 of the nation's largest urban public school systems, including Providence.⁵⁹ The organization's Board of Directors is composed of the Superintendent, CEO or Chancellor of Schools, and one School Board member from each member city. An Executive Committee of 24 individuals, equally divided in number between Superintendents and School Board members, provides regular oversight of the 501(c)(3) organization. The composition of the organization makes it the only independent national group representing the governing and administrative leadership of urban education and the only association whose sole purpose revolves around urban schooling.

The mission of the Council is to advocate for urban public education and assist its members in their improvement and reform. The Council provides services to its members in the areas of legislation, research, communications, curriculum and instruction, and management. The group convenes two major conferences each year; conducts studies of urban school conditions and trends; and operates ongoing networks of senior school district managers with responsibilities for areas such as federal programs, operations, finance, personnel, communications, research, and technology. Finally, the organization informs the nation's policymakers, the media, and the public of the successes and challenges of schools in the nation's Great Cities. Urban school leaders from across the country use the organization as a source of information and an umbrella for their joint activities and concerns.

The Council was founded in 1956 and incorporated in 1961, and has its headquarters in Washington, D.C. Since the organization's founding in 1956, geographic, ethnic, language, and cultural diversity has typified the Council's membership and staff.

⁵⁹ Albuquerque, Anchorage, Atlanta, Austin, Baltimore, Birmingham, Boston, Broward County (Ft. Lauderdale), Buffalo, Caddo Parish (Shreveport), Charleston County, Charlotte-Mecklenburg, Chicago, Cincinnati, Clark County (Las Vegas), Cleveland, Columbus, Dallas, Dayton, Denver, Des Moines, Detroit, Duval County (Jacksonville), East Baton Rouge, Fort Worth, Fresno, Guilford County (Greensboro, N.C.), Hillsborough County (Tampa), Houston, Indianapolis, Jackson, Jefferson County (Louisville), Kansas City, Little Rock School District, Long Beach, Los Angeles, Memphis, Miami-Dade County, Milwaukee, Minneapolis, Nashville, Newark, New Orleans, New York City, Norfolk, Oakland, Oklahoma City, Omaha, Orange County (Orlando), Palm Beach County, Philadelphia, Pittsburgh, Portland, Providence, Richmond, Rochester, Sacramento, Salt Lake City, San Diego, San Francisco, Seattle, St. Louis, St. Paul, Toledo, Washington, D.C., and Wichita

History of Council Strategic Support Teams of the Council of the Great City Schools

The following is a history of the Strategic Support Teams provided by the Council of the Great City Schools to its member urban school districts over the last 10 years.

City	Area	Year
Albuquerque		
	Facilities and Roofing	2003
	Human Resources	2003
	Information Technology	2003
	Special Education	2005
	Legal Services	2005
	Safety and Security	2007
Anchorage		
	Finance	2004
	Communications	2008
	Math Instruction	2010
Atlanta		
	Facilities	2009
	Transportation	2010
Austin		
	Special Education	2010
Birmingham		
	Organizational Structure	2007
	Operations	2008
	Facilities	2010
Boston		
	Special Education	2009
Broward County (FL)		
	Information Technology	2000
	Food Services	2009
	Transportation	2009
Buffalo		
	Superintendent Support	2000
	Organizational Structure	2000
	Curriculum and Instruction	2000
	Personnel	2000
	Facilities and Operations	2000
	Communications	2000
	Finance	2000
	Finance II	2003
	Bilingual Education	2009
Caddo Parish (LA)		

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	Facilities	2004
Charleston		
	Special Education	2005
Charlotte-Mecklenburg		
	Human Resources	2007
Cincinnati		
	Curriculum and Instruction	2004
	Curriculum and Instruction	2009
Chicago		
	Warehouse Operations	2010
	Special education	2011
Christina (DE)		
	Curriculum and Instruction	2007
Cleveland		
	Student Assignments	1999, 2000
	Transportation	2000
	Safety and Security	2000
	Facilities Financing	2000
	Facilities Operations	2000
	Transportation	2004
	Curriculum and Instruction	2005
	Safety and Security	2007
	Safety and Security	2008
	Theme Schools	2009
Columbus		
	Superintendent Support	2001
	Human Resources	2001
	Facilities Financing	2002
	Finance and Treasury	2003
	Budget	2003
	Curriculum and Instruction	2005
	Information Technology	2007
	Food Services	2007
	Transportation	2009
Dallas		
	Procurement	2007
	Staffing Levels	2009
Dayton		
	Superintendent Support	2001
	Curriculum and Instruction	2001
	Finance	2001
	Communications	2002
	Curriculum and Instruction	2005
	Budget	2005

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	Curriculum and Instruction	2008
Denver		
	Superintendent Support	2001
	Personnel	2001
	Curriculum and Instruction	2005
	Bilingual Education	2006
	Curriculum and Instruction	2008
Des Moines		
	Budget and Finance	2003
Detroit		
	Curriculum and Instruction	2002
	Assessment	2002
	Communications	2002
	Curriculum and Assessment	2003
	Communications	2003
	Textbook Procurement	2004
	Food Services	2007
	Curriculum and Instruction	2008
	Facilities	2008
	Finance and Budget	2008
	Information Technology	2008
	Stimulus planning	2009
Greensboro		
	Bilingual Education	2002
	Information Technology	2003
	Special Education	2003
	Facilities	2004
	Human Resources	2007
Hillsborough County (FLA)		
	Transportation	2005
	Procurement	2005
Houston		
	Facilities Operations	2010
	Capitol Program	2010
	Information Technology	2010
Indianapolis		
	Transportation	2007
	Information Technology	2010
Jackson (MS)		
	Bond Referendum	2006
	Communications	2009
Jacksonville		
	Organization and Management	2002
	Operations	2002

Review of Special Education in the Providence Public School District

	Human Resources	2002
	Finance	2002
	Information Technology	2002
	Finance	2006
Kansas City		
	Human Resources	2005
	Information Technology	2005
	Finance	2005
	Operations	2005
	Purchasing	2006
	Curriculum and Instruction	2006
	Program Implementation	2007
	Stimulus Planning	2009
Little Rock		
	Curriculum and Instruction	2010
Los Angeles		
	Budget and Finance	2002
	Organizational Structure	2005
	Finance	2005
	Information Technology	2005
	Human Resources	2005
	Business Services	2005
Louisville		
	Management Information	2005
	Staffing Levels	2009
Memphis		
	Information Technology	2007
Miami-Dade County		
	Construction Management	2003
	Food Services	2009
	Transportation	2009
	Maintenance and Operations	2009
	Capital Projects	2009
Milwaukee		
	Research and Testing	1999
	Safety and Security	2000
	School Board Support	1999
	Curriculum and Instruction	2006
	Alternative Education	2007
	Human Resources	2009
Minneapolis		
	Curriculum and Instruction	2004
	Finance	2004
	Federal Programs	2004

Review of Special Education in the Providence Public School District

Newark		
	Curriculum and Instruction	2007
	Food Service	2008
New Orleans		
	Personnel	2001
	Transportation	2002
	Information Technology	2003
	Hurricane Damage Assessment	2005
	Curriculum and Instruction	2006
New York City		
	Special Education	2008
Norfolk		
	Testing and Assessment	2003
Orlando (Orange County)		
	Information Technology	2010
Philadelphia		
	Curriculum and Instruction	2003
	Federal Programs	2003
	Food Service	2003
	Facilities	2003
	Transportation	2003
	Human Resources	2004
	Budget	2008
	Human Resource	2009
	Special Education	2009
Pittsburgh		
	Curriculum and Instruction	2005
	Technology	2006
	Finance	2006
	Special Education	2009
Portland		
	Finance and Budget	2010
	Procurement	2010
	Operations	2010
Providence		
	Business Operations	2001
	MIS and Technology	2001
	Personnel	2001
	Human Resources	2007
	Special education	2011
	Bilingual education	2011
Richmond		
	Transportation	2003
	Curriculum and Instruction	2003

Review of Special Education in the Providence Public School District

	Federal Programs	2003
	Special Education	2003
Rochester		
	Finance and Technology	2003
	Transportation	2004
	Food Services	2004
	Special Education	2008
San Diego		
	Finance	2006
	Food Service	2006
	Transportation	2007
	Procurement	2007
San Francisco		
	Technology	2001
St. Louis		
	Special Education	2003
	Curriculum and Instruction	2004
	Federal Programs	2004
	Textbook Procurement	2004
	Human Resources	2005
Seattle		
	Human Resources	2008
	Budget and Finance	2008
	Information Technology	2008
	Bilingual Education	2008
	Transportation	2008
	Capital Projects	2008
	Maintenance and Operations	2008
	Procurement	2008
	Food Services	2008
Toledo		
	Curriculum and Instruction	2005
Washington, D.C.		
	Finance and Procurement	1998
	Personnel	1998
	Communications	1998
	Transportation	1998
	Facilities Management	1998
	Special Education	1998
	Legal and General Counsel	1998
	MIS and Technology	1998
	Curriculum and Instruction	2003
	Budget and Finance	2005
	Transportation	2005

	Curriculum and Instruction	2007
Wichita		
	Transportation	2009