

**ACHIEVEMENT AND PROFESSIONAL DEVELOPMENT
TASK FORCE**

COUNCIL OF THE GREAT CITY SCHOOLS

Task Force on Achievement and Professional Development

2020-2021

Task Force Goals

To assist urban public school systems in teaching all students to the highest academic standards and in closing identifiable gaps in the achievement of students by race.

To improve the quality of professional development for teachers and principals in urban public education.

To alleviate the shortage of certified teachers and principals in urban schools.

To improve the recruitment and skills of urban school principals.

Task Force Chairs

Sonja Santelises, Baltimore CEO
Elisa Vakalis, Anchorage School Board
Deborah Shanley, Brooklyn College School of Education

ACADEMIC DEPARTMENT OVERVIEW



Academic Department Overview

January 2021

Overall Academic Department Goals/Priorities

The goal of the academic department is to support the work of urban educators to improve student achievement for all students in our member districts. The department collaborates with researchers to determine district systems and resources that correlate with improved student achievement. These results inform our recommendations to instructional leaders.

We share high-leverage information through publications and videos, and provide on-site strategic support teams, webinars, and job-alike conferences to facilitate networking and collaboration among our members. We collaborate with other national organizations including Student Achievement Partners (SAP) and Council of Chief State School Officers (CCSSO), and National Assessment Governing Board (NAGB) in support of raising student achievement in our member districts.

Our focus since spring has been on supporting districts throughout the COVID-19 crisis and the development of guidance for high quality professional development. We continue to provide technical assistance and written guidance for developing and implementing high-quality curriculum documents to support school staff in elevating teaching and learning to align to college- and career-readiness standards. Additionally, we offer guidance for assessing the level of implementation of curriculum standards within a district, and for increasing the functionality of academic key performance indicators.

COVID Response

Chief Academic Officer COVID-19 Weekly Virtual Meetings

Beginning March 24, 2020, instructional leaders were invited to join in a job-alike weekly forum to discuss challenges and approaches they were using to continue student learning and support during the sudden, rapidly changing landscape due to COVID-19 mandated school closures. To date, the Academic Team has facilitated 32 virtual meetings with CAO's and other instructional leaders to provide a safe space for speaking frankly and for sharing ideas with peers. Additionally, the Council developed a secure space for council member districts to access and share resources, PowerPoints, and other relevant information using the EdWires platform. We will continue to convene these meetings on a bi-weekly basis beginning January 12, 2021 and compile additional resources throughout the year. The team facilitated discussions that helped members consider how to maintain quality instruction while adapting to the challenges of ever-changing learning environments. Major topics included:

- Acceleration versus Remediation: Addressing Unfinished Learning
- Addressing instruction for students, including English language learners and students with disabilities
- Gathering feedback from teachers, students, and parents
- Adjustments to original remote plans
- Attendance, grading and promotion policies
- Learning Management Systems
- Adapting fall curriculum guidance for teachers using priority instructional content in ELA and Mathematics

- Insights gained from summer school implementation
- Reopening plans and instructional models
- Plans to re-engage students in the learning process in multiple instructional environments for the fall
- Plans for addressing Social Emotional Wellness and trauma
- Professional development for summer and fall
- *Addressing Unfinished Learning after COVID-19 School Closures*, Summer 2020
- Engaging and supporting parents and their children during remote learning
- Reopening of school considerations and instructional plans including:
 - Safety and health of adults and children
 - Planning parameters for closing/quarantine
 - Planning for the need to cycle between models as conditions shift
 - Staff deployment
 - Adult supervision considerations for remote learners
 - Secondary school scheduling
- Plans to build relationships, process experiences, and begin grade-level academics
- Metrics to monitor the effectiveness of distance learning (e.g., academics, student engagement, student perception of quality of distance learning)
- Formative classroom assessments to inform instruction in an online environment
- Successes and challenges in the reopening of schools and advice for those who are reopening in the coming weeks
- Professional development for substitute teachers working with remote learning
- Teacher union contracts and negotiation
- Planning virtual walk throughs and observations
- District plans and actions to locate students who are yet to enroll
- Examples from districts for addressing social-emotional learning while teaching grade-level priority content

CAO Task Force

A subset of the CAOs volunteered to meet weekly for eight weeks to provide guidance for implementing a districtwide approach to addressing unfinished learning in a just-in-time rather than a just-in-case model. Additionally, a portion of the task force provided their insights into key considerations for making decisions about which models would fit best in their district context and resources. This culminated in the development of CGCS written guidance in these two areas.



Addressing Unfinished Learning After COVID-19 School Closures

With funding from the Schusterman Foundation, the Council was able to enlist the help of nationally recognized experts in mathematics, English language arts and literacy, special education, and English as a second language to delineate a rationale and instructional approaches to address unfinished learning. The document emphasized that school districts would not only need to address the significant social and emotional toll that the crisis has taken on children, but also widespread unfinished learning. We have always had students who entered a grade level with unfinished learning; however, our previous, well-intentioned attempts to use remediation programs had the impact of keeping students from engaging in grade-level content and resulted in their falling further behind their peers.

The document highlights key transition grades and illustrates how focusing on essential content for the grade. This approach provides the space and opportunities to address underlying unfinished learning just in time for all students to engage in grade level work, and acquire facility with language demands, skills and concepts to accelerate their learning. To illustrate these approaches, the document provides examples of just-in-time scaffolds to accelerate student learning in mathematics and English language arts.

<https://tinyurl.com/ya4g73f9>

The Academic Team also collaborated with Student Achievement Partners on their *2020–21 Priority Instructional Content in English Language Arts/Literacy and Mathematics*. Districts can confidently focus on instructional content priorities in mathematics (K–8, high school) and ELA/literacy (K–12) for the 2020–21 academic year, and leverage the structure and emphases of college- and career-ready mathematics and ELA/literacy standards. This enables teachers to spend the necessary time to ensure that students can address the most essential learning and be prepared for the following school year.

Additionally, the Council completed a 3-part series of webinars that focused on translating the principles of *Addressing Unfinished Learning* into curriculum, instruction, pedagogy, and formative assessment. The Council and Student Achievement Partners developed and facilitated this series, along with experts and urban school district practitioners, to support and provide examples of implementing the principles of addressing unfinished learning. Key topics included: (1) how prioritized ELA/literacy and math content and addressing unfinished learning work in tandem as illustrated through unit design, tasks, and conceptual models, (2) successes and challenges in addressing unfinished learning while focusing on essential content, and (3) moving this work to scale. The recordings are available using this [link](#).

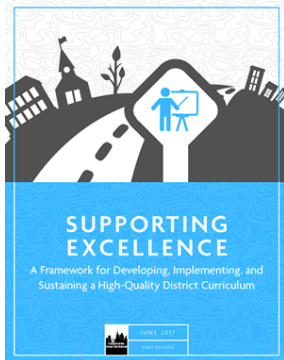
Current Activities/Projects

➤ *Supporting Rigorous Academic Standards*

Overview

With continued funding from the Bill and Melinda Gates Foundation and the Schusterman Foundation, the Council works to advance district capacity to implement college- and career-readiness standards, ensuring that all urban students have access to high-quality instructional materials, interventions, and programming. Additionally, funding from the Wallace Foundation supports our districts in enhancing the role of principal supervisors as instructional leaders. With school closures due to COVID-19, the Academic team collaborated within CGCS and with external partners and consultants to provide support to our members as they faced unprecedented challenges.

Assessing the Quality of District Curriculum and Providing Technical Support to Districts



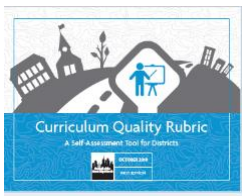
The academic team led the development of *Supporting Excellence: A Framework for Developing, Implementing, and Sustaining a High-Quality District Curriculum* with principles that are appropriate for all college- and career-readiness standards. This framework provides instructional leaders and staff with criteria for what a high-quality curriculum entail. Developed through combined efforts of Council staff together with school, district academic leaders, and other experts, this first edition framework includes annotated samples and exemplars from districts around the country. It also provides actionable recommendations for developing, implementing, and continuously improving a district’s curriculum. This emphasizes the importance of ensuring that the district’s curriculum reflects shared instructional beliefs and high expectations for all

students and clarifies the level of instructional work expected in every school. The document includes a study guide.

The CGCS academic team provides on-site as well as virtual technical assistance for district curriculum leaders and their teams throughout the curriculum development and implementation process. We customize our work for individual districts in determining implications for teaching and learning, curriculum development and refinement, implementation, and raising student achievement. Such technical assistance is available to member districts upon request.

Our next step in the curriculum development support process is to publish a second edition of the *Supporting Excellence: A Framework for Developing, Implementing, and Sustaining a High-Quality District Curriculum* that will address culturally responsive learning environments, include current research and best practices on scaffolding and support for diverse student populations, including English Language Learners, Students with Disabilities, and gifted students. We will also include additional considerations that will undergird learning environments to address social-emotional learning and trauma, including discourse in the classroom and specific teacher moves. The new edition will incorporate additional illustrations of key features that include writing samples across the content areas. It will include examples that incorporate the use of hyperlinks within curriculum documents. An advisory committee comprised of Chief Academic Officers, curriculum leaders in mathematics, English Language Arts, Bilingual education, and Special Education representing our member districts will provide guidance and feedback during the revision process.

Curriculum Quality Rubric



Based on the *Supporting Excellence: A Framework for Developing, Implementing, and Sustaining a High-Quality District Curriculum*, the Academic Team began the development of a rubric members can use to evaluate the quality of their curriculum guidance materials (January 2019-March 2019). During March 2019, the rubric was reviewed by members of the Task Force on Achievement and Professional Development during the CGCS Legislative Conference. Moreover, we convened an advisory committee of Chief Academic

Officers, curriculum leaders in mathematics, English Language Arts, Bilingual education, and Special Education from our member districts to provide additional feedback and test the rubric using their curriculum documents. The final version of the *Curriculum Quality Rubric: A Self-Assessment Tool for Districts* is available at www.cgcs.org. It is now in use in curriculum reviews.

Professional Development

The Council continues to work with its membership to develop a framework to explore the more salient features for developing, implementing, and sustaining high-quality professional development that subsequently results in changes in instructional practice and enhanced student achievement. In September 2019, an advisory committee was established. This committee is composed of Chief Academic Officers, curriculum leaders in mathematics, English Language Arts, Bilingual education, and Special Education representing our member districts. We have a panel of experts that have agreed to serve as critical friends in support of this work. Additionally, we have facilitated interviews with several renowned experts who have conducted significant research on effective professional development.

Since Fall 2019, the committee developed a common definition of and guiding principles for effective professional development and a draft framework that addresses current challenges in the wake of COVID-19. The draft framework includes: the definition and key features of a high-quality professional development program; descriptions of each key feature including “what it is” and “what it is not”; a rubric for self-assessing the district’s professional development program; and recommendations for evaluating the quality of both internal and external professional development programs.

Academic Key Performance Indicators



The Council developed academic key performance indicators (KPIs) in a process similar to the one used to develop operational KPIs. Using feedback from the Achievement and Professional Development Task Force, indicators were selected for their predictive ability and linkage to progress measures for the Minority Male Initiative pledge taken from a list of 200 potential KPIs.

Since SY 2016-17, the indicators were refined and became part of the annual KPI data collection and reporting. This now enables districts to compare their performance with similar urban districts and to network to address shared challenges.

➤ ***Balanced Literacy and Foundational Skills: Joint Project with Student Achievement Partners***

With funding from the Kellogg Foundation, the Council and Student Achievement Partners are collaborating with San Antonio Independent School District (SAISD) to pilot an augmented approach to balanced literacy. It provides research-based content and instructional practices to raise the literacy levels of students in K-1 so that they are able to read grade-level texts and are prepared for success in future grades. During planning year 2019-20, SAISD, CGCS, and SAP worked collaboratively to build the systems and structures to develop shared buy-in in the pilot schools, to strategically plan for evaluation, and to prepare for future scaling of implementation throughout the district. Their twelve pilot schools are receiving strong support in two areas: strengthening their systematic instruction of foundational reading skills and building their students' knowledge and vocabulary through using high-quality read alouds during the literacy block. Representatives from five-member districts are observing the process in order to guide future planning for implementation in their own districts. Currently, these member districts include: Cleveland Metropolitan, Charlotte-Mecklenburg, and Denver. Metropolitan Nashville continues to be part of this cohort as the pioneer district for the Early Reading Accelerators Pilot (ERA). Project leaders developed and facilitated a 3-part webinar series for continuing district support and implementation of ERA in the wake of COVID-19. In this 3-part series, hosted by the Council and Student Achievement Partners, experts and urban school district practitioners presented and discussed: (1) the latest findings about teaching foundational skills and making use of complex text as part of comprehensive literacy approach and (2) the pedagogy related to teaching foundational skills, including phonemic awareness to monolingual students and English Language Learners. The recordings for the series and additional resources are available using this [link](#).

Middle School Science Units developed by OpenSciEd

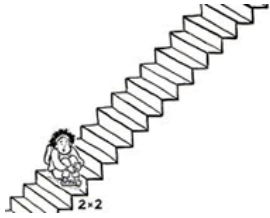
The Council conducted a virtual meeting, facilitated by OpenSciEd in the fall of 2019, to provide an overview of the recently released middle school science units, discuss the time schedule for the development and release of additional units, and share promising data from over 200 field test classrooms to illustrate how these units, when implemented effectively, can change students experiences in learning science. The Council and OpenSciEd conducted a follow-up virtual meeting in April 2020 after the release of three additional middle school units, one per grade level.

OpenSciEd is a project led by ten states and funded by four foundations committed to improving the supply of high-quality science curriculum aligned to new college and career ready standards. OpenSciEd is producing **freely** available units of study at the middle school level designed to address equity gaps in science by reorienting classrooms to be driven by student interest and curiosity.

➤ *Accessing CGCS Instructional Support Materials*

The Council of the Great City Schools developed the following tools to help its urban school systems and others implement college- and career-readiness standards.

Basics about the Standards



Staircase. Two three-minute videos (one in English and one in Spanish) that explain the Common Core. This is particularly good for presentations to community and parent groups. (2012)

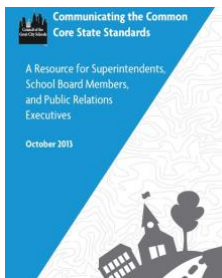
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Conversation. Two three-minute videos (one in English and one in Spanish) that explain how the Common Core State Standards will help students achieve at high levels and help them learn what they need to know to get to graduation and beyond. (2015)

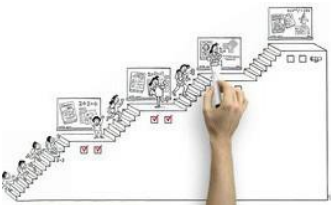
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Communicating the Standards



Communicating the Common Core State Standards: A Resource for Superintendents, School Board Members, and Public Relations Executives. A resource guide that helps district leaders devise and execute comprehensive communication plans to strengthen public awareness about and support for college- and career-readiness standards. (2013)

<http://bit.ly/2wi5tu6>



Staircase. Two 30-second Public Service Announcements (one in English and one in Spanish) to increase public awareness regarding Common Core standards for English Language Arts. Also, two 30-second Public Service Announcements (one in English and one in Spanish) to increase public awareness regarding Common Core standards for Mathematics. (2012)

<https://www.cgcs.org/Page/380>



Conversation. Two 30-second Public Service Announcements (one in English and one in Spanish) that explain how the Common Core State Standards will help students achieve at high levels and help them learn what they need to know to get to graduation and beyond. (2015)

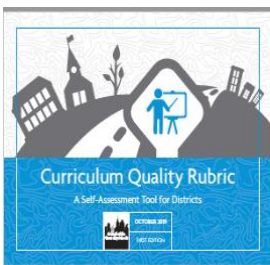
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Developing and Aligning Standards-based District Curriculum



Supporting Excellence: A Framework for Developing, Implementing, and Sustaining a High-Quality District Curriculum. A framework that provides instructional leaders and staff with a core set of criteria for what a high-quality curriculum entail. This guide includes annotated samples and exemplars from districts around the country. It also provides actionable recommendations for developing, implementing, and continuously improving a district curriculum, ensuring that it reflects shared instructional beliefs and common, high expectations for all students, and that it focuses the instructional work in every school. (2017)

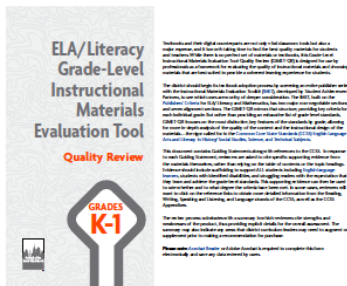
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Curriculum Quality Rubric: A Self-Assessment Tool for Districts is a companion resource to *Supporting Excellence: A Framework for Developing, Implementing, and Sustaining a High-Quality District Curriculum*. Districts can use the rubric to assess how well their district curriculum reflects the seven key features of a high-quality curriculum identified in the framework. Using the rubric and the framework, districts can revise their curriculum as a part of ongoing improvement and provide substantive guidance and support for teachers and administrators.

<https://www.cgcs.org/Page/643>

Selecting and Using Standards-based Instructional Materials



The Grade-Level Instructional Materials Evaluation Tool-Quality Review (GIMET-QR), (English Language Arts). A set of grade-by-grade rubrics and a companion document that define the key features for reviewers to consider in examining the quality of instructional materials in English Language Arts K-12. In addition, the tools are useful in helping teachers decide where and how adopted classroom materials could be supplemented. The documents align with similar tools developed by the Council for English language learners. See below.(2015)

While GIMET-QR was designed to support textbook materials adoption, feedback from Council members using the tool indicates that there are additional uses:

- 1) to assess alignment and identify gaps/omissions in current instructional materials;
- 2) to assess alignment of district scope and sequence, and the rigor and quality of instructional tasks and assessments; and
- 3) to provide professional development that builds capacity and a shared understanding of the CCSS in ELA/Literacy and/or Mathematics.

<http://www.cgcs.org/Page/474>



The Grade-Level Instructional Materials Evaluation Tool–Quality Review (GIMET-QR), (Mathematics). A set of grade-level rubrics and a companion document that define the key features for reviewers to consider in examining the quality of instructional materials in mathematics K-8. The key features include examples and guiding statements from the Illustrative Mathematics progression documents to clarify the criteria. (2015)

While GIMET-QR was designed to support textbook materials adoption, feedback from Council members using the tool indicates that there are additional uses:

- 1) to assess alignment and identify gaps/omissions in current instructional materials;
- 2) to assess alignment of district scope and sequence, and the rigor and quality of instructional tasks and assessments; and
- 3) to provide professional development that builds capacity and a shared understanding of the CCSS in ELA/Literacy and/or Mathematics.

<http://www.cgcs.org/Page/475>

Additional Tools and Resources

LEADCS: An electronic toolbox that includes research and additional vetted materials that member districts can use to make decisions about bringing computer science for all students to scale. This website was designed in partnership with the University of Chicago team at the Center for Elementary Mathematics and Science Education.

<https://www.cgcs.org/domain/290>

Alignment Projects: The Council continues to collaborate with Student Achievement Partners to create English Language Arts projects demonstrating how to adapt textbooks to the rigor of college-and career-readiness standards. The resources developed through these projects are available at <https://achievethecore.org/category/679/create-aligned-lessons>.

Read Aloud Project. A set of classroom tools that explain how to identify and create text-dependent and text-specific questions that deepen student understanding for kindergarten through grade 2. It contains more than 150 sample lessons.

Text Set Project: Building Knowledge and Vocabulary. A set of classroom tools that include materials and activities, enabling participants to create and use Expert Packs (text sets) to support students in building knowledge, vocabulary and the capacity to read independently for grades kindergarten through grade 5. Text sets are comprised of annotated bibliographies and suggested sequencing of texts to provide a coherent learning experience for students. This is accompanied by instructional guidance and tools for teachers, as well as a variety of suggested tasks for ensuring students have learned from what they have read.

Professional Development on the Standards



From the Page to the Classroom—ELA. A 45-minute professional development video for central office and school-based staff and teachers on the shifts in the Common Core in English Language Arts and literacy. The video can be stopped and restarted at various spots to allow for discussion. (2012). Districts can use portions of the video as a springboard for enhancing current implementation of the standards and supporting rigorous instruction.

<https://www.cgcs.org/domain/127>



From the Page to the Classroom—Math. A 45-minute professional development video for central office and school-based staff and teachers on the shifts in the Common Core in mathematics. The video can be stopped and restarted at various spots to allow for discussion. (2012) Districts can use portions of the video as a springboard for enhancing current implementation of the standards and supporting rigorous instruction.

<https://www.cgcs.org/Page/345>



The Great City Schools Professional Learning Platform. A series of 10 video-based courses for school administrators and teachers to enhance language development and literacy skills for English Language Learners and struggling readers. (2018)

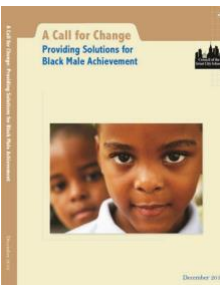
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Implementing High Standards with Diverse Students



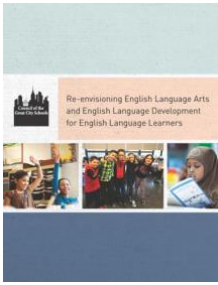
Common Core State Standards and Diverse Urban School Students: Using Multi-Tiered Systems of Support. A white paper outlining the key components of an integrated, multi-tiered system of supports and interventions needed by districts in the implementation of the Common Core with diverse urban students. (2012)

<https://www.cgcs.org/domain/146>



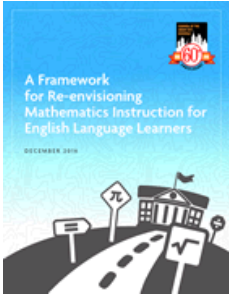
A Call for Change: Providing Solutions for Black Male Achievement. A book-form compendium of strategies by leading researchers that advocates for improving academic outcomes for African American boys and young men. Areas addressed include public policy, expectations and standards, early childhood, gifted and talented programming, literacy development, mathematics, college- and career-readiness, mental health and safety, partnerships and mentoring, and community involvement. (2012)

<https://tinyurl.com/yap8zll8>



Re-envisioning English Language Arts and English Language Development for English Language Learners. A framework for acquiring English and attaining content mastery across the grades in an era when new college- and career-readiness standards require more reading in all subject areas. (2014, 2017)

<http://tinyurl.com/yasg9xc4>



A Framework for Re-envisioning Mathematics Instruction for English Language Learners. A guide for looking at the interdependence of language and mathematics to assist students with the use of academic language in acquiring a deep conceptual understanding of mathematics and applying mathematics in real world problems. (2016)

<http://tinyurl.com/y7flpyoz>

Butterfly Video: A 10-minute video of a New York City kindergarten ELL classroom illustrating Lily Wong Fillmore’s technique for ensuring that all students can access complex text using academic vocabulary and build confidence in the use of complex sentences as they study the metamorphosis of butterflies.

<https://vimeo.com/47315992>

Assessing District Implementation of the Standards



Indicators of Success: A Guide for Assessing District Level Implementation of College and Career-Readiness Standards. A set of indicators districts might use to track their implementation of college- and career-readiness standards. Indicators are divided into seven sections, including: vision and goal setting, resource allocation, parent and community outreach, curriculum and instruction, professional development, assessment, and student data. Each section provides descriptions of what “on track” or “off track” might look like, along with examples of evidence to look at in determining effective implementation. (2016)

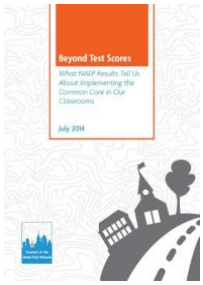
<http://tinyurl.com/hh6kesd>



Calendar of Questions. A series of questions about ongoing implementation of college- and career-readiness standards, arranged by month, focusing on particular aspects of implementation for staff roles at various levels of the district, as well as milestones for parents and students. (2013) These types of questions are still valid and can be customized for any districtwide project implementation.

<http://cgcs.org/Page/409>

Implementing Standards-based Assessments



Beyond Test Scores: What NAEP Results Tell Us About Implementing the Common Core in Our Classrooms. An analysis of results on four sample NAEP items—two in mathematics and two in ELA—that are most like the ones students will be seeing in their classwork and on the new common core-aligned assessments. In this booklet, the Council shows how students did on these questions, discusses what may have been missing from their instruction, and outlines what changes to curriculum and instruction might help districts and schools advance student achievement. It also poses a series of questions that district leaders should be asking themselves about curriculum, professional development, and other instructional supports. (2014)

[https://www.cgcs.org/cms/lib/DC00001581/Centricity/Domain/87/Beyond Test Score_July 2014.pdf](https://www.cgcs.org/cms/lib/DC00001581/Centricity/Domain/87/Beyond%20Test%20Score_July%202014.pdf)

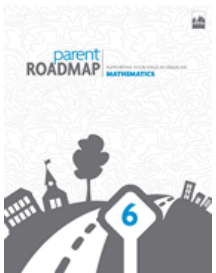
Resources for Parents about the Standards



A series of parent roadmaps to the Common Core in English Language Arts and literacy, grades K-12 in English and grades K-8 in Spanish. (2012)

<https://www.cgcs.org/Page/330> (English)

<https://www.cgcs.org/domain/148> (Spanish)



A series of parent roadmaps to the Common Core in mathematics, grades K-12 in English and K-8 in Spanish. (2012)

<https://www.cgcs.org/Page/366> (English)

<https://www.cgcs.org/Page/367> (Spanish)

➤ *Building Awareness and Capacity of Urban Schools*

Mathematics and Science

Under the leadership of Gabriella Uro, *A Framework for Re-envisioning Mathematics Instruction: Examining the Interdependence of Language and Mathematical Understanding*, informed the work of a Joint Procurement Project, to use the Council's joint purchasing power as an alliance to more effectively influence the market to produce higher quality materials that reflect the interdependence of language and mathematics for English language learners. This project included a Materials Working Group, composed of district practitioners and experts in mathematics and English language acquisition. This group provided concrete feedback to selected vendors on their revised units in their proposed materials.

On February 19, 2019, the Los Angeles Unified School Board approved the establishment of a nationwide “bench of contracts” with three publishers who have met the Council’s pre-determined quality criteria for ELL math materials: Curriculum Associates, LLC; Imagine Learning, Inc.; and Open Up Resources. This means that any school district in the nation can now use these contracts to purchase the vetted materials to support teachers of English learners.

➤ ***Curriculum, Research, and Instructional Leaders Meeting***

Due to COVID-19, the Council canceled the 2020 Curriculum, Research Directors and Instructional Leaders Meeting. However, the 2019 Curriculum, Research Directors and Instructional Leaders Meeting took place June 24-27 in San Diego, California with a focus on the root causes and current district efforts to support the lowest performing students across member districts. Participants engaged in discussions focused on identifying and sharing supports employed across member districts for students in abject poverty, students with disabilities, English learners, students with interrupted formal education, young men and women of color, and other traditionally marginalized students. Key areas of focus included:

- how youth development and the relationship between trauma, social emotional learning affect academic achievement
- how the knowledge of neurobiological and socio-behavioral science of adolescent development can be applied in educational systems to promote adolescent well-being, resilience, and development by addressing structural barriers to achieving academic success
- how districts intentionally address the needs of student populations that pose the greatest challenges and identifying those practices which have the potential for overcoming barriers to student success
- how districts intentionally plan and implement collaborative professional development for teachers of students with disabilities, English language learners, and general education teachers for overall academic success in urban districts

The conference featured a preconference presentation from the Council’s Research Team to engage participants in a walkthrough of the Academic Key Performance Indicators (KPIs) and topics in the KPI Report. This included opportunities for participants to interpret the results, assess the quality of the CGCS indicators, and determine next steps for using this data in strategic planning at the district level.

Kisha Stanley, Senior Director of Volunteerism for the United Way of Greater Atlanta and her team, engaged participants in a “Poverty Simulation” of what it might be like to be a part of a family with a low-income trying to survive from month to month. The purpose of this simulation was to provide participants with a shared experience of living in poverty for a month as a springboard to our opening session that included discussing insights and considerations about how current structures and policies in urban districts can better serve the needs of our most vulnerable student populations.

Elizabeth Cauffman, Professor of Psychological Science, Education and Law Department of Psychological Science, University of California-Irvine, shared information from a recently published report authored by the National Academies of Science, Engineering and Medicine, *The Promise of Adolescence: Realizing Opportunity for all Youth*. Dr. Cauffman connected our morning discussions to an examination of the neurobiological and socio-behavioral science of adolescent development, health, well-being, resilience, and agency including the science of positive youth development. She focused on how this knowledge can be applied to institutions and systems so that adolescent well-being, resilience, and development are promoted and that educational systems address structural barriers and inequalities in opportunity and access. Additional information and

recommendations were shared from the report, and subsequent discussions focused on how these recommendations impact education in urban school districts.

The School District of Palm Beach County won the 2019 Making Strides Together Award for its cross-functional teaming in planning, implementing, and monitoring progress on its use of Systems Analysis/Master Schedule (SAMS) cycles to ensure equity of access to and academic success in advanced and accelerated coursework for underrepresented students in specific demographics or minority student populations. This collaborative effort brought together Divisions of Performance Accountability, Information Technology, Human Resources, Curriculum, and Regional Administration.

➤ ***Academic Strategic Support Teams and Technical Assistance Partnering***

Districts continue to request strategic support team visits to answer specific questions raised by their superintendents for an objective analysis of their academic program. The School District of Philadelphia had a strategic support team visit January 2020 to examine the district's implementation of its math and reading programming. The team provided feedback as well as actionable recommendations designed to help the district improve student achievement in mathematics and reading.

In December 2019, the CGCS team led by Robin Hall assisted the Atlanta Public Schools' leadership team in identifying opportunities for strengthening the organizational, operational, and instructional effectiveness of its Teaching and Learning Department. In July 2019, we also provided feedback on curriculum documents for mathematics and English Language Arts in support of a CGCS team led by Gabriela Uro for Providence Public Schools. February 5-12, 2019, we assisted the CGCS team led by Gabriela Uro in making recommendations to Puerto Rico on its Bilingual Initiative.

January 14-17, 2020, the Council conducted a Strategic Support Team visit in The School District of Philadelphia that focused on reviewing aspects of the instructional program and making recommendations on how to improve that program to increase the academic achievement of students in the district. The final report was presented to the Board in February 2020.

TEXTBOOK AND BASAL SURVEY

Textbook and Basal Survey

Below is a textbook survey we would like for you to complete in the areas of English interested in the basal textbooks and the technology resources that the district spreadsheet to the appropriate personnel to be completed. Return the completed :

District Name: _____
 Contact Name: _____
 Email Address: _____

1. Please list each basal and textbook that your district central office supports with development for **Mathematics** in grades K-5.

Product Name	Publisher	Year

3. What Learning Management System (LMS) is your district using to perform activities, collect work, communicate with students, and host asynchronous lessons?

Name of the LMS	Grade	Used for ELLs (Y/N)

5. Please list the Instructional Technology programs (apps) in broad use. (ex. i-Ready, Dreambox, IXL)

Name of the Program	Subject(s)	Grade(s)

language arts/literacy and mathematics. We are specifically interested in supports in ELA and mathematics. Feel free to circulate the spreadsheet to rhall@cgcs.org by December 21, 2020.

written guidance and/or professional

Edition	Grade	Used for ELLs (Y/N)	Used for SWD (Y/N)



ties such as assign and

Used for SWD (Y/N)



2. Please list each basal and textbook that your district central office supports with written guidance and/or professional development for **Reading** in grades K-5.

Name of the Textbook	Publisher	Year	Edition	Grade

4. List your district's systematic phonics/foundational skills program. (ex. Intro Reading, Wilson Language Training, CORE)

Name of the Program	Publisher	Grade(s)	Used for ELLs (Y/N)	Used for SWD (Y/N)

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Used for ELLs (Y/N)	Used for SWD (Y/N)

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PROFESSIONAL DEVELOPMENT FRAMEWORK

Advancing Instruction and Leadership in the Nation's Great City Schools

A Framework for Developing,
Implementing, and Sustaining High-
Quality Professional Development

DRAFT NOT FOR DISTRIBUTION



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And finally, a special thanks to the leadership and members of the Council's joint Task Force on Achievement and Professional Development. The integrated nature of this group signals the organization's belief that professional development is not a separate area or endeavor, but central to the work that must be done to raise student achievement in our nation's big city schools.

Thank you.

The Council of the Great City Schools, March 2021

Part I: Overview

Purpose

This guide aims to present district instructional leaders and staff with a core set of criteria for what high-quality professional development entails. What makes this particular document different and useful is the focus on practical issues of district-level implementation in multiple teaching and learning environments. This is a guide designed by practitioners for practitioners, and it was important to the advisory committee and project team to develop a resource that provides clear, concrete guidance for district leaders based on our collective experience with best practices—and common pitfalls—in selecting, designing, implementing, and sustaining high quality professional development that not only represents what has traditionally worked in the past, but is nimble enough to meet the demands of the present.

Of course, the landscape of public education has changed drastically since work on this document began. In the wake of the COVID-19 pandemic and nationwide school closures, school districts have had to quickly adjust the way they support and equip teachers and staff to meet the needs of students in a virtual environment. The challenge in supporting and advancing this work, then, is to highlight both the enduring design features of effective professional development, while documenting and sharing the innovative and promising work being done across districts to support teaching and learning amidst rolling school closures and a stubbornly persistent worldwide pandemic.

To this end, the guide includes not only a discussion of the research, preconditions, and design principles for effective professional development programming, but annotated exemplars from districts around the country and a set of guiding questions to ensure that a district’s professional development programming meets the new and changing needs of teachers and maintains common, high expectations for all students. At the same time, we have endeavored to create a forward-looking, values-driven blueprint for the kind of professional learning opportunities that we feel would propel instructional excellence and equity in our nation’s public schools.

For the purposes of this framework, we will be addressing professional development for teachers, principals, and other school-based and central office instructional staff that is either designed, developed, provided, overseen, or supported by the district. Of course, the reality of extended virtual learning over the past year has meant that parents and other caregivers are supporting student learning in more critical ways than ever before, and this presents districts with a whole host of questions pertaining to the resources and outreach that might be necessary and appropriate to integrate them more intentionally into the instructional process. These questions are important and will clearly have an impact on the reach and efficacy of instruction for the foreseeable future. But for now, we want to take the opportunity to define professional development for district staff and leaders, to identify the preconditions that should exist to ensure the effective implementation of professional development, and to share what urban districts across the country are doing, what they can do, to provide the kinds of preparation that teachers and other instructional staff and leaders will need to support students and advance learning in the coming school year and beyond.

Defining Professional Learning and Development

Creating an organizational culture of high standards, inclusivity, and respect and advocacy for diversity requires a workforce that shares not only common instructional objectives and strategies, but a sense of urgency and ownership for the achievement and outcomes of all students. Professional development, therefore, is the mechanism by which a district signals its expectations and respect for educators, as well as its instructional vision and values. It is through the articulation of shared standards, assessment, professional development, and evaluation that a district creates an overarching “picture” of what educational excellence and equity should look like across the system, and how the diverse instructional needs and unfinished learning of students should be addressed in the context of grade-level content and rigor.

In this context, high-quality professional development for teachers of all students, as well as other school-based and central office instructional staff and leaders, comprises a coherent program of ongoing adult learning designed to improve and enrich the knowledge and skills of educators, and by extension the academic prospects of students. By “coherent,” we mean that professional development is thoughtfully and collaboratively planned; aligned to the district’s instructional standards and evaluation system; and consistent with the vision and beliefs a district holds—as well as the current understanding in the field—about what and how students should learn, what they are capable of achieving, and the role that teachers and leaders play in enabling all students to reach their potential in any learning environment.

These professional growth opportunities are purposefully selected and customized to the roles, responsibilities, and needs of the intended audience. They build educator capacity and agency by focusing on job-required competencies, content knowledge, mindsets, and behavior, while at the same time explicitly attending to *how* students learn, and the instructional, social, and emotional needs of a diverse student body.

High-quality professional development is not a one-time occurrence or event, but rather an essential component of a district’s long-term improvement process. As such, it should be designed as a continuous cycle of both structured and job-embedded learning through which educators have the opportunity to work together with their peers, to reflect on their practice, and to develop progressively more sophisticated understanding, knowledge, and skills. This learning, however, must be actionable and contextualized within the framework of daily classroom life—whether those classrooms are physical or virtual. The ultimate goal is not just to create more expert teachers, staff, and leaders, but to systematically change and improve the educational experiences and outcomes of students.

What the Research Says

The advisory committee spent a good deal of time investigating the research on professional development, looking for indications of what ultimately results in improvements in educator practice coupled with increases in student achievement. While this research base may be extensive, it is far from definitive when it comes to identifying any one program or approach that is

guaranteed to work in all districts or contexts. Moreover, there is very little research that specifically addresses the kinds of training K-12 teachers need—and the new modes of providing this training—in a virtual or hybrid learning environment.

Nonetheless, we can look to the research to help us identify general features or characteristics that best support and advance the quality of instruction in service of student achievement—whether this instruction occurs in a physical classroom or in a virtual space. In one meta-analysis researchers identified 35 well-defined studies that reported a positive impact on teacher practice and student outcomes. The researchers then identified the prevalent features of the most effective professional development programs for teachers (Darling-Hammond, Hylar, Gardner, & Espinoza, 2017).

Of these prevalent features, the advisory committee focused on four in particular: a focus on content, support for collaboration, provision of feedback and reflection, and personalized coaching and support. Again, these are features that make professional development effective regardless of whether we are preparing teachers for in-person, hybrid, or virtual instruction. Here is a closer look at these four features.

- **A focus on content.** In general, research suggests that the most effective professional development programs focused on how to teach specific content and how students learn that content, in conjunction with the materials that are being used in the classroom (Lynch, Hill, Gonzalez, & Pollard, 2019). This type of professional development provides teachers the opportunity to study their students' work, test out use of the curriculum materials with their students, and discuss the impact of a particular pedagogical approach on student learning in the content area. In this way, discipline-specific, content-focused professional development supports teaching and learning within the classroom context (whether physical or virtual), as opposed to generic professional development delivered externally or divorced from teachers' school or district contexts (Darling-Hammond, Hylar, Gardner, & Espinoza, 2017).
- **Support for collaboration.** There is a positive association between teachers participating in professional development together with their co-workers—as well as teacher's participation during curriculum implementation meetings—and increased student achievement. These findings suggest the importance of teachers having opportunities to discuss instructional innovations with colleagues and address issues that arise when implementing new instructional approaches (Lynch, Hill, Gonzalez, & Pollard, 2019; Penuel, Sun, Frank, & Gallagher, 2012; Darling-Hammond & McLaughlin, 1995). This may be even more important in a virtual context, as even seasoned teachers are dealing with unprecedented instructional challenges. Moreover, this is consistent with the idea that formal or informal learning communities among teachers can act as powerful mechanisms for teacher growth and development (Desimone, 2009).
- **Feedback and reflection.** Professional development models associated with gains in student learning are intentional about building in time for reflection and feedback, ensuring that teachers can think about, receive input on, and make changes to their practice. This often includes opportunities to share both positive and constructive

reactions to lesson plans, demonstration lessons, or videos of instruction (Darling-Hammond, Hyler, Gardner, & Espinoza, 2017). While feedback and reflection are two distinct practices, they work together to help teachers become proficient with practices that they may have learned about or seen modeled during professional development (Darling-Hammond, Hyler, Gardner, & Espinoza, 2017). Specifically, teachers self-reported that the most effective feedback provides a clear vision of success and an accurate assessment of their strengths and challenges in meeting these expectations (TNTP, 2015). In this way, job-embedded feedback and reflection are likely to improve the chances of success for instructional reforms, as instructional practices that are new and unfamiliar are more likely to be accepted and retained when they are perceived as increasing one's competence and effectiveness (Guskey, 2000).

- **Personalized coaching and support.** A recent meta-analysis of 44 studies of teacher coaching programs found that coaching had a larger effect size on instructional change than previously reported effect sizes measuring the differences between novice and experienced teachers—traditionally one of the largest factors determining teacher effectiveness. These authors characterized effective coaching as individualized (one-on-one), intensive (at least every couple of weeks), sustained (throughout a semester or year), and focused (deliberate practice on specific skills), with an observation and feedback cycle (Kraft, Blazer, & Hogan, 2017). Additionally, effective coaches were experts in their field who could model research-based practices in the classroom and could enhance teachers' knowledge and instructional skills through cycles of instructional planning, discussion, job-embedded reflection and feedback, supporting teachers' efforts to incorporate these practices in their own classrooms. To this end, coaches need an understanding of adult learning theory, which differs from how children learn, as teachers wrestle with changes in practice. To effectively support classroom teachers, they must challenge teachers' assumptions and provide continuous support as teachers make connections between new learning, their existing knowledge, and previous experience (Merriam, 2008). It is therefore important that coaches respect teachers' existing knowledge and experience and provide meaningful feedback (Paige, 2002; Hurd, 2002; Creane, 2002, Griffiths, 2005).

It is also important to note that while coaching was found to have a significant positive impact, this impact was typically not evident after the first year of placement (Campbell & Malkus, 2011), underscoring the point that coaching should be designed and implemented as a long-term investment.

Additionally, the research found that the most effective professional development programming incorporates active learning (Desimone, 2009; Garet et al., 2001; Loucks-Horsley et al., 1998), uses models of effective practice (Wilson, Rozelle, & Mikeska, 2011), and is of sustained duration (Darling-Hammond, Hyler, Gardner, & Espinoza, 2017; Desimone, 2009). Moreover, the research suggests that it is through the combined power of multiple features that professional development best achieves its goals of changing practice and improving instructional outcomes.

Part II: Preconditions and Design Principles

Preconditions for Implementing High Quality Professional Development

Regardless of the management approach of a system, whether highly centralized or more tilted toward site-based management and autonomy, the district has a vital role to play in providing and overseeing professional development for instructional staff and leaders at both the central office and school levels. Perhaps nowhere is this district role clearer than when we look at the preconditions necessary for building and sustaining a program of high-quality professional learning. Preconditions, for the purposes of this framework, can be defined as a cross-cutting set of organizational structures, actions, and commitments that should ideally be in place in order to support the development and implementation of high-quality professional development.

In particular, professional development programming has the best chance of improving instruction systemwide if —

- The district has defined and consistently communicated a **strong, unifying vision** for high-quality school and classroom practice built on rigorous college- and career-readiness standards, inclusivity, and high expectations for all students. This vision reflects a district’s commitment to and advocacy for instructional equity and excellence.
- The district has conducted a comprehensive **assessment of the professional development needs of all teachers, as well as instructional support staff and leaders**. This needs assessment was conducted as a collaborative, inclusive process that leveraged the expertise and perspectives of a diverse range of educators, and took into account factors such as observation data, student work and achievement data, **the technology and resources necessary and available to deliver quality instruction in an in-person, virtual, or hybrid learning environment**. It is essential that professional development planning start from this assessment of school, teacher, and student needs, rather than being driven by a revolving door of new initiatives or partnerships.
- Based on this needs assessment and the district’s instructional vision, the district has developed a **comprehensive, multi-tiered professional development plan** and has allocated the resources necessary to support and evaluate the work over multiple school years. This includes providing educators with the technology and tools necessary to support distance learning.
- The district has established a **culture of data-driven instruction**, meaning that there is an expectation that student progress data—including data from formative assessments—are regularly and systematically collected, analyzed, and used to inform decision-making in areas such as the professional development needs of teachers and school leaders.
- The district has established a **cultural norm of openness and collaboration in service of continuous improvement**. This may mean an open-door policy where teachers

regularly welcome others into their classroom—whether physical or virtual—for nonevaluative peer observation, discussion, and feedback to improve instructional practice. It may also mean that the district has created structures such as professional learning communities and common planning time to provide opportunities for ongoing collaborative work and reflection—even in a virtual environment—to sustain and deepen whatever learning occurs in professional development.

- If applicable, the district has negotiated with the local teachers’ union to carve out a **sufficient amount of time throughout the school year** for the professional development, coaching, and focused collaboration of school-based personnel.
- District leadership is a highly vocal and visible champion of diversity and equity, continuously working from the top to engage staff at all levels and across central office departments, staff, and schools build a culture of **shared accountability for student achievement**. In particular, the district has communicated, reinforced, and acted on a message of collective responsibility for the academic outcomes of English language learners and students with disabilities.
- The district has adopted structures and policies that break down siloes and promote **strong working relationships among central office departments in support of schools**. In our extensive work with school districts, we have observed that engaging staff across departments—not only various content areas and levels such as elementary and secondary, but departments that oversee English Language Learner programs, special education, gifted and talented programs, career and technical education, etc.—is essential in planning and implementing professional development that is consistent and meets the full range of schools’ instructional needs.

An additional consideration that is both a design feature and a precondition is the need for districts to ensure broad-based teacher and leader buy-in for professional development programming. This is often one of the key reasons that districts involve representative samples or working groups of teachers, principals, principal supervisors, and other school-based instructional staff in the design, review, and selection of professional development programs or approaches. Another critical strategy for boosting understanding and support is clear, consistent communication with schools about the rationale and purpose of professional development offerings. Ideally, teachers and leaders need to not only understand the changes in instructional approach and expectations that the district is trying to reinforce with professional development (the “what”), but *why* instructional approaches need to change—i.e., the additional value that new approaches will offer that instructional standards of the past did not.

A district can also build trust and support among teachers and leaders by ensuring that professional development is aligned not only to the instructional vision and standards of a school system, but to the assessments and the evaluation of teachers and leaders. If teachers feel that professional development is irrelevant or disconnected to the challenges they face in their everyday work, the content standards they are being asked to meet, or how they are evaluated, then that professional development has little hope of changing classroom instruction in a meaningful or sustainable way.

Principles for the Design and Implementation of High-Quality Professional Development

Based on our exploration of the research and lessons from the field, as well as the process of articulating a definition of and preconditions for high-quality professional development, we can now point to a core set of design features and principles. These principles touch on the “why” (*What is the purpose of professional development? How does it serve students, teachers, leaders, and the district as a whole?*), the “what” (*What knowledge or skills should professional development provide or focus on?*), the “who” (*Who are we targeting? Who should have access to professional learning opportunities, and who should be deployed to provide and reinforce this professional learning?*), and the “how” (*How should professional development be structured, delivered, and evaluated to best improve instructional outcomes?*). Some of these principles reflect the kinds of preparation all instructional staff and leaders require to be effective in their roles, while other features and principles are more tightly focused on professional development for classroom teachers. While we don’t delve into the details of how to translate these principles into practice until the next section, it is helpful to start out with a common set of beliefs about how professional development should be conceived, designed, and implemented in order to effectively change teacher practice and improve instructional outcomes.

The “Why”

- To begin, high quality professional development should be designed and implemented to **address both current and enduring patterns of student and teacher assets and needs** across the district. Starting from an assessment of assets and needs is a very different proposition from the initiative- or vendor-led approach to professional development planning in many districts. The process of designing or selecting professional development should therefore start from an understanding of both immediate needs arising from new modes of virtual or hybrid instruction, as well as what a district wants to achieve or change in the long term through a shift in instruction. The district should then work backward to define what kind of professional development can get them there.
- Professional development should be transparent around **change as the primary goal**. Even aside from the need to master new technologies and modes of instruction, the purpose of professional development should be to change and enhance the way teachers currently teach and have been trained to teach, sometimes over the course of long careers, to improve student achievement.
- Professional development should serve as the **mechanism for translating a district’s instructional vision and standards into practice**. To this end, professional development should be aligned to a district’s curriculum and evaluation system and build the capacity of teachers and schools to measurably improve student outcomes. It is only through the seamless integration of these components that professional development will earn the trust and support of teachers and administrators.
- Professional development should also reflect a district’s appreciation and respect for diversity, allowing a school system to deliver on its commitment to **creating learning**

environments that are inclusive, culturally responsive, and equipped to meet the needs of all students, especially those that have historically been marginalized.

- As a forum for collective growth and learning, professional development should **instill all teachers and staff with a sense of community built on mutual respect, foster collaboration, and promote shared ownership of the work** at the grade, school, and even district level. While personalized coaching and support is critical to address specific, individual needs, collective professional learning is where districts create impact and change on a larger scale.

The “What”

- In order to build buy-in and widespread implementation, it is critical that professional learning address high-leverage approaches to meeting **the daily demands of instruction or school leadership** rather than focusing solely on frameworks or theory. This connection to reality is especially critical when this reality involves the new demands of virtual or hybrid instruction. Teachers—and those that support and oversee them—require real-time support and guidance on how to adjust their instruction and **effectively engage students in learning**. This involves a whole host of new skills and responsibilities, including knowing how to use technology and online learning platforms to manage a virtual classroom, how to identify signs of student distress or disengagement and rebuild a connection with them through outreach and social-emotional support, and how to strategically involve parents or caregivers, who have become not only stakeholders but partners in the work of ensuring student progress.
- However, professional development should avoid falling into the trap of simply covering teaching strategies or “tips and tricks,” particularly for students with unique needs. As much as ever, professional development should focus on **building teachers’ knowledge of content, how children learn, and Tier 1 instruction**, ensuring that they are prepared to advance deep conceptual learning among students with multi-faceted needs.
- Professional development should also provide teachers with the skills necessary to **effectively select and employ interventions for struggling students and students with special needs in service of grade-level instruction**. Of course, in any school or district there will need to be a corps of teachers and support staff with specialized knowledge and skills for supporting students with special needs. This doesn’t take away from the fact that *all* teachers need to be prepared to support all of the children sitting in—or logging onto—their classes.
- Moreover, the district should ensure that **professional development for specialized instructors or support staff is fully aligned to district instructional standards** and not approached as an afterthought or an undertaking outside of its primary educational mission. Specialized training should be fully incorporated into the planning and implementation of districtwide professional development, sending the message that these teachers, and the children they support, are a core priority for the district.
- Professional development should alert teachers in advance to patterns of student challenge with specific units or lessons, and will need to equip teachers to **address unfinished learning without compromising student access to grade-level content and instructional rigor**. To avoid widespread remediation, professional development will need to instill the

message—and provide teachers and leaders with the skills— to employ just-in-time instruction, prioritize content and learning, focus on the depth of instruction rather than the pace at which topics are covered, identify gaps in knowledge without misusing or misinterpreting standardized testing, and maintain the inclusion of all learners. For more information, please see [Addressing Unfinished Learning After COVID-19 School Closures](#) and [Supporting English Language Learners in the COVID-19 Crisis](#).

- Professional development should **inform teachers about the instructional resources available to them and provide the guidance necessary to effectively use these resources to support student learning**. Particularly if teachers are engaged in distance learning and have limited interaction with peers or administrators, they might not be aware or know how to access, select, or use the wealth of materials, guides, and videos that many districts have developed to assist them.
- To the extent possible, professional development should be **data- and evidence-driven, highlighting best practices** from the field. While there is limited data currently on how to best support and improve online and hybrid instruction for K-12 students, districts should connect with their peers in other school districts to stay informed about the promising professional development programming being developed and delivered across the country, as well as other promising practices in the shared effort to strengthen instruction during school closures and beyond.
- Professional development should **instill inclusive, equitable practices**. Whether delivering instruction to a class of diverse learners or employing small group instruction, teachers should ensure that students who are struggling are not segregated or set aside. These students, who may include English learners, students with disabilities, or students disproportionately affected by school closures or the COVID-19 pandemic, need access to the core curriculum and the opportunity to interact and learn alongside their peers.
- To this end, professional development should **address teachers' beliefs and biases concerning the capacity of students with specialized learning needs** to meet grade-level standards. Ultimately, student success is driven not only by the quality of instruction but by high expectations and a shared belief in the potential of all students.
- Professional development should **address any weaknesses or gaps in the district's instructional materials** to enable teachers to identify and use high-quality resources to provide comprehensive instruction to their students.
- Professional development should also provide teachers with guidance and models for **addressing the learning needs of more advanced students**.
- Professional development should be designed to **enrich reflection and decision-making** about instructional practice. For teachers and coaches, this might mean nurturing the aptitude and insight they need to assess student needs and the progression of student thinking to tailor instruction in innovative ways. This will help to ensure that all students are engaged in rigorous learning and meeting grade-level standards. It should also prepare teachers to make informed decisions in the selection or development of instructional materials aligned to college-and career-readiness standards. For school leaders, professional development should hone their role as decisionmakers on a schoolwide basis, providing them with knowledge on what to look for when observing physical or virtual classes, how to identify quality

instruction and areas in need of improvement, how to assess the level of student work samples, and how to be strategic and intentional in addressing these needs in their professional development planning.

- Professional development for both teachers and leaders should provide the skills necessary to **analyze and apply data** on student needs and progress to drive instruction and planning. As mentioned above, in the aftermath of school closures and interrupted learning due to the pandemic, the ability to appropriately interpret student data is more critical than ever. The danger of misusing assessment data is discussed in more detail in [Unfinished Learning After COVID-19 School Closures](#) and [Supporting English Language Learners in the COVID-19 Crisis](#). In sum, teachers and administrators should be careful in their use of standardized testing data, relying instead on instruction as a means of identifying and attending to student learning needs.

The “Who”

- Professional learning opportunities should be **widely accessible** to the entirety of the instructional workforce. This includes teachers providing instruction in English language development and specialists providing services and instruction to struggling students and students with disabilities, as well as paraprofessionals, long-term substitute teachers, and any other educator that is teaching students. It also includes coaches, instructional specialists, school psychologists and counselors, nurses, clinicians such as physical therapists, and school-based administrators and leaders such as assistant principals, principals, and principal supervisors. Shared professional learning that reinforces a district’s values and priorities is a vital step the district should take to instill a unified vision for instruction.
- The district should **provide parents and caregivers with real-time information and access to the guidance and resources they need to support student learning**, particularly during remote and hybrid instruction. This includes information on class schedules, tutorials on the use of technology and learning platforms, information on how to contact school or district personnel, and links to supplemental resources and materials to support or advance out-of-school student learning.
- The district should ensure that, in addition to teachers, **school leaders and instructional support staff understand the purpose and rationale** behind professional development so that they are prepared to support teachers and advance change at the school level.
- While professional development should be designed to nurture educator capacity in a systematic, intentional way over the course of a given school year (and beyond), a comprehensive professional development plan also needs to **provide new teachers and administrators with the just-in-time training** they need to support implementation of the district’s instructional vision, curriculum, and standards from their first day.
- Professional development should be provided by practitioners or experts who are equipped with **deep content and pedagogical knowledge** as well as expertise in **leading adult learning**. Where train-the-trainer models are employed, districts should ensure that the individuals tapped to relay professional development at the school level not only have the necessary content proficiency and pedagogical content knowledge, but are sufficiently prepared to support the learning of their peers.

- Coaches or other instructional support staff should be deployed to provide **hands-on, targeted support and feedback**. Staff in these roles should be carefully vetted, consistent in their messaging and methods, and receive the professional development *they* need to continuously hone and refine their own practice to help teachers and leaders grow in their practice.

The “How”

- Professional development needs to be **differentiated** to meet the needs of teachers and leaders with different skill sets and levels, and at different points in their career. This should not come at the cost of rigor or alignment to district instructional standards, but rather reflect the unique—and evolving—professional learning needs of educators, particularly as they confront the new challenges of mastering remote and hybrid instruction.
- Professional development should be designed to **develop progressively more sophisticated knowledge and skills over time**. This not only serves to develop teacher capacity, but also to **keep talented teachers in the field** by ensuring that they continue to learn and grow in their profession and in their ability to adapt their planning, instruction, and assessment practices in multiple learning environments.
- Professional development should be provided and reinforced through a **tiered system of support**. In addition to professional development offered at the district level, there should be professional learning opportunities and **follow-up support** provided at the zone and school levels through professional learning communities (PLCs); regular zone, school, and department meetings; common planning time; and personalized coaching.
- Professional development should be approached in a manner that is **respectful of teachers and school leaders as professionals**. It is clear that when districts try to invest in “teacher proof” training/materials—such as overly scripted instructional materials—it is the antithesis of a meaningful or effective investment in teacher capacity and professional growth.
- Professional development should not be a one-time occurrence, but rather a carefully orchestrated, **ongoing process of learning**. The design and implementation of professional learning should be driven by the recognition of the time necessary for deep and lasting changes to take root. Authentic learning requires that teachers and leaders have sequenced and intentional opportunities to **reflect on their practice** and develop the agency to change the lives of students.
- Professional development should involve **job-embedded work**, with **actionable, real-time feedback and immediate applicability** in a classroom, school site, or distance learning environment. To further ensure buy-in, participants in professional development should be familiar with the theory of action or rationale for the district taking this particular instructional approach over another.
- Professional development should promote the **active engagement** of each participant. Traditional “show and tell” or “sit and get” forms of imparting information were always flawed, and are even more inadequate during the current crisis. Providing teachers with meaningful opportunities to interact with their peers and mentors and to reflect on their practice is vital at a time when teachers or staff may feel isolated or cut off from the school community due to school closures.
- The level of intensity of professional learning should be significant enough to **promote the productive struggle of teachers and leaders** as they work through problems of practice. It

is important that participants are not only challenged but supported in the process of grappling with new approaches and concepts in multiple learning environments.

- In practice, this requires the **cross-functional coordination** of various central office departments and staff—including principal supervisors—in planning and implementing professional learning opportunities that not only equip teachers and other school-based staff with the necessary knowledge and skills, but that create a culture of shared ownership for the outcomes of all students.
- **Evaluation should be a foundational consideration** in the design and implementation of professional development. This means evaluation should be addressed from the outset, not as an afterthought. Evaluation metrics should track both what is meaningful in terms of adult and student outcomes, and what can be tied to professional development programming.
- Districts should also consider the time it will take for change to take root and **commit to sticking with the professional development plan** for a sufficient amount of time to gauge its full impact, even if results are not immediately evident.
- At the same time, the district should collect and incorporate **feedback from users** to leverage teacher and leader perspectives and expertise and effectively address any unforeseen design flaws or challenges that arise in the implementation of professional development.
- **Partnerships with external providers** of professional development should be carefully vetted to ensure that they **build—rather than diminish—internal district capacity**. Such partnerships should be both initially and regularly assessed for their impact on teacher practice and student achievement, as well as their alignment to district priorities and sustainability over time.

Part III: District Exemplars—UNDER CONSTRUCTION

Part IV: Features Rubric—UNDER CONSTRUCTION

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OMAHA SPECIAL ED DATA REVIEW

SPECIAL EDUCATION DATA REVIEW
for the
Omaha Public Schools
Submitted to the Board of Education
of the
Omaha Public Schools
by the
Strategic Support Team
of the
Council of the Great City Schools
2020



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ACKNOWLEDGEMENTS

First, we thank Dr. Cheryl Logan, the school district’s superintendent. 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.

Second, we thank the Omaha Public Schools’ (OPS) board of education, who approved having this review done. We hope this report meets your expectations and will help improve special education services across the school system.

Third, we thank staff members of the school district who contributed to this effort, particularly Melissa Comine, Chief Academic Officer, and Kara Saldierna, Director of Special Education Curriculum and Instruction Support, who ensured that data and documents requested by the team were provided. Most people have no idea how much time and effort are 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, especially as a world-wide pandemic has affected our nation and OPS. Thank you.

Finally, I thank Julie Wright Halbert, the Council’s legislative counsel, and Sue Gamm, a nationally known expert in special education and long-time Council consultant, 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

INTRODUCTION

Omaha Public Schools (OPS) Superintendent Dr. Cheryl Logan asked the Council of the Great City Schools (CGCS) to review the district's services for students with disabilities and provide recommendations to improve teaching and learning. It was clear that the superintendent and her staff have a strong desire to improve student outcomes for this group of students and all students generally.

Prior to the Council's review, the COVID-19 virus began spreading across the country and it was no longer safe to travel and conduct an in-person visit, which would have included interviews with scores of individuals and groups. Because of the difficulties involved in coordinating interviews and focus groups remotely with so many people, and because of the school district's immediate need to provide high quality distance learning for students, OPS representatives and the Council's Strategic Support Team (Council team) decided to conduct the review by focusing on student and personnel data that could be made available electronically. As this report shows, such data provide a wealth of information that the Council team could use to formulate study questions and develop recommendations for improving teaching and learning for students with disabilities.

OPS is the largest school district in the state of Nebraska. With over 53,000 students from prekindergarten through 12th grade educated in more than 100 elementary and secondary schools, the district has a diverse student population. Students from the three most common races/ethnicities comprise 87 percent of district enrollment (37 percent Hispanic, 26 percent White, and 24 percent Black). Students with disabilities constitute 19 percent of enrollment and English learners constitute some 18 percent of student enrollment.

Background

Three school districts (prekindergarten through high school) are in Omaha along with OPS.

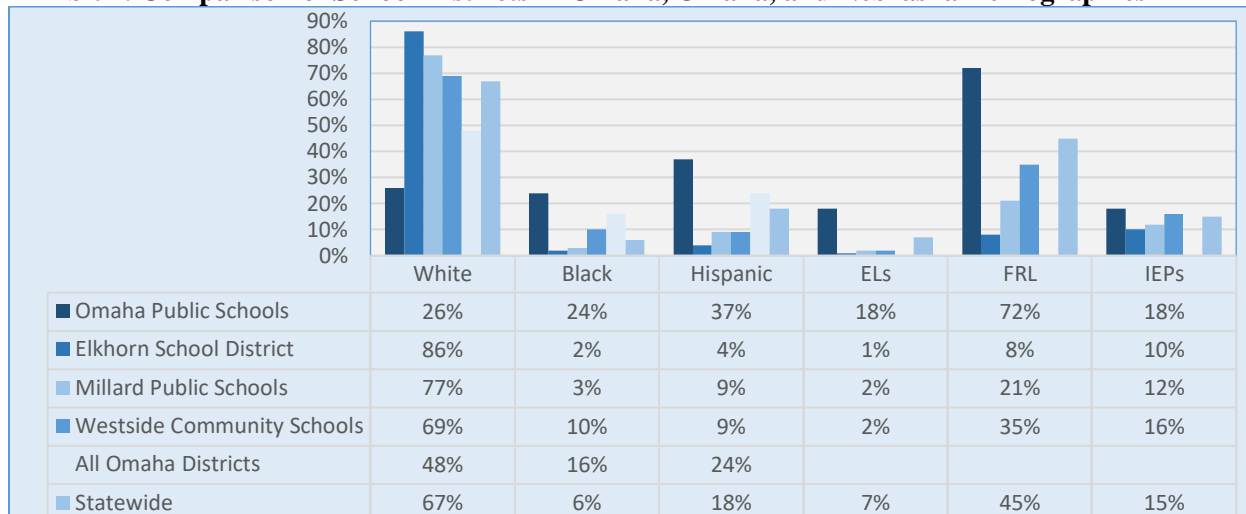
- ***Elkhorn School District.*** Located on the west edge of Omaha, the district has an enrollment of almost 10,000 students.
- ***Millard Public School.*** Located in southwest Omaha, the district has an enrollment of some 24,000 students.
- ***Westside Community Schools.*** Located in the western portion of Omaha, the district has an enrollment of some 5,930 students.

Like other CGCS member districts located near other districts, OPS is much more diverse than Elkhorn, Millard, Westside, and the state –(See Exhibit 1.)

- ***Students of Color.*** OPS's proportion of Black and Hispanic students (61 percent) is much larger than the three districts' and state's (6 percent, 12 percent, 19 percent, and 23 percent, respectively)
- ***English Learners.*** A much larger proportion of OPS students are English learners (18 percent), than the district and state (1 percent, 2 percent, 2 percent, and 7 percent, respectively).

- **Free or Reduced Lunch.** A much larger proportion of OPS students receive a free or reduced lunch (72 percent), compared to the three districts and the state (8 percent, 21 percent, 35 percent, and 45 percent).
- **IEPs.** A larger proportion of OPS students have individualized education programs (IEPs) (18 percent), compared to the three districts and the state (10 percent, 12 percent, 16 percent, and 15 percent).

Exhibit 1. Comparison of School Districts in Omaha, Omaha, and Nebraska Demographics



These comparisons help to provide context for the challenges facing OPS, its students, and families. Furthermore, news coverage indicates that persons of color in Douglas County are being disproportionately affected by the COVID-19 virus.¹ In addition, a new collaborative study between Creighton University’s Social Science Data Lab and Family Housing Services correlates evictions with higher rates of COVID-19 infection.² Evictions “skewed east, as do minority populations, which make up 73 percent of Douglas County’s COVID-19 infections while representing about a third of its population.”³

Organization of CGCS Report

The Council team’s data review and analysis are organized around the following areas.

- I. Disability Demographics
- II. Achievement, Postsecondary Transition, and Suspensions
- III. Educational Environments of Learning

¹ Retrieved from https://omaha.com/livewellnebraska/aclu-others-seek-coronavirus-data-on-race-ethnicity-in-nebraska/article_e9681034-64c4-56c8-bd6b-9363e233c80c.html.

² Retrieved from <https://storymaps.arcgis.com/stories/b839374e031d4ecfa21cb1fbaebbf31e>.

³ Retrieved from <https://thereader.com/news/evictions-and-race-in-omaha-new-study-draws-a-connection-offers-solutions>.

IV. Staffing Support and IDEA Performance/Compliance Outcomes

Each area contains data that reflect OPS' successes and opportunities for improvement, along with associated study questions. A series of recommendations is provided at the end of the report, along with a matrix showing how the recommendations intersect in various ways to support implementation. This information is followed by five appendices:

- Appendix A provides the full list of the Council team's study questions for further discussion.
- Appendix B compares incidence rates and staffing ratios in 79 major school systems across the country.
- Appendix C lists data and documents reviewed by the team.
- Appendix D presents brief biographical sketches of team members.
- Appendix E 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 22 years.

I. DISABILITY DEMOGRAPHICS

This section presents demographic data on OPS students with individualized education programs (IEPs).⁴ When available, we compared data on district students with those at the state and national levels and with other urban school districts across the country. In addition, data were analyzed by grade, race/ethnicity, and English learner (EL) status, and among students with Section 504 plans.

Disability Prevalence Rates

In this subsection, we compare percentages of OPS students receiving special education to those at the state and national levels. Also, incidence rates were disaggregated for children ages three through five years, and for school-age students by disability area, grade, race/ethnicity, and English learner status.⁵ This information helps to determine the extent to which school practices produce outcomes that are like or different from state and national data. Although OPS rates that are different from other averages are not inherently problematic, they provide a basis for further inquiry and follow-up action.

Overall Proportion of Students with IEPs

In 2019-20, OPS enrolled 53,152 students in grades PK through 12. Of this number, 10,250 students (19 percent) had IEPs. The district's percentage was larger than the state and nation (14 percent and 15.6 percent, respectively).⁶

Students in Half Day and Full-Day Prekindergarten, and Kindergarten

Of the 6,822 children receiving education in half or full day pre-kindergarten (PK), or kindergarten, 23 percent (1,564) received special education. Data in Exhibit 1a show the composition of young children with IEPs by disability area for OPS, the state, and the nation. Several OPS disability areas are noteworthy. In all four disability areas that comprised at least 4 percent of the special education group, OPS percentages were either larger or smaller than the state or nation--or both. Especially notable was the relatively large number of PK students with a hearing impairment (46), which comprised 5.44 percent of all PK students with IEPs.

- **DD.** Both OPS and state rates in the area of developmental disabilities (DD) were higher than the nation (60 percent, 57 percent, and 38 percent, respectively).

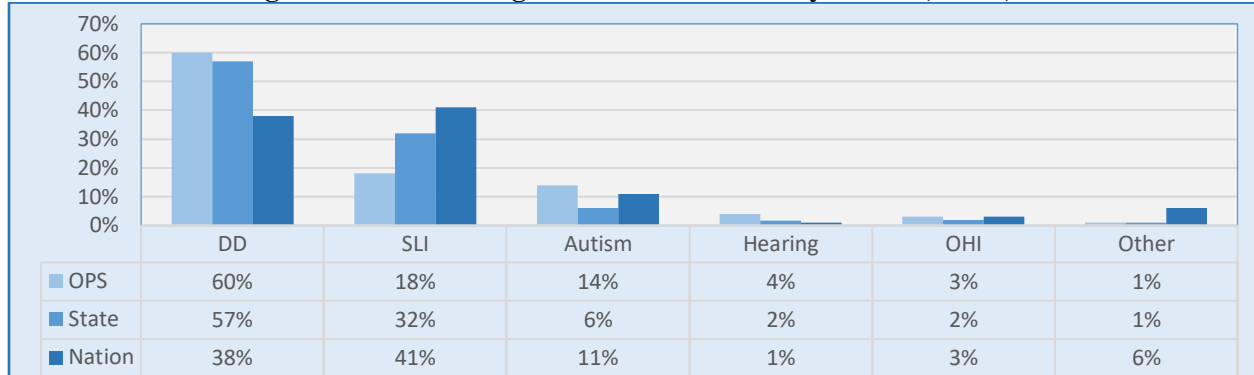
⁴ Students with IEPs are also referred to as students with disabilities. These data are limited to students with a disability under IDEA and does not include students with Section 504 plans. Also, the data does not include students who are gifted in the category of disability.

⁵ Unless otherwise stated, all OPS data were provided by the district to the Council team and are for the 2019-20 school year. State and national data is from 2018-19 and based on the U.S. Department of Education's IDEA Part B Child Count and Educational Environment database, updated Nov. 1, 2019, retrieved from <https://www2.ed.gov/programs/osepidea/618-data/static-tables/index.html>.

⁶ National Center for Education Statistic's The Condition of Education (May 2020), retrieved from https://nces.ed.gov/programs/coe/indicator_cgg.asp;

- **SLI.** OPS’s speech/language impairment rate (18 percent) was lower than the state (32 percent) and nation (41 percent).
- **Autism.** OPS’s autism rate (14 percent) was more like the nation’s 11 percent rate than the state’s 6 percent rate.
- **Hearing Impairment.** OPS’s rate of 4 percent was higher than the state’s 2 percent and nation’s 1 percent rates.

Exhibit 1a. Percentage of 3-5 Years of Age Students with IEPs by District, State, and Nation



Students 6 to 21 Years of Age

Data in exhibit 1b show the percentage of students (ages 6-21 years of age) in the district, state, and nation according to the six most common disability areas.⁷ These areas, which comprise about 95 percent of all students with IEPs, are specific learning disability (SLD), speech/language impairment (S/L), other health impairments (OHI), autism, emotional disturbance (ED), and intellectual disability (ID). Similarities and differences are described below.

Under IDEA, states may choose to use the category of developmental disabilities (DD) for children ages 3-9 years. Nebraska has chosen to end DD eligibility for children at the end of the school year in which they reach the age of eight. OPS and children statewide with DD in grades 1 through 3 (the last grade showing children with DD) each comprised 5 percent of students with IEPs, compared to 3 percent nationally. The variability of state-defined age ranges and state reliance on this category make it difficult to compare state and national data. Therefore, the Council team excluded the DD category from student totals for OPS, Nebraska, and the nation for data shown in exhibit 1b.

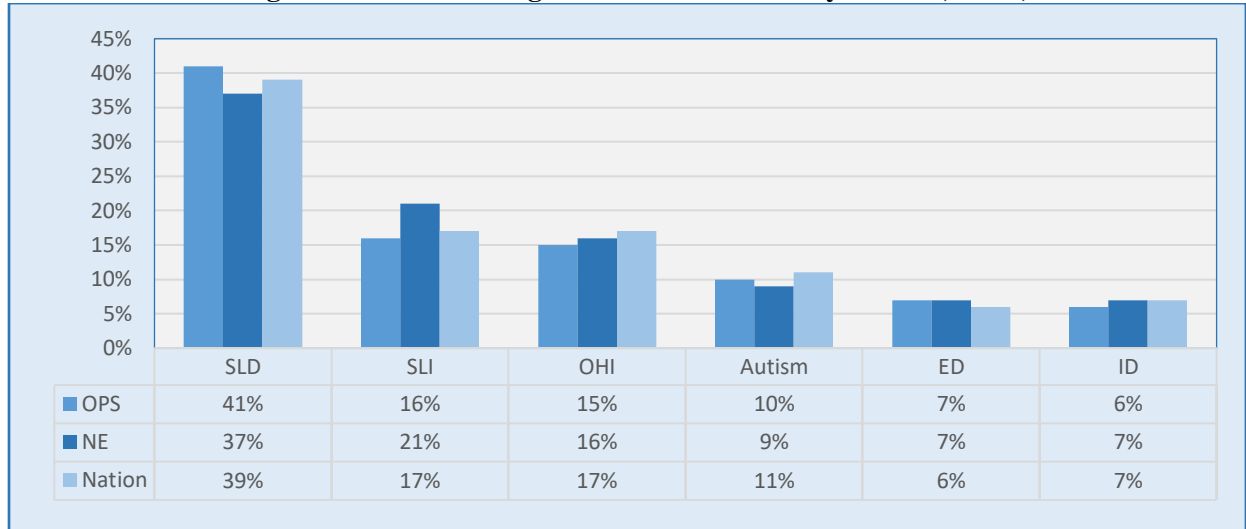
- **Similar OPS Rates to State.** OPS’s disability rates were like the state’s in the areas of OHI (15 percent, 16 percent, and 17 percent, respectively), autism (10 percent, 9 percent, and 11 percent, respectively), ED (7 percent for both OPS and the state, and 6 percent for the nation), and ID (6 percent for OPS and 7 percent for the state and nation).
- **Higher OPS Rates.** For SLD, OPS rates were higher than both state and national rates (41

⁷ For OPS, students in grades 1 through 12 were used for this calculation.

percent, 37 percent, and 39 percent, respectively),

- **Lower OPS Rates.** In the area of SLI the district rate was lower than state and national rates (6 percent for OPS and 7 percent for the state and nation).

Exhibit 1b. Percentage of 6-21 Years of Age Students with IEPs by District, State, and Nation

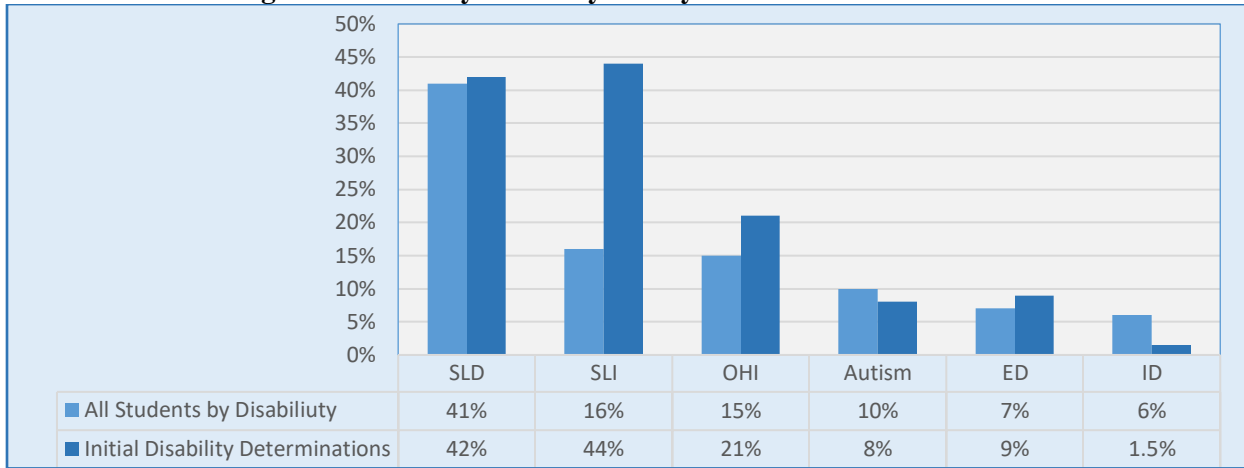


Percentage of Students by Disability Area and by Initial Evaluation Results

For students who received an initial evaluation during the 2018-19 school year, 83 percent were found to have a disability. Of these students, 16 percent were identified in the area of DD. Data in exhibit 1c compares disability rates shown in exhibit 1b, which exclude DD to better compare OPS with state/national figures and disability percentages associated with initial evaluations, which also exclude DD. The following are notable comparisons (initial to overall disability rates).

- **Intellectual Disability.** A much smaller percentage of students with disabilities were newly identified as ID (1.5 percent to 6 percent).
- **Speech/Language Impairment.** A much larger percentage of students with disabilities were newly identified as SLI (44 percent to 16 percent).
- **Specific Learning Disability.** New and overall rates for SLD were nearly identical (42 percent to 41 percent).

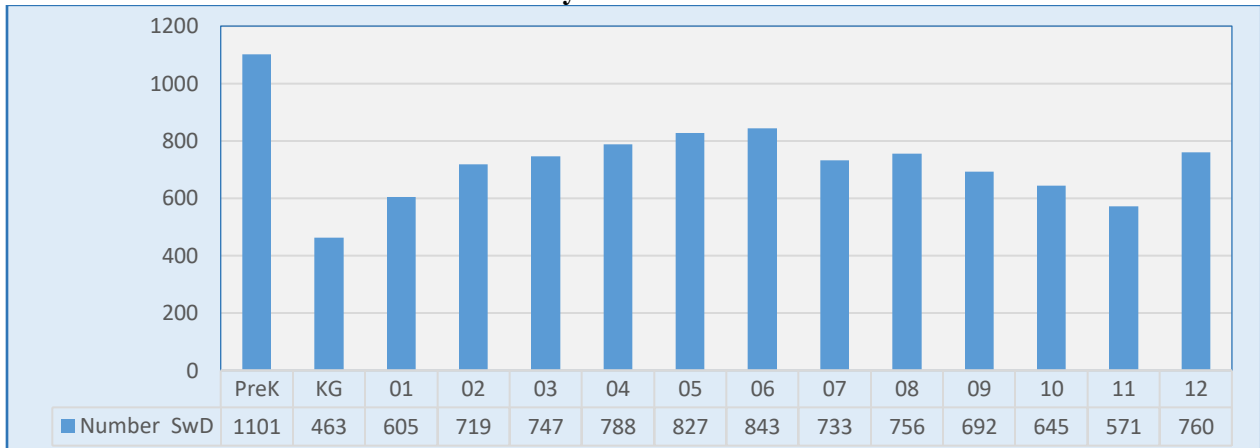
Exhibit 1c. Percentage of Students by Disability and by Initial Evaluation Results



Number of Students with IEPs by Grade

Exhibit 1d shows the number of OPS students with IEPs by grade. Generally, the number of students with IEPs at PK (1,101) is larger than at any other grade. These students include those in half-day and full day early childhood programs for children three to five years of age. Thereafter, the number jumped from kindergarten (463 students) to first grade (605 students), and gradually increased to a peak at sixth grade (843 students). From seventh to eleventh grades, the numbers decreased to 571 students. Although the number increased in twelfth grade (760), this figure includes students who remain in school until the age of 21 years for transition services.

Exhibit 1d. Number of Students with IEPs By Grade



Change in Disability Categories by Grade

The Council team also examined the number of students receiving special education in the seven most common disability areas by grade. These disabilities are developmental disability (DD), specific learning disability (SLD), other health impairment (OHI), autism, emotional disturbance (ED), and intellectual disability (ID). The OHI category is commonly used to include students with attention deficit hyperactivity disorder. These disability areas are comparatively

judgmental in nature and eligibility determinations tend to vary across schools, districts, and states. Low incidence disabilities are hearing impairments, visual impairments, multiple impairments, orthopedic impairment, and traumatic brain injury. These disability areas tend to be less judgmental and have evaluative components that rely on more scientific and objective measures. They each accounted for 2 percent or less of OPS’s students with disabilities.

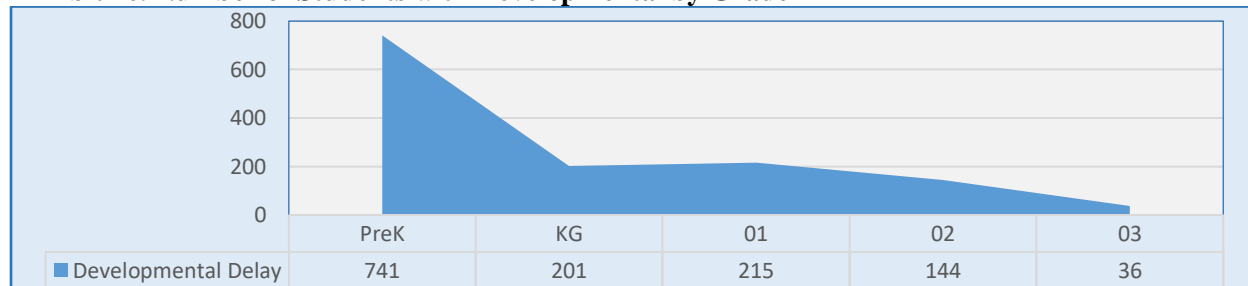
Patterns among students with common disabilities by grade are addressed in the areas listed below. Numbers for grade 12 are not included because they are inflated by students who remain in school until the age of 21 years for transition services and activities.

- Developmental disability;
- Specific learning disability and other health impaired; and
- Autism, emotional disturbance, and intellectual disability.

Developmental Disability

Exhibit 1e shows the number of OPS students with a developmental disability by grade. Beginning with 741 prekindergarten children, the numbers fell to 201 students in kindergarten, 144 in second grade and 36 in third grade. In Nebraska, a child may receive special education in this disability area only through the school year in which he or she reaches the age of eight.

Exhibit 1e. Number of Students with Developmental by Grade

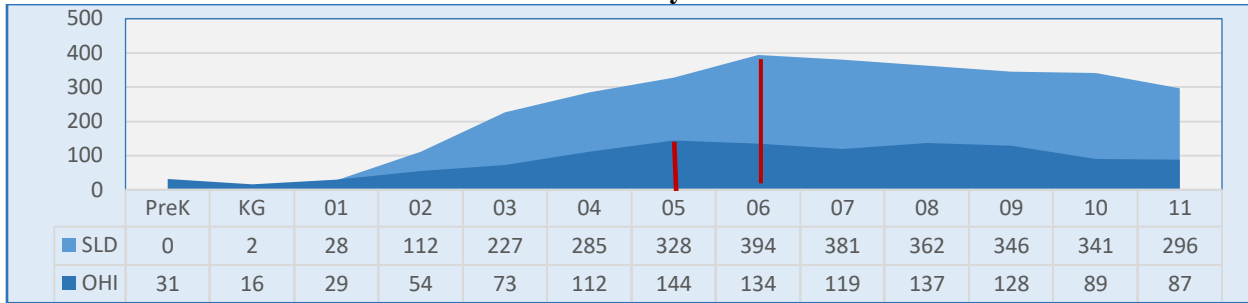


Specific Learning Disability and Other Health Impairment by Grade

Data in exhibit 1f show the numbers of students with SLD and OHI. In both areas, the numbers decreased between ninth and eleventh grades.

- **SLD.** Consistent with this disability area, the numbers of students with SLD were low from prekindergarten through first grade (zero to 28 students). The numbers began to spike at second grade (112 students), and they continued to increase thereafter until they peaked at sixth grade (394 students). Between seventh and eleventh grades the numbers steadily decreased to 296 students.
- **OHI.** The number of students with OHI also began at low levels in the elementary grades and peaked at fifth grade with 144 students. The number varied thereafter but peaked with 147 students in the eighth grade. In high school, the 128 figure fell significantly to 89 and 87 in tenth and eleventh grades, respectively.

Exhibit 1f. Number of Students with SLD and OHI by Grade

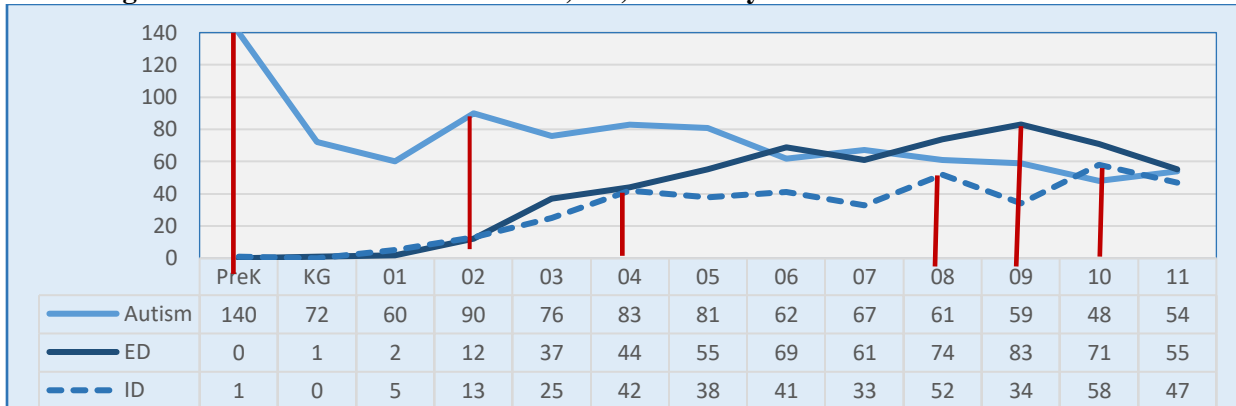


Autism, Emotional Disturbance, and Other Health Impairment

Exhibit 1g show numbers of students with autism, ED, and OHI by grade.

- **Autism.** Some 140 three and four-year-old children with autism were enrolled in early childhood programs. The number steadily increased from kindergarten (72 students) to a high of 90 students in second grade. The number generally decreased to 54 students in eleventh grade.
- **Emotional Disturbance.** Very few students were identified as having ED in prekindergarten through second grades (zero to 12 students). However, the number increased in third grade (37 students) and peaked at ninth grade (59 students). The number fell to 48 and 54 in tenth and eleventh grades, respectively.
- **Intellectual Disability.** As with ED, few students were classified with this disability in prekindergarten through second grades (1 to 13 students). However, the number peaked at fourth grade (42 students), eighth grade (52 students), and again at tenth grade (58 students). The number fell to 47 students at eleventh grade.

Exhibit 1g. Number of Students with Autism, ED, and ID by Grade



Follow-up Study Questions – Disability Prevalence

The composition of students by primary disabilities and grades helps to understand eligibility trends, plan follow-up activities to prepare for future increases (e.g., students with autism), and intervene where appropriate, e.g., growth of students with ED. Study questions for a

multidisciplinary group of OPS staff,⁸ which involve those overseeing general education, special education, and instruction for English learners, gifted learners, might include the following –

- Does OPS have a process in place for collecting and tracking data like those shown in exhibits 1a – 1g, and using cross-departmental personnel for review and follow-up action?
- What factors might contribute to disparities like the following:
 - Disability prevalence data for OPS young children that are larger/smaller than state/national data, e.g., speech/language impairment, autism, hearing impairment. (Exhibit 1a)
 - Variance in numbers of students with disabilities by grade (Exhibit 1d), and trends in the following:
 - Growth of specific learning disability category, which peaked at sixth grade. (Exhibit 1f)
 - Implications of high number of students with autism at the prekindergarten level as they continue in school. (Exhibit 1g)
 - Growth of students with emotional disturbance category, its peak at ninth grade, and sudden decrease in eleventh grade. (Exhibit 1g)
 - Growth of the intellectual disability category, especially at fourth, eighth, and tenth grades. (Exhibit 1g)
- Are there any concerns that in-home learning due to COVID-19 and decreased levels of performance/social emotional behavior might increase referrals for special education evaluations?
- Based on these and other analyses, are there educational and social/emotional strategies that OPS could employ/improve using a multi-tiered system of supports (MTSS) to help improve students' achievement/well-being and general education supports and reduce special education reliance?
- Does MTSS include measures to screen and identify students needing additional supports?
- Has OPS provided stakeholders sufficient and continued MTSS training, and has it identified high quality material/human resources at every school to provide additional supports students need for improvement?
- Does OPS have a comprehensive and user-friendly special education operations manual that is available on-line to all stakeholders and that is updated regularly? Is training provided to all stakeholders, including new personnel and periodic updated sessions that are targeted to meet participant needs.

⁸ The term “multidisciplinary group of persons” as used throughout this report is intended to involve a diverse group of administrators and others, including those identified above.

Disability Incidence by Race/Ethnicity and Gender

This subsection covers the extent to which OPS students from each of the most common racial/ethnic groups are proportionately identified as having a disability. The U.S. Department of Education includes two required indicators in each state performance plan (SPPs) to assess this issue. Indicators 9 and 10 concern disproportionate representation of all students with IEPs and the six most common disability areas. The six disability areas include specific learning disability (SLD), speech/language impairment (SLI), other health impairment (OHI), autism, emotional disturbance (ED), and intellectual disability (ID). In the SPP, a district with two years of a weighted risk ratio of 4.0 or higher, using cell and number sizes of 30 and more, would be required to review its policies, procedures, and practices to determine whether they are associated with disproportionality.

IDEA also requires states to identify school districts having significant disproportionality by race/ethnicity (among all students and by the six disability areas). According to federal regulations, states must now use a risk ratio measure (that is NOT weighted) with separate minimum race/ethnic student sizes (cell and number) for each disability and general education comparison group. Using a risk ratio measure, one racial/ethnic group is compared to all other racial/ethnic groups. This measure provides a user-friendly and easy to calculate tool to determine whether disproportionate data are of concern or significant. A risk ratio of “1” means that there is no likelihood that one group will have the measured characteristic compared to all other groups of students. A risk ratio of “2” means that one group is twice as likely to have the characteristic compared to all other groups of students. The higher the risk ratio, the higher the likelihood that one group of students will have the characteristic in question. IDEA regulations require states to use the risk ratio measure to determine significant disproportionality. The Council team uses the risk ratio threshold of “2” to reflect a concern that would trigger a proactive examination of underlying factors that could be producing the outcome in question and when activities that would reduce disproportionality should be considered.

Nebraska has not published its parameters for calculating a risk ratio for significant disproportionality, such as the maximum number and cell sizes or its threshold for determining when actions would be required. The state’s website, which the Council team reviewed several weeks prior to this report, posted outdated November 2015 significant disproportionality guidance that was based on a weighted risk ratio. The guidance included a link to the proposed significant disproportionality regulatory sections that are now final and in effect. When the Council team checked the NDE website again on August 3, 2020, the website no longer posted the outdated guidance but gave no additional information about the state’s parameters.

OPS’s FY2017 State Performance Plan/Annual Performance Report was published on January 20, 2019. For indicators 9 and 10, which concern disproportionate representation, NDE uses a weighted risk ratio of 3.0 or greater for three consecutive years for any racial/ethnic group

in which there are at least 30 students receiving special education.⁹ The department found that no Nebraska school district met this criterion for students with disabilities in total or among one of the six most common disability groups.¹⁰

All Students Receiving Special Education by Race/Ethnicity

Data in exhibit 1h compares the percentage of all students and students with disabilities by race/ethnicity. Hispanic (33 percent), Black (27 percent), and White (29 percent) students comprised the largest percentages of students with IEPs based on their respective total enrollments. Although the figures for Black and White students with disabilities exceeded the composition of their student enrollment, their respective four and three percentage point differences were not significant.

Exhibit 1h. Percentage of All Students and Students with IEPs by Race/Ethnicity

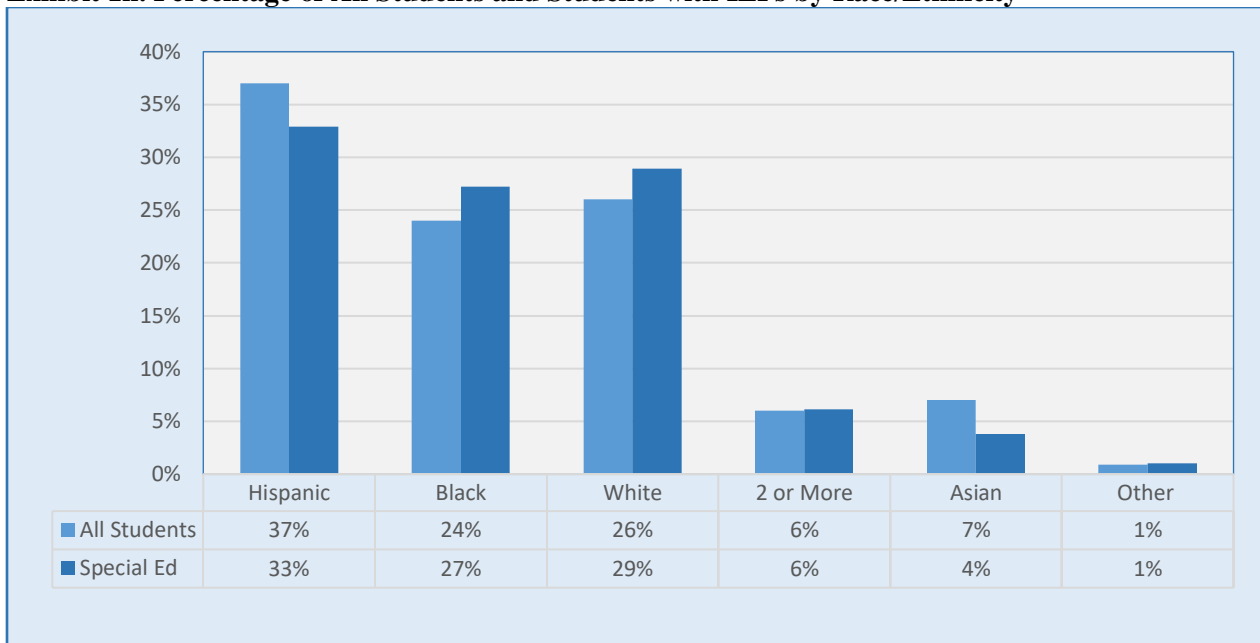
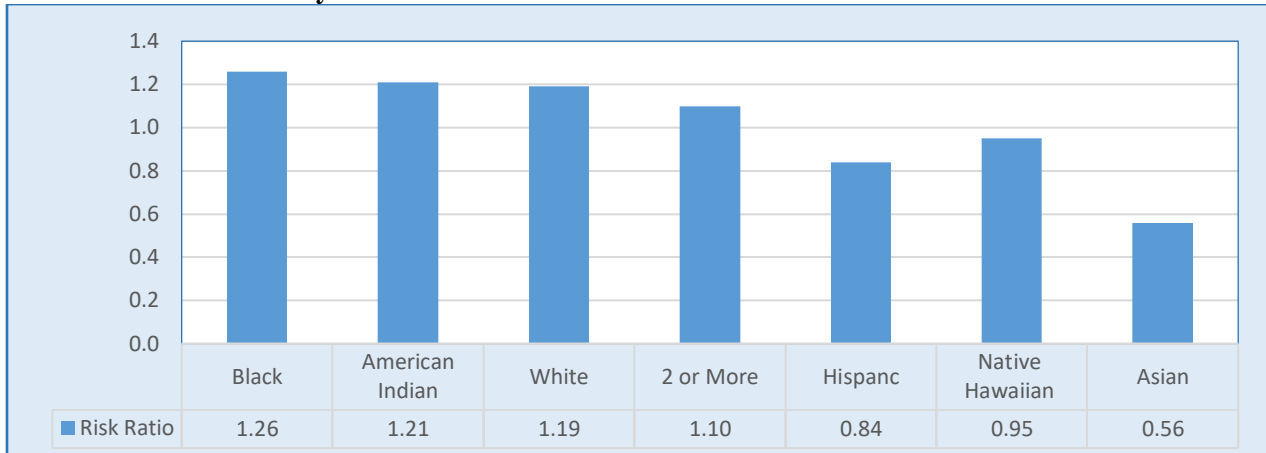


Exhibit 1i shows risk ratios for students with IEPs by race/ethnicity. No single racial/ethnic group of students had a risk ratio higher than 1.26. Risk ratios were highest for students who were black (1.26) and American Indian (1.21); however, these outcomes were far below the Council’s threshold of “2.” Risk ratios were lowest for Asian students (0.56).

⁹ The IDEA regulation does not require states to use the significant disproportionality measurement for state performance plans’ disproportionate representation analysis. Some states have chosen to use the same measure for both SPP analysis and significant disproportionality. This approach makes it much easier for district training and for calculating their own risk ratio measures prior to notice by the state educational agency.

¹⁰ Retrieved at <https://osep.grads360.org/#report/apr/2016B/Indicator10/CurrentData?state=CA&ispublic=true>

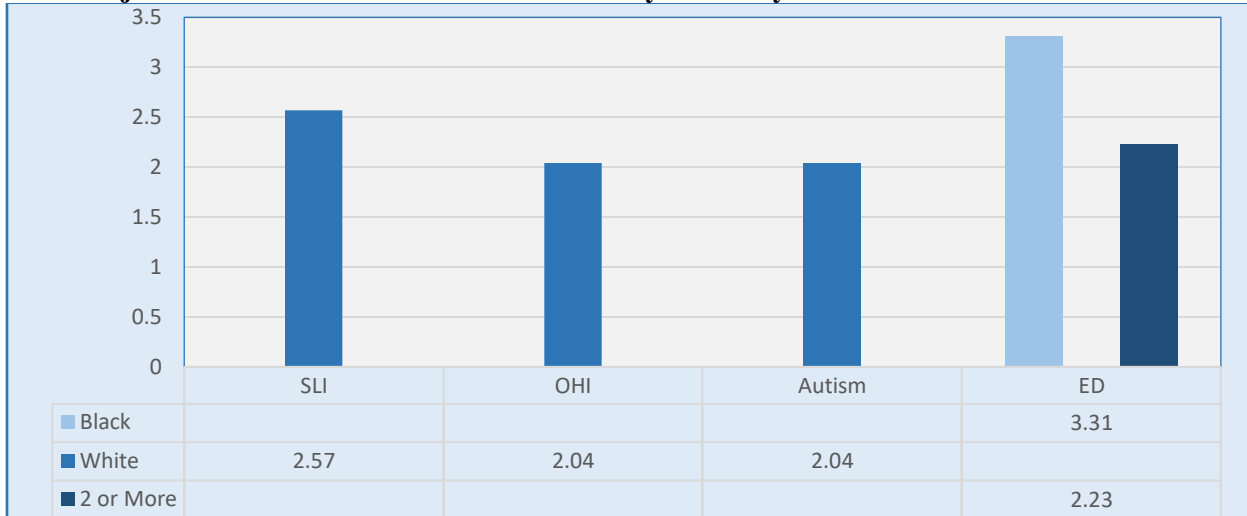
Exhibit 1i. Race/Ethnicity Risk Ratios



Most Common Disability Areas by Race/Ethnicity

Data in exhibit 1j show risk ratios that were at least 2.0. among Black, White, or Multiracial students with a disability involving a specific learning disability (SLI), other health impairment (OHI), autism, or emotional disturbance (ED). Black students had the largest risk ratio (3.31), which was in the area of ED. Multiracial students had a relatively large risk ratio of 2.23 in ED, as well. Risk ratios among white students exceeded the 2.0 threshold in the areas of SLI (2.57), OHI, (2.04) and autism (2.04).

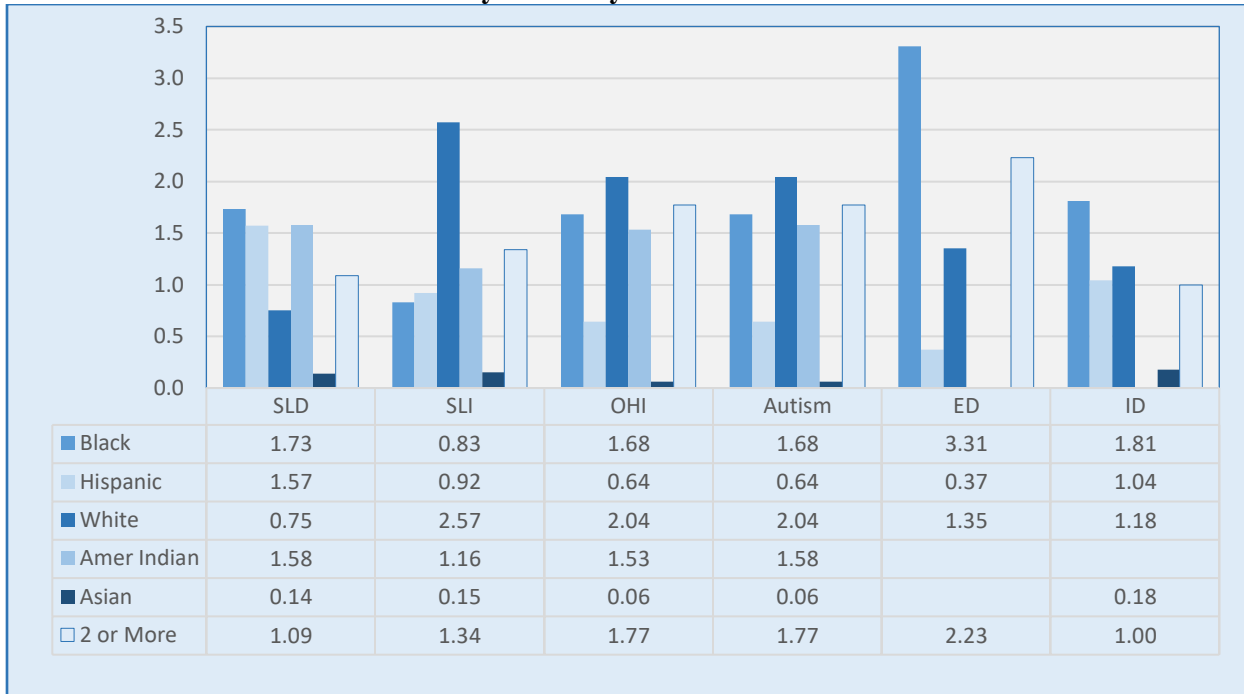
Exhibit 1j. Race/Ethnic Risk Ratios At/Above 2.0 by Disability Area



Data in exhibit 1k show all race/ethnic risk ratios in the six common disability areas, which include those areas discussed above with risk ratios higher than 2.0.¹¹

¹¹ Data for Native Hawaiian students and for blank cells in the exhibit are not included because of low cell numbers.

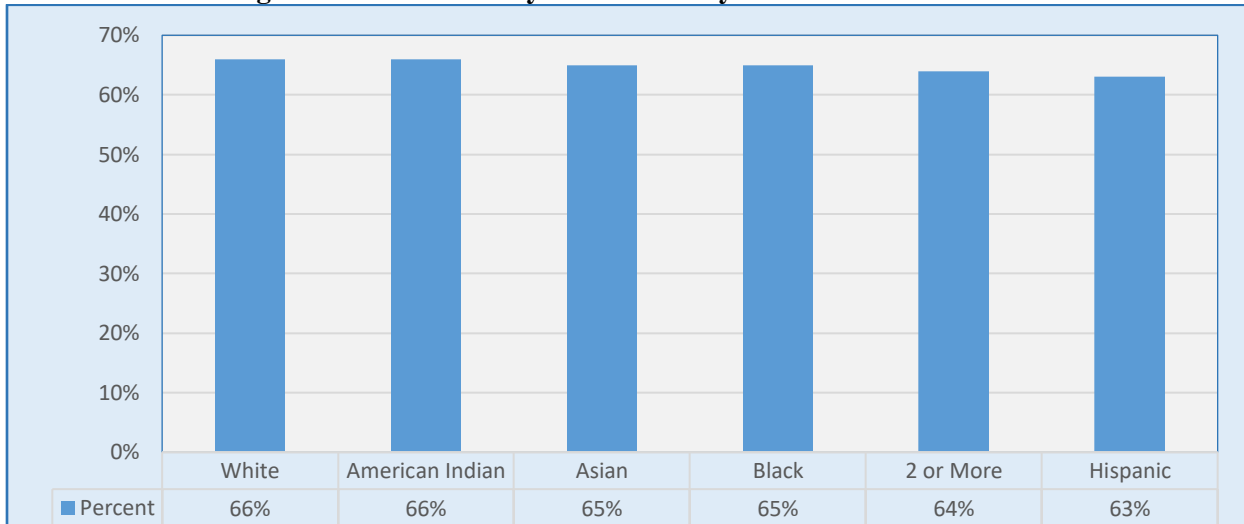
Exhibit 1k. Race/Ethnic Risk Ratios by Disability Area



Disability Incidence by Race/Ethnicity and Gender

Overall, males comprised 64 percent of all students with IEPs. There was little variance, however, by race/ethnicity when considering gender. The proportion of males was highest among White and American Indian students (each at 66 percent) and lowest among Hispanic students (63 percent).¹² (See exhibit 1l.)

Exhibit 1l. Percentage of Male Students by Race/Ethnicity



¹² Data for Native Hawaiians is not included because of the low cell numbers.

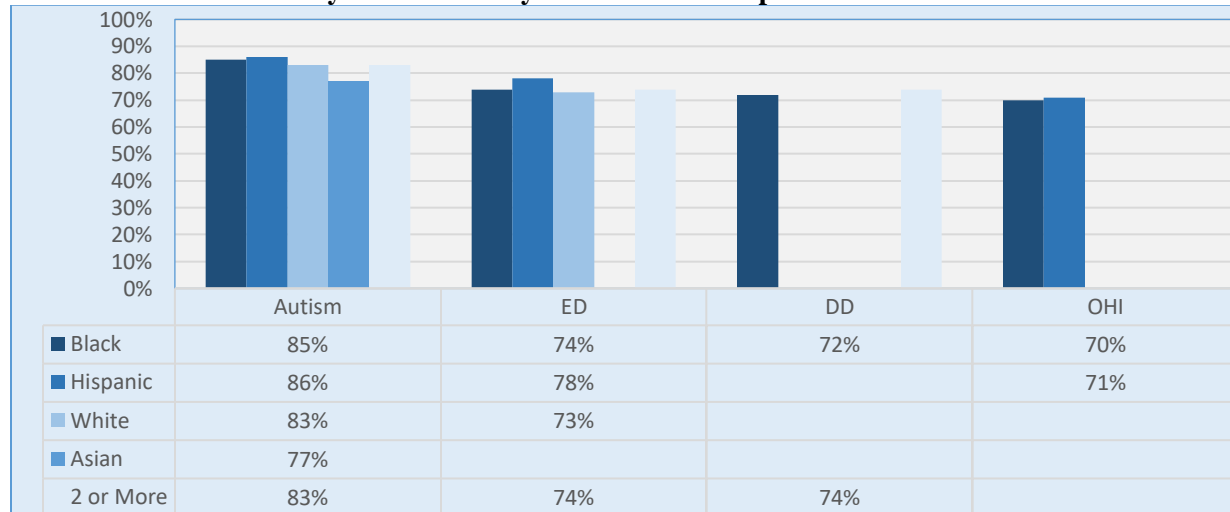
Improving Special Education Services in the Omaha Public Schools

Percentages vary significantly, however, when examining the composition of males and females by disability area. Data in exhibit 1m show four disability areas that had a male racial/ethnic group of 70 percent or more.

- **Autism.** Consistent with national statistics, male students comprised a much higher percentage of students with autism regardless of race/ethnicity. Figures ranged from 77 percent (Asian) to 86 percent (Hispanic) and 85 percent (Black). According to *Autism Speaks*, boys were four times more likely to be diagnosed with autism than girls.¹³ A recent National Institutes of Health study found a “single amino acid change in the NLGN4 gene, which has been linked to autism symptoms, may drive this difference in some cases.”¹⁴
- **Emotional Disturbance.** The composition of male students with ED by race/ethnicity ranged from 73 percent (White) to 78 percent (Hispanic).
- **Developmental Delay.** In the category of DD, 72 percent of Black students and 74 percent of multiracial students were male.
- **Other Health Impairment.** In the category of OHI, 70 percent of Black students and 71 percent of Hispanic students were male. These percentages are likely due to attention deficit hyperactivity disorder.
- **Black Males.** Seventy percent or more of students with DD, OHI, autism, and ED were male. No other category males that were above 70 percent in each of these areas.

In the categories of ED, OHI, and DD, there does not appear to be any scientific neurological or biological basis for the disproportionately high composition of males among the various racial/ethnic groups.

Exhibit 1m. Disabilities by Race/Ethnicity with a Male Composition of 70 Percent or More



¹³ Retrieved from <https://www.autismspeaks.org/autism-statistics>.

¹⁴ Retrieved from <https://www.news-medical.net/news/20200402/New-study-offers-clues-to-why-autism-is-more-common-in-boys-than-in-girls.aspx>.

Follow-up Study Questions – Disability Incidence by Race/Ethnicity and Gender

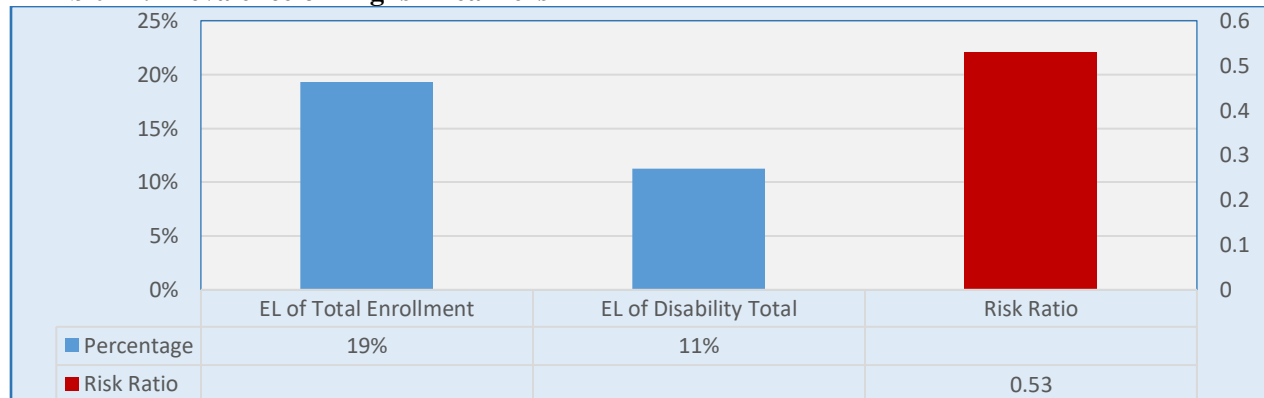
The above data on students with disabilities by race/ethnicity and gender raises various issues for further study by a multidisciplinary group of OPS staff. Questions might include the following –

- Does OPS have a process in place for collecting and tracking data like what is shown in exhibits 1h-1m, and using cross-departmental personnel for their review and follow-up action?
- What factors might contribute to the high disproportion of:
 - Black and Multiracial students with ED and of White students with SLI or OHI. (Exhibit 1j)
 - Black, Hispanic, White, and Multiracial males diagnosed with ED. (Exhibit 1l)
 - Black and Hispanic males diagnosed with OHI. (Exhibit 1l)
 - Black and Multiracial males diagnosed with DD. (Exhibit 1l)
 - Black males diagnosed with DD, OHI, autism, or ED. (Exhibit 1l)
- Based on these factors, are there educational and social/emotional strategies that OPS could employ/improve using MTSS to improve students’ achievement and well-being that could improve general education supports and reduce special education reliance?
- Are there any concerns that in-home learning due to COVID-19 and decreased levels of performance/social emotional behavior might increase male referrals for the disability areas referred to above?
- Does the OPS special education operational manual contain information relevant to race/ethnicity and English language acquisition, and is this information included in training?

Disability and English Learners

Overall, English learners (ELs) in grades kindergarten through 12 made up 19 percent of the total student enrollment and 11 percent of all students with disabilities. ELs were 0.53 times less likely than students who were not English learners to have an IEP. (See exhibit 1n.)

Exhibit 1n. Prevalence of English Learners



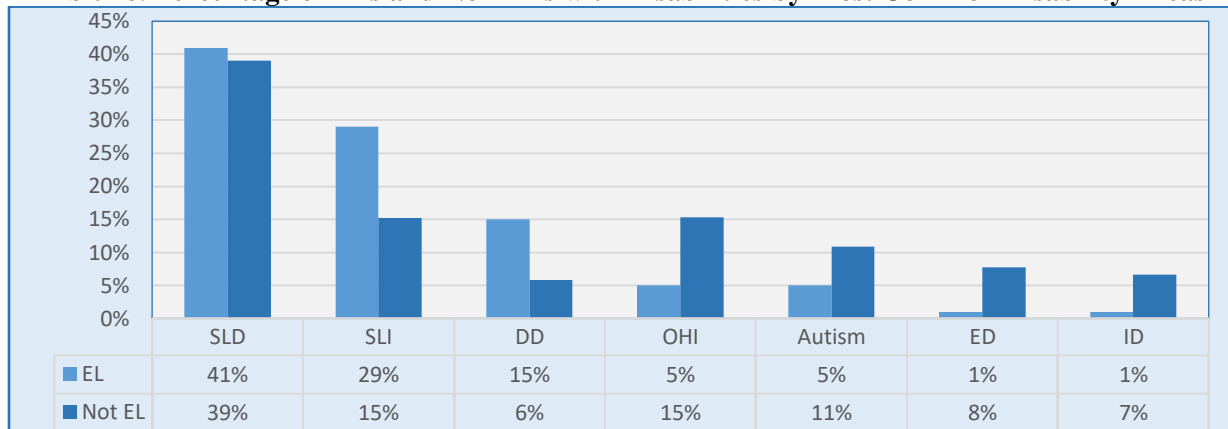
Although neither the U.S. Department of Education nor NDE monitor this area for significant disproportionality, this analysis is important to understand identification patterns among English learners.

Percentage of Students with IEPs by EL/Not-EL for Most Common Disability Areas

Exhibit 1o shows the percentage of ELs with IEPs compared to non-ELs in each of the following common disability areas.

- **Larger EL Percentages.** In the areas of DD and SLI, the composition of English learners is much larger than for non-ELs. The difference is smaller in the area of SLD.
 - **SLD.** Comprised 41 percent of ELs compared to 39 percent of non-ELs.
 - **SLI.** Comprised 29 percent of ELs compared to 15 percent of non-ELs; and
 - **DD.** Comprised 15 percent of ELs compared to 6 percent of non-ELs.
- **Smaller EL Percentages.** In the areas of OHI, autism, ED, and ID, the composition of English learners is much smaller than non-ELs.
 - **OHI.** Comprised 5 percent of ELs compared to 19 percent of non-ELs;
 - **Autism.** Comprised 5 percent of ELs compared to 11 percent of non-ELs;
 - **ED.** Comprised 1 percent of ELs compared to 8 percent of non-ELs; and
 - **ID.** Comprised 1 percent of ELs compared to 7 percent of non-ELs.

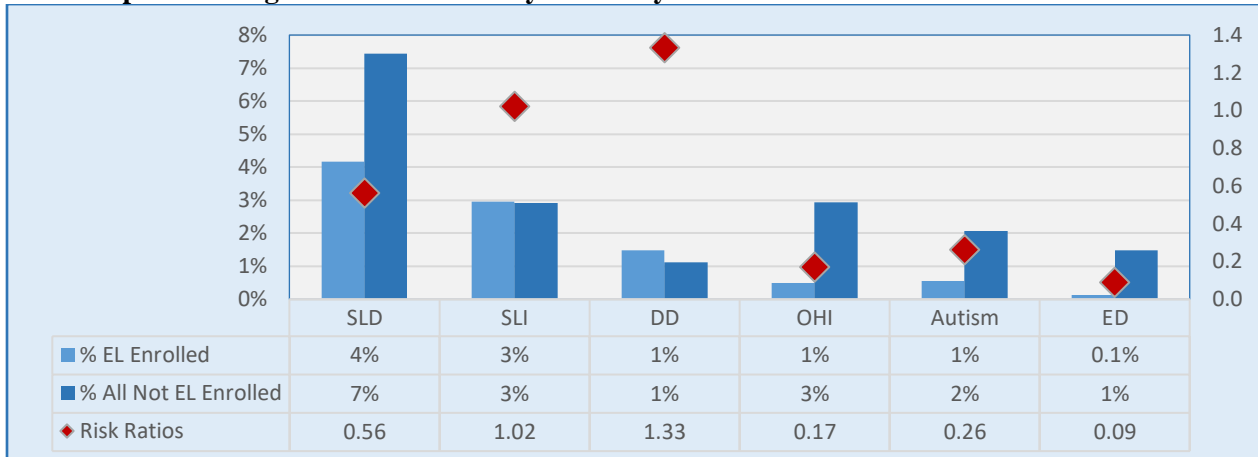
Exhibit 1o. Percentage of ELs and Non-ELs with Disabilities by Most Common Disability Areas



Percentage of Disability by ELs/Non-ELs by Disability of All Enrolled ELs/Non-ELs, and Risk Ratios

When examining their proportion of all enrolled students in each group, one finds that the percentage differences between EL and non-EL students are smaller. Risk ratios among ELs compared to non-ELs are based on these factors. As data in exhibit 1p shows, risk ratios for ELs are not high in any disability area. The risk ratio for DD was highest at 1.33, followed by SLI at 1.02. The lowest risk ratios are in ED (0.09), OHI (0.17), autism (0.26) and SLD (0.56).

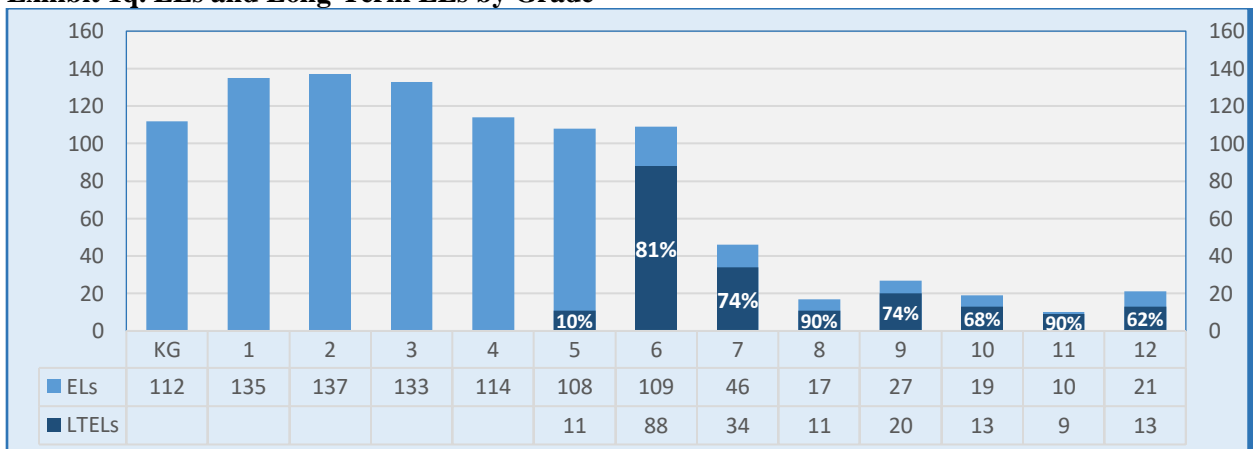
Exhibit 1p. Percentage of ELs/Non-ELs by Disability of All Enrolled ELs/Non-ELs and Risk Ratios



Number of ELs and Number/Percentage of LTELs by Grade

Exhibit 1q shows the number of ELs and long-term ELs (LTELs) with disabilities by grade. LTELs are those who have been an English learner for six years or longer. ELs numbered 112 in kindergarten and 135 in first grade. The numbers remained about the same through third grade (133 students) and decreased at fourth grade (114 ELs). The numbers of ELs remained steady at fifth grade (108) and sixth grade (109), and they decreased between seventh and twelfth grade (46 to 21 students). The percentages of ELs who were long-term were highest between sixth and twelfth grades, and they ranged from 68 percent (tenth grade) to 90 percent (ninth grade and eleventh grades). From seventh grade on, the number of LTELs were small, ranging from 9 to 34. Note that the number of ELs and LTELs at twelfth grade included students with disabilities who remained in school to engage in postsecondary transition services.

Exhibit 1q. ELs and Long-Term ELs by Grade

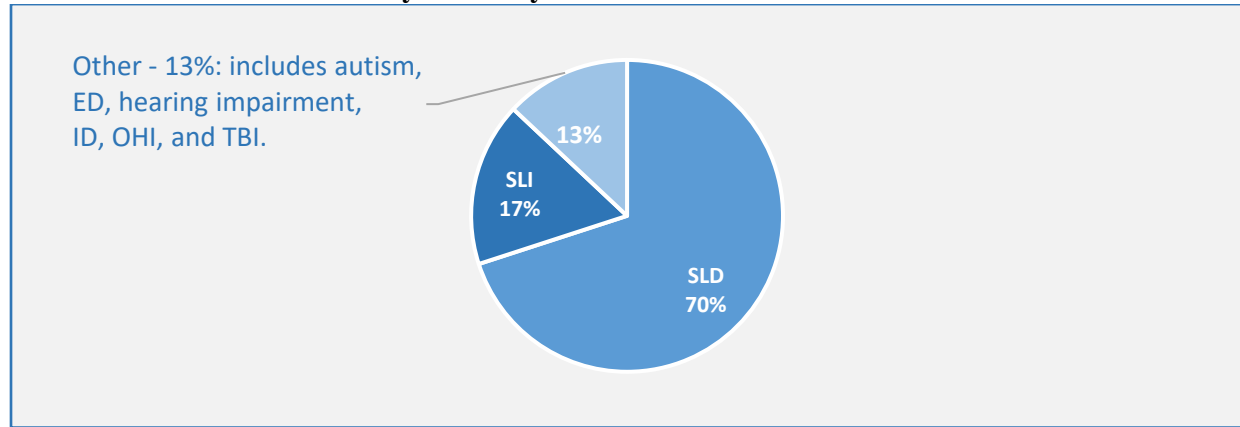


Composition of Disability for Long-Term ELs

Of all long-term ELs, 70 percent had a specific learning disability (SLD) and 17 percent had a speech/language impairment (SLI). The smallest group (13 percent) were related to all other

disability areas, which included those who may have required more intensive supports: autism, emotional disturbance, hearing impairments, intellectual disabilities, other health impairment, and traumatic brain injury). (See exhibit 1r.)

Exhibit 1r. Percent of LTELs by Disability Area

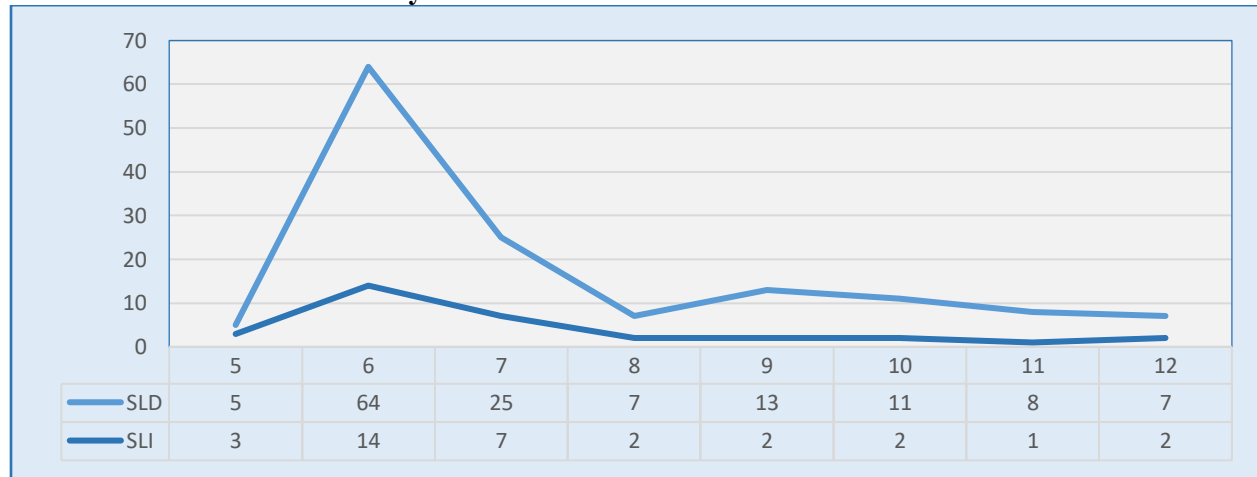


Long-Term ELs with SLD and SLI

Looking further at the largest areas of LTELs (SLD and SLI), like all LTELs with IEPs, the numbers increased significantly at sixth grade. The numbers among both groups of students decreased between seventh and twelfth grades. (See exhibit 1s.)

- **SLD.** The number of LTELs increased from 5 students (fifth grade) to 64 students (sixth grade), and then fell to 25 students in seventh grade and continued to fall through twelfth grade when only 7 LTELs remained.
- **SLI.** The number of LTELs increased from 3 students (fifth grade) to 14 students (sixth grade), and then began to fall in seventh grade (7 students), and it continued to fall until only two LTELs remained in twelfth grade.

Exhibit 1s. Number of LTELs by Grade for SLD and SLI



Follow-up Study Questions – Disability and English Learners

The above data on English learners with disabilities raises several follow-up issues. Study questions for a multidisciplinary group of OPS staff might include the following –

- Although the SPP does not require the collection of data to assess disproportionality issues related to ELs and disability, does OPS have a process in place for collecting and tracking data like that shown in exhibits 1n-1s, and using cross-departmental personnel for review and follow-up action?
- What factors might contribute to disparities, such as the following:
 - Larger percentage of ELs compared to non-ELs with a speech/language impairment or developmental disability. (Exhibit 1o)
 - Lower percentages of ELs compared to non-ELs with an other health impairment, autism, emotional disturbance, or intellectual disability. (Exhibit 1o)
 - Sudden decrease of ELs from sixth to seventh grade. (Exhibit 1q)
 - Larger proportion of long-term ELs identified as having a specific learning disability compared to all other disability areas. (Exhibit 1r)
 - Large decrease of long-term ELs with a specific learning disability from sixth to seventh grade. (Exhibit 1s)
- Based on these and other analyses, does OPS’s MTSS model and its school implementation practices address the diagnostic and instructional needs of EL students to improve general education supports, improve English language acquisition, and reduce special education reliance?
- Do OPS screening, evaluation and/or eligibility determination practices need improvement to address disability needs of English learners?

Section 504

Section 504 of the Rehabilitation Act of 1973 (Section 504 or 504) is a civil rights law that prohibits discrimination based on disability in any program or activity that receives federal financial assistance. When the Americans with Disabilities Act (ADA) was amended in 2008, Congress expanded the interpretation of eligibility to apply also to Section 504 of the Rehabilitation Act (Section 504). Under Section 504, students are eligible if the following three criteria are met--when a student:

- 1) has a mental or physical impairment;
- 2) that substantially limits;
- 3) a major life activity.

In the school setting, these students generally receive a Section 504 plan but do not need special education, which would trigger IDEA eligibility. However, the students benefit from the receipt

of related services, and/or supplementary aids, and services. Eligible students also have suspension/expulsion and other procedural safeguards under Section 504.

OPS and National Data

With the ADA and Section 504's expanded interpretation, many more students across the nation have become eligible for educational supportive services. According to the latest 2015-16 Civil Rights Data Collection, some 2.3 percent of students nationally receive services under Section 504.¹⁵ This percentage more than doubled from 2009-10's estimate of 1.1 percent, which was the first year that the Civil Rights Data Collection reported state and national estimates for Section 504 apart from IDEA.¹⁶ Based on OPS data, only 0.7 percent (or 360 students) receive Section 504 services in the district.

Relationship to Health Plans

Typically, health plans developed by school nurses or other health personnel and parents have been used to document student health issues and associated services/attention students need, e.g., medication, food allergy alerts, insulin injections, etc. When applying the expanded ADA interpretation, the question becomes whether a student's need for a health plan is related to an impairment that substantially limits one or more of the student's major life activities, and would trigger Section 504's child-find and procedural safeguard requirements. According to OPS representatives, the district does not have a way to track how many students have a health plan.

Follow-up Study Questions – Section 504

With low numbers/percentages of students with Section 504 services in OPS and no data for tracking students with health plans, follow-up study questions might include the following –

- Does the district have written procedures and practices for Section 504 evaluation and eligibility processes? Is this information written in a user-friendly manner and available online?
- Have school-based personnel received ongoing training on these processes?
- Does the district have an electronic process for developing/monitoring Section 504 evaluations, eligibility determinations, and planning?
- Does the district have a process for considering if a student with a physical/mental health impairment that justifies a written health plan might meet Section 504 eligibility criteria, i.e., the student's physical/mental impairment substantially limits a major life activity?

AREAS OF STRENGTH

The following are OPS areas of strength related to the demographics of students with disabilities.

¹⁵ Retrieved from https://ocrdata.ed.gov/StateNationalEstimations/Estimations_2015_16 (Enrollment and Section

¹⁶ https://ocrdata.ed.gov/StateNationalEstimations/Projections_2009_10

- **Disability Rates by Category.** OPS's disability rates are like the state's in the areas of OHI, autism, ED, and ID. There are small differences between district, state, and national rates in the areas of SLD and SLI. (Exhibit 1a)
- **Initial Evaluations Resulting in a Disability Finding.** For students who received an initial evaluation during the 2018-19 school year, 83 percent were found to have a disability. This outcome indicates that students are screened to determine their need for an evaluation, resulting in fewer students found ineligible for special education.
- **Disability Rates by Race/Ethnicity.** Overall, the percentages of students by disability area and by race/ethnicity are not disproportionate. (Exhibit 1g-h)
- **Proportion of Male to Females with Disabilities.** Overall, males comprise 64 percent of all students with IEPs. There is very little variance by race/ethnicity when considering the proportion of all male to female students with IEPs. (Exhibit 1k)
- **English Learners with Disabilities.** Overall, English learners do not comprise a disproportionately high composition of students with disabilities. ELs are not much more likely than non-ELs to be identified with SLD, SLI or DD. (Exhibit 1m)
- **Long-Term English Learners.** The number of long-term ELs decrease significantly from sixth grade (88) through twelfth grade (13). (Exhibit 1p)

OPPORTUNITIES FOR IMPROVEMENT

The following are opportunities for improvement in the area of demographics of students with disabilities.

- **Overall Disability Rate.** Some 19 percent of OPS students have an IEP, compared to 14 percent in the state and 15.6 percent nationally.
- **Young Children with Disabilities.** Various disability categories for young children have percentages that are much larger or smaller than the state and/or nation. (Exhibit 1a)
- **Disability Category Trends by Grade.** The number of 6 to 21 year old students with various disabilities increase and decrease at various grades.
 - Autism numbers peak at second grade and generally decrease thereafter;
 - ID, OHI and SLD numbers peak at fourth, fifth and sixth grade, respectively, and then drop significantly at tenth (OHI) and eleventh grade (ID and SLD).
 - ED numbers do not peak until the ninth grade, and then they drop at tenth and eleventh grades. (Exhibit 1g)
- **High Proportion of Students by Race and Disability Area.** Various racial groups of students were at least twice as likely to be identified with a specific disability: black students with ED (3.31); multiracial students with ED (2.23); white students with SLI ((2.57), OHI (2.04), and autism (2.04). (Exhibit 1j)
- **High Proportion of Male Students by Race and Disability Area.** Four disability areas had multiracial/ethnic groups with a male composition of 70 percent or more: autism (all racial and

ethnic areas); ED (Black, White, and Multiracial); OHI (Black and Hispanic); DD (Black and Multiracial); and DD (Black and Multiracial). In the area of DD, OHI, autism, and ED, Black males comprise more than 70 percent of the group. There does not appear to be any biological or neurological basis for the disproportionately high composition of males in the areas of ED, OHI, and DD. (Exhibit 1m)

- ***Proportion of English Learners by Disability Area.*** In the areas of DD and SLI, the composition of English learners was much larger than non-ELs. In the areas of OHI, autism, ED, and ID, the composition of English learners was much smaller than non-ELs. (Exhibit 1o) Compared to non-ELs, English learners appeared to be much less likely than non-ELs to be identified as having OHI, autism, and ED (risk ratios of 0.17, 0.26, and 0.09, respectively).
- ***Long-Term English Learners.*** The composition of all English learners with IEPs from sixth through twelfth grade were disproportionately long-term ELs, with high rates ranging from 81 percent (sixth grade) to 90 percent (eighth and eleventh grades). (Exhibit 2o). Some 87 percent of these LTELs had the disabilities related to SLD and SLI. (Exhibit 1r)
- ***Section 504.*** In 2019-20, only 0.7 percent of OPS students were found to have a Section 504 disability, compared to 2.3 percent at the national level. The district did not collect data regarding students with health plans. Given the broadened eligibility standards under Section 504 and the ADA, it is probable that a large percentage of these students may meet Section 504 disability criteria.

II. ACHIEVEMENT, POSTSECONDARY TRANSITION, AND SUSPENSIONS

For more than a decade, the U.S. Department of Education (ED) has relied on 14 performance and compliance indicators that every state educational agency (SEAs) uses to establish targets and collect and report outcome data. Before that, ED issued local and state Individuals with Disabilities Education Act (IDEA) determinations based on compliance outcomes alone. This compliance focus changed seven years ago when ED's Office of Special Education Programs' (OSEP) announced its vision for results-driven accountability (RDA), which is primarily focused on improving outcomes for students with disabilities.¹⁷

Under RDA, IDEA determinations now include the following:

1. Statewide reading and math assessment participation rates (4th and 8th grades);
2. National Assessment of Educational Progress (NAEP) participation rates and percentages of basic/above scores (4th and 8th grades); and
3. Graduation and dropout rates.

In addition, Nebraska's state performance plan includes the following areas.

4. Achievement outcomes for young children;
5. Participation and performance on statewide assessments in reading and math at the elementary, middle, and high school levels;
6. Percentages of young children educated in regular early childhood classes.
7. School-aged students receiving instruction in general education classes at least 80 percent of the time;
8. Parent involvement; and
9. Secondary transition and post-school outcomes.

The information below focuses on student outcomes 1 – 4, 7, and 9. Outcomes 5 and 6 are addressed in section III, Educational Environments of Learning. Data were not available on outcome 8, which pertains to parent involvement.

Young Children Achievement Outcomes

SPP indicator #4 involves the achievement of young children with disabilities between three and five years of age. The indicator has three components: 1) appropriate behavior; 2) acquisition and use of knowledge and skills; and 3) positive social/emotional skills. For each component, calculations are made based on the percentage of children who substantially increased their skills, and those who functioned within age expectations upon exiting the early childhood

¹⁷April 5, 2012, RDA Summary, U.S. Department of Education at www2.ed.gov/about/offices/list/osers/osep/rda-summary.doc

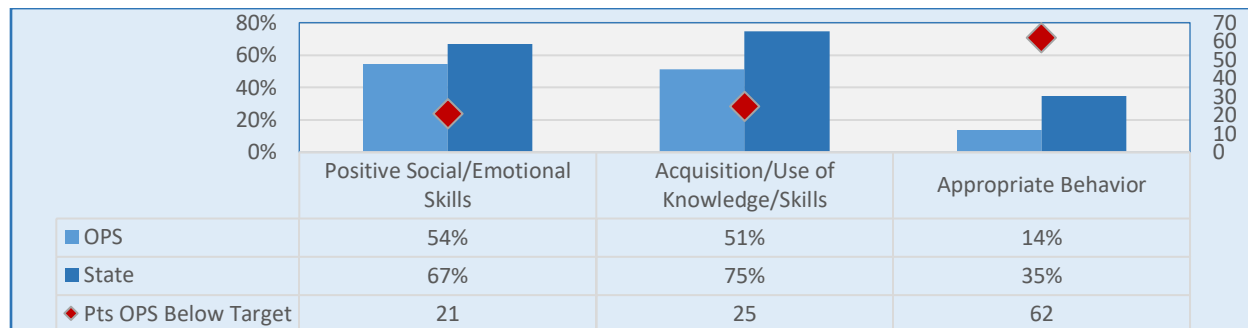
program. OPS outcomes for young children with IEPs in all six areas were substantially below state peers, and below state targets.

Substantially Increased Skills

Data in exhibit 2a show 2018-19 rates of OPS children who entered early childhood programs below developmental expectations for their age, but who increased developmentally by age six when they exited the program. The district missed state targets in all three areas.

- **Positive Social/Emotional Skills.** Some 54 percent of OPS students met standards, which was 21 percentage points below the state target. At the state level, 67 percent of students met the standards.
- **Acquisition/Use of Knowledge/Skills.** Some 51 percent of OPS students met standards, which was 25 percentage points below the state target. At the state level, 75 percent of students met the standards.
- **Appropriate Behavior to Meet Needs.** Some 14 percent of OPS students met standards, which was 62 percentage points below the state target. At the state level, 35 percent of students met the standards.

Exhibit 2a. Children Three to Five Years of Age with IEPs: Substantially Increased Skills

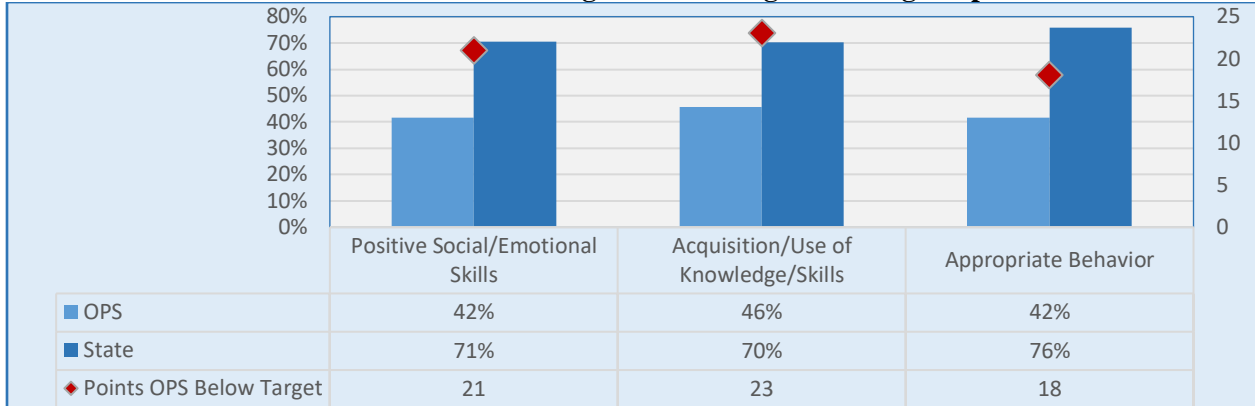


Functioning Within Age Expectations

Data in exhibit 2b show rates of OPS children functioning at age-level expectations by six years of age or who met expectations upon exiting the program. The district missed state targets in all three areas.

- **Positive Social/Emotional Skills.** Some 42 percent of OPS students met standards, which was 21 percentage points below the state target. At the state level, 71 percent of students met the standards.
- **Acquisition/Use of Knowledge/Skills.** Some 46 percent of OPS students met standards, which was 23 percentage points below the state target. At the state level, 70 percent of students met the standards.
- **Appropriate Behavior to Meet Needs.** Some 42 percent of OPS students met standards, which was 18 percentage points below the state target. At the state level, 76 percent of students met the standards.

Exhibit 2b. Children Three to Five Years of Age: Functioning Within Age Expectations



Follow-up Study Questions – Young Children Achievement Outcomes

Study questions for a multidisciplinary group of OPS staff to consider concerning achievement outcomes for children with disabilities who are three-to-five years of age might include the following –

- Does OPS have a process in place for collecting and tracking SPP achievement outcome data like that shown in exhibits 2a and 2b, and using cross-departmental personnel to review and follow-up?
- What factors might contribute to the following outcomes?
 - Low achievement compared to state and state targets among children who entered an early-childhood program below developmental expectations for their age, but who substantially increased developmentally by age six when they exited the program. (Exhibit 2a)
 - Low achievement compared to state and state targets for children who functioned within expectations by age six or who attained those expectations by the time they exited the program. (Exhibit 2b)
- Based on these analyses, are there educational and social/emotional strategies that OPS could employ/improve to expedite student growth?
- Considering the above as well as COVID-19 restrictions on in-school education are there additional concerns regarding the achievement and social/emotional well-being of these students that require additional strategies, training, and implementation practices?

Achievement on the NAEP

Beginning in 2015, the U.S. Department of Education developed a determination rating for states based on the results driven accountability framework described earlier. Two matrices were

used for this purpose, with 50 percent of the ratings based on results and 50 percent based on compliance.¹⁸ The results component is calculated using the following indicators:

- Fourth/eighth graders participating in regular statewide assessments for reading and math;
- Fourth/eighth graders scoring at or above basic in reading and math on the National Assessment of Educational Progress (NAEP); and
- Fourth/eighth graders included in NAEP testing for reading and math.

NAEP Achievement Rates for Fourth and Eighth Grade Students with IEPs

In partnership with the National Assessment Governing Board and the Council of the Great City Schools, the Trial Urban District Assessment (TUDA) was created in 2002 to support and measure student achievement in the nation's large urban school districts. In 2019, 27 urban school districts voluntarily agreed to publicly report their NAEP scores through TUDA. This has allowed for the comparison of achievement by subgroup on a single assessment. Although OPS has not participated in TUDA, the reported NAEP scores for students with disabilities from large urban districts provides benchmarks for OPS's review, and they identify relatively high performing and improving urban districts.

Exhibits 2c-f show the percentage of students with IEPs scoring basic or above in descending order for all national public schools and TUDA cities. Data show percentage point differences for each between 2017 and 2019.¹⁹

Three Florida districts posted reading/math scores in 2019 at both grades that exceeded national public-school rates: Duval County, Hillsborough County, and Miami-Dade County. The following districts joined this group in exceeding national rates by grade and content area: Clark County and Guilford County (reading, grade 4), San Diego and New York City (math, grade 8), Austin (math, both grades) and San Diego (math, grade 8).

In addition, Clark County's fourth grade results in reading and math exceeded Nevada's statewide achievement. Summaries below provide additional information on NAEP results. The information also features the highest achieving TUDA districts in each area and those showing the most growth by content and grade.

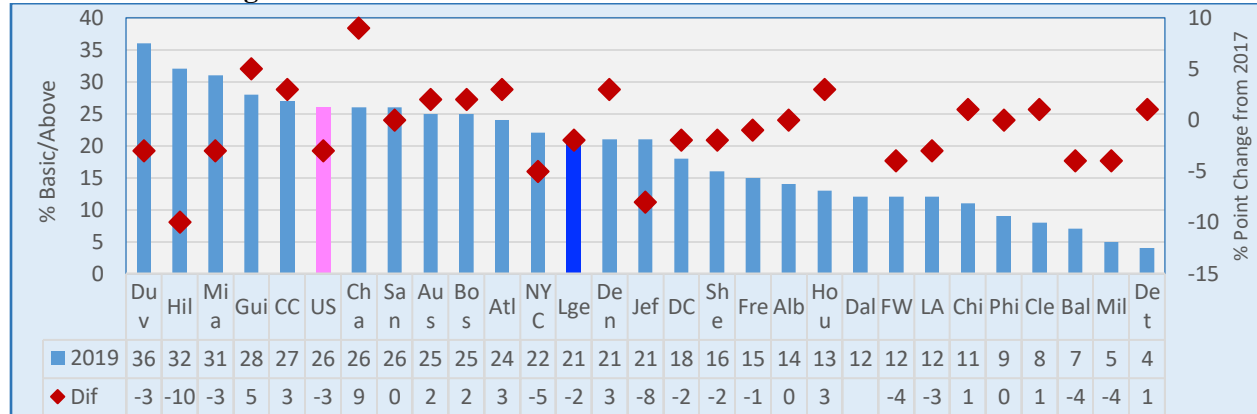
¹⁸ For a full explanation of ED's methodology, see How the Department Made Determinations under Section 616(d) of the Individuals with Disabilities Education Act in 2015: Part B <http://www2.ed.gov/fund/data/report/idea/partbspap/2015/2015-part-b-how-determinations-made.pdf>

¹⁹ These scores exclude students with disabilities under Section 504. Abbreviations used are: Alb (Albuquerque), Atl (Atlanta), Bal (Baltimore City), Bos (Boston), Cha (Charlotte), Chi (Chicago), CC (Omaha), Cle (Cleveland, Dal (Dallas), Den (Denver), Det (Detroit), DC (District of Columbia), Duv (Duvall Cty, FL), FW (Ft. Worth), Fre (Fresno), Gui (Guilford Cty, KY), Hil (Hillsborough Cty, FL), Hou (Houston), Jef (Jefferson Cty, KY), Cit (TUDA large cities), LA (Los Angeles), Mia (Miami-Dade), Mil (Milwaukee), US (National Public Schools), NYC (New York City), Phi (Philadelphia), San (San Diego), and She (Shelby Cty, TN). Source: SOURCE: U.S. Department of Education, National Center for Education Statistics, National Assessment of Educational Progress (NAEP), 2019 and 2017 Reading and Mathematics Assessment, retrieved January 17, 2020, from the Main NAEP Data Explorer.

Reading: Grade 4

Among fourth grade students with IEPs, the national public-school reading average was 26 percent at the basic level or above, compared to 21 percent among large cities overall. Five cities had rates that were 1 to 10 percentage points higher than the national rate. Charlotte-Mecklenburg, with 26 percent at basic or above, had the largest percentage point increase of 9 points between 2017 and 2019. (See exhibit 2c.)

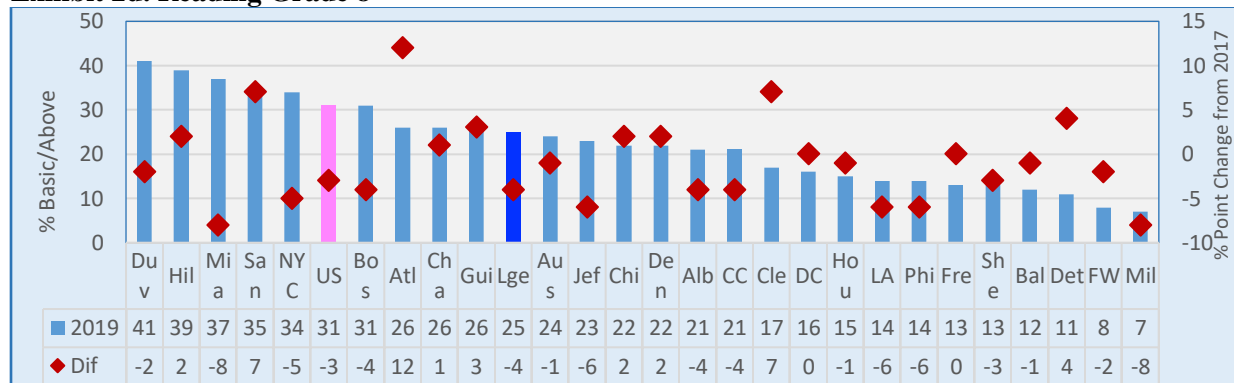
Exhibit 2c. Reading Grade 4



Reading: Grade 8

Among eighth grade students with IEPs, the national public-school reading average was 31 percent at basic levels or above, compared to 25 percent among large cities generally. Five cities had rates that were 3 to 10 percentage points higher than the national rate. Atlanta, with a rate of 26 percent, had the largest increase (12 percentage points) between 2017 and 2019. (See exhibit 2d.)

Exhibit 2d. Reading Grade 8



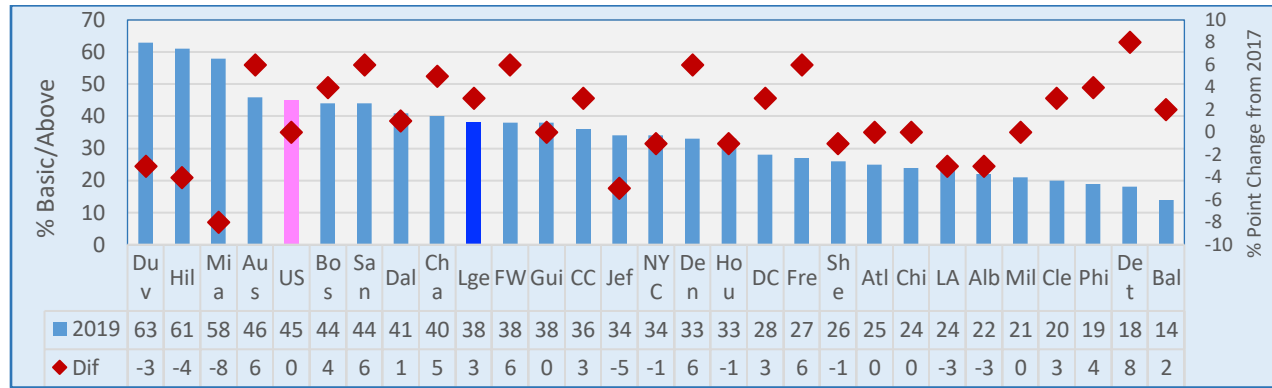
Math: Grade 4

Among fourth grade students with IEPs, the national public-school math average was 45 percent at basic levels or above, compared to 38 percent among large cities overall. Four cities had rates that were 1 to 19 percentage points higher than the national rate. Miami-Dade County, with

Improving Special Education Services in the Omaha Public Schools

a score of 58 percent, had the largest increase (8 percentage points) between 2017 and 2019. (See exhibit 2e.)

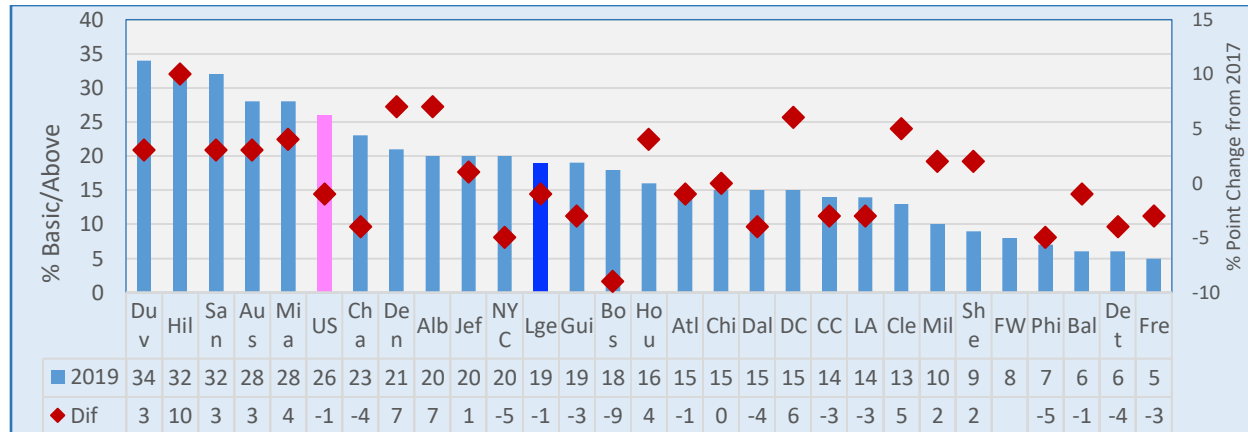
Exhibit 2e. Math Grade 4



Math: Grade 8

For eighth grade students with IEPs, the national public-school rate in math at basic levels or above was 26 percent, compared to 19 percent among large cities. Five cities had rates that were 2 to 8 percentage points higher than the national rate. Hillsborough County, with a score of 32 percent, had the largest increase (10 percentage points) between 2017 and 2019. (See exhibit 2f.)

Exhibit 2f. Math Grade 8



Follow-up Study Questions – Achievement on the NAEP

Study questions for a multidisciplinary group of OPS staff to consider in looking at NAEP outcomes might include the following –

- To what extent does OPS collect and review NAEP outcomes for children with disabilities, including comparison with state and national results?
- Would it be useful for OPS to contact Council districts showing relatively high results and/or improvement to consider strategies they used to support student growth and well-being? (Exhibits 2c – 2f)

Statewide Assessments

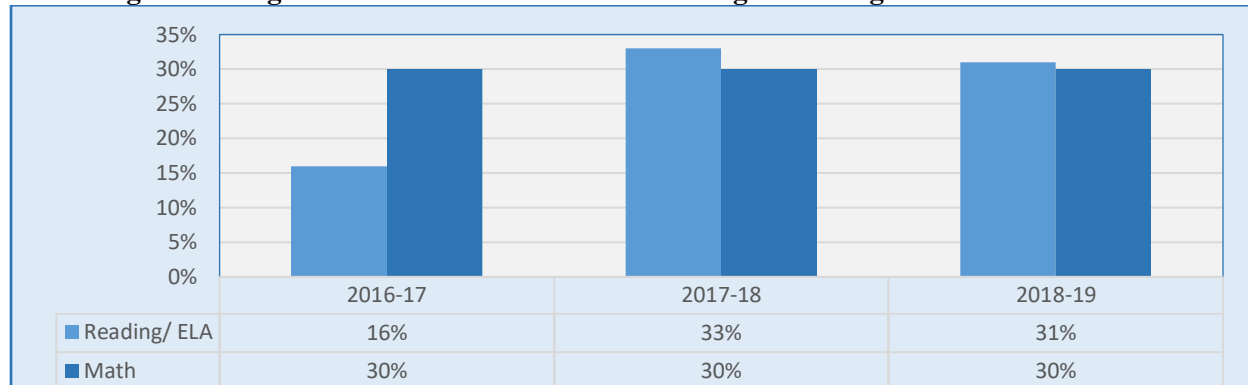
The Nebraska Student-Centered Assessment System (NSCAS) established a new statewide testing system. According to information provided by OPS staff, this assessment “embodies Nebraska’s holistic view of students and helps them prepare for success in postsecondary education, career, and civic life. It uses multiple measures throughout the year to provide educators and decision makers at all levels with the insights they need to support student learning.” NDE suspended the NCAS for the 2019-2020 school year because of the COVID-19 health crisis.

Data in exhibits 2g-2i show the percentages of OPS students with disabilities with proficient or above achievement on statewide assessments over the last three years; and the percentages of OPS students in comparison with state targets and state results in 2018-19. Also, data relevant to alternate assessment results are addressed.

OPS Three-Year Statewide Assessment Results

Based on data provided by OPS, the percentage of district students with IEPs who were at least proficient in reading/ELA on statewide assessments increased by 15 percentage points between 2016-17 and 2018-19 (16 percent to 31 percent). By comparison, math achievement remained the same over the same period (30 percent). (See exhibit 2g.)

Exhibit 2g. Percentage of OPS Students with IEPs Meeting/Exceeding State Assessment Standards



OPS Performance Report

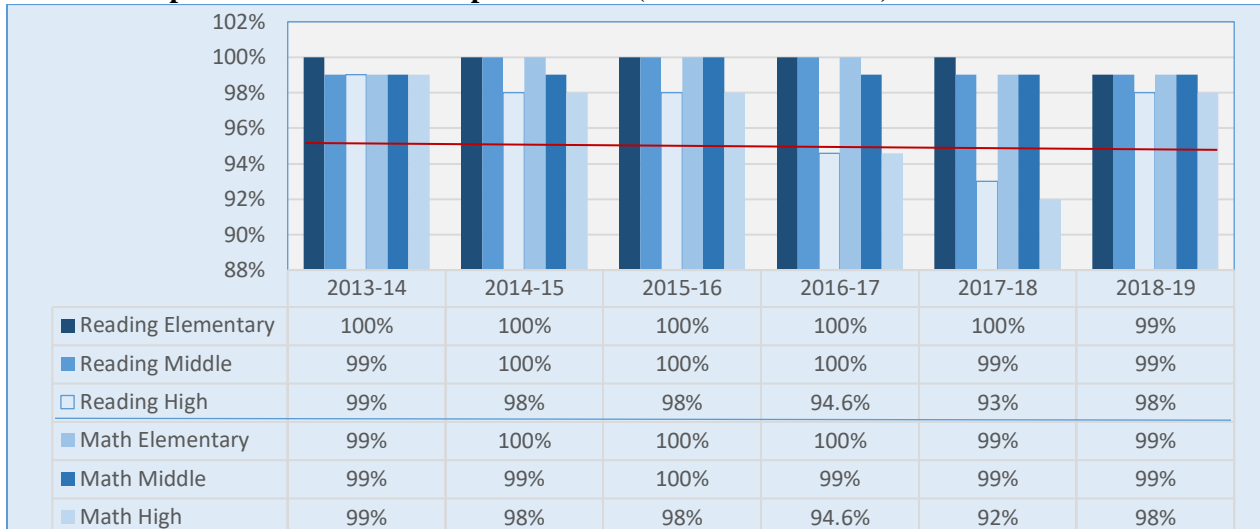
OPS provided the Council team with the state’s NDE Performance Report for the district. This information included multiple years of participation rates on statewide assessments, and the numbers of students with IEPs meeting state standards in reading and math at elementary, middle, and high school levels. As shown in exhibit 2h and 2i, the performance of OPS students with IEPs is lower than the data OPS provided the team (exhibit 2g).

Participation Rates

Except for two years (2016-17 and 2017-18) between 2014-15 and 2018-19, the portion of students receiving special education exceeded the federally required 95 percent assessment participation rate. In 2016-17 and 2017-18, high school students did not meet the participation

requirement in both reading and math assessments. This problem was corrected in 2018-19 when the special education participation rates in all areas and grade levels exceeded 95 percent, when the rates ranged from 97.83 percent to 99.46 percent. (See exhibit 2h.)

Exhibit 2h. Special Education Participation Rates (2014-15 to 2018-19)

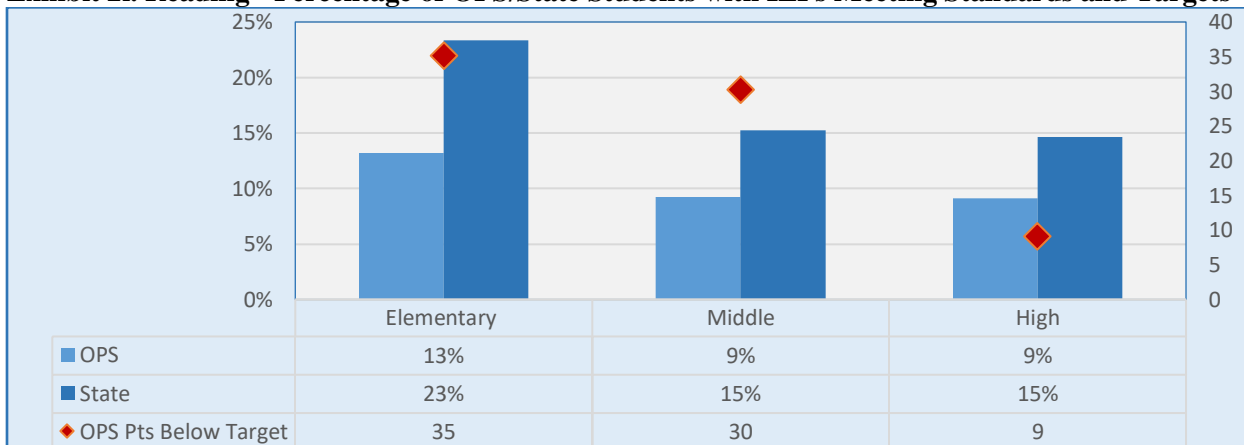


Reading

At each grade level, the 2018-19 NDE Performance Report shows reading percentages for students with IEPs at all grade levels were lower than the 31 percent overall figure reported by OPS (exhibit 2g): elementary (13 percent), middle (9 percent) and high school (9 percent) levels. (See exhibit 2i.) The grade level rates were about the same as those in 2016-17, except that the elementary level figure fell by 5 percentage points in 2018-19.

Overall, the district’s achievement lagged state targets (by 35, 30, and 9 percentage points, respectively.) Also, at each grade level, the district’s 2018-19 achievement rates were 20 to 6 percentage points lower than state rates.

Exhibit 2i. Reading - Percentage of OPS/State Students with IEPs Meeting Standards and Targets

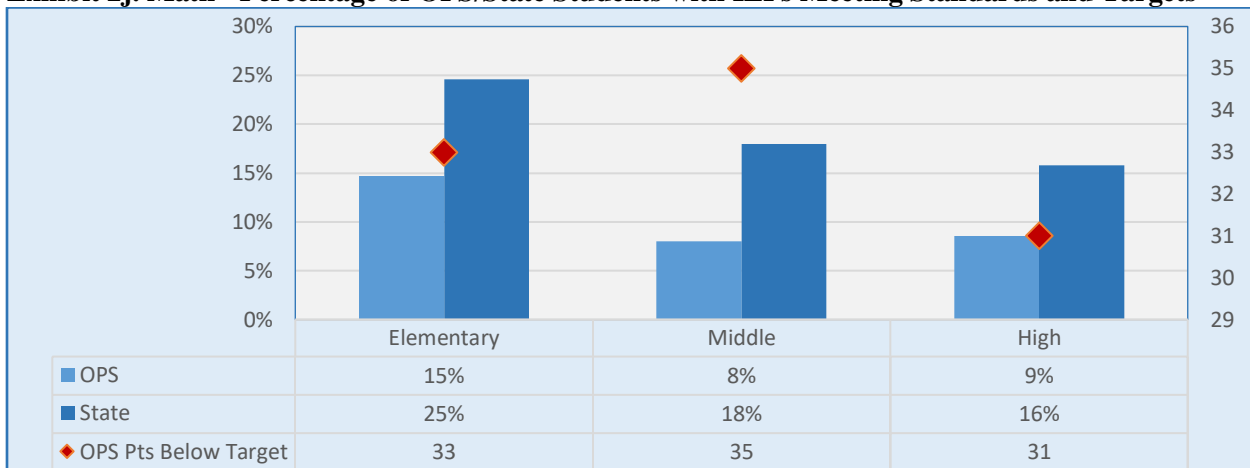


Math

At each grade level, math figures for students with IEPs in 2018-19 were far lower than the 30 percent overall number reported by OPS: elementary (15 percent), middle (8 percent) and high school (9 percent) levels. These grade level rates were lower than in 2016-17: by 16 percentage points (elementary), 7 percentage points (middle), and 4 percentage points (high).

Also, the district’s achievement lagged state targets (by 33, 35, and 31 percentage points, respectively.) Also, at each grade level, the district’s 2018-19 achievement rates were 10 to 7 percentage points lower than state rates. (See exhibit 2j.)

Exhibit 2j. Math - Percentage of OPS/State Students with IEPs Meeting Standards and Targets



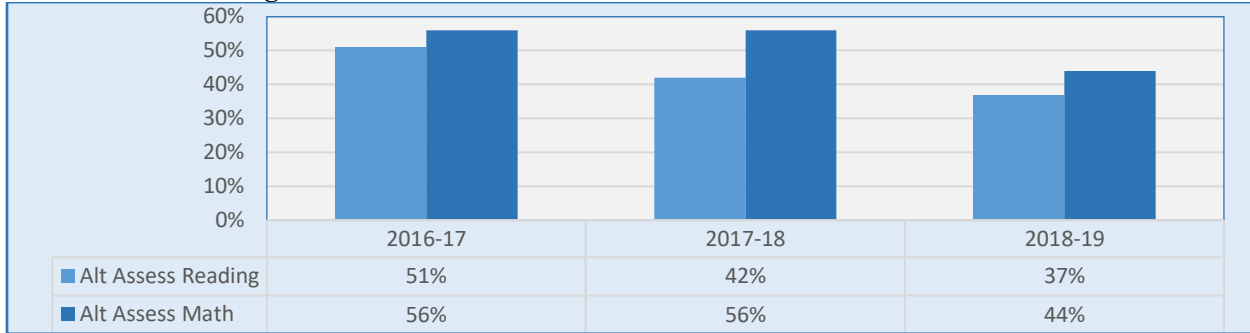
Alternate Assessments

The *Every Student Succeeds Act* (ESSA) established a maximum one percent threshold for states on the percentage of students with significant cognitive disabilities taking alternate assessments. The denominator for this percentage is the number of all school-aged students in grades required to take statewide assessments. If an LEA exceeds the threshold in any assessment area, the LEA is required to notify NDE and provide educational justifications for the deviation.

Based on OPS data, some 26,773 students were enrolled in third through eighth grades, and eleventh grade. The one percent threshold amounted to some 268 students. In 2018-19, 401 students in OPS took an alternate assessment--or 1.5 percent. The number was somewhat lower than the previous two school years (385 and 390 students). The district did not provide the Council team with a copy of its waiver request to NDE, information on whether it was approved, or steps OPS had taken to address the issue.

As shown in exhibit 2k, a higher percentage of students with IEPs earned proficient/above scores on statewide alternate assessments than on regular assessments. However, percentages dropped in both reading and math between 2016-17 and 2018-19. For reading, percentages fell 14 percentage points (51 percent to 37 percent); and for math, percentages fell 12 percentage points (56 percent to 44 percent).

Exhibit 2k. Percentage of OPS Students Proficient/Above on Statewide Alternate Assessments



Follow-up Study Questions – Statewide Assessments

Study questions for a multidisciplinary group of OPS staff to consider about achievement outcomes for students with disabilities taking statewide assessments might include –

- Does OPS have a process in place for collecting and track statewide achievement outcomes like those shown in exhibits 2g – 2j, and using cross-departmental personnel for review and follow-up?
- What factors might have contributed to the following outcomes?
 - Percent of students with disabilities at/above proficiency on reading/ELA increasing in 2017-18 and decreasing in 2018-19, and flat in math from 2016-17 to 2018-19. (Exhibit 2g)
 - OPS proficient reading and math scores below state and SPP targets at the elementary, middle, and high school levels. (Exhibit 2h – 2i)
 - Some 1.5 percent of students taking an alternate assessment, which is above the federal one percent standard, which requires OPS to submit a waiver request to NDE to justify the difference.
 - Mid-level proficiency rates for OPS students taking an alternate assessment. (Exhibit 2j)
- Based on these analyses, are there educational and social/emotional strategies that OPS can employ/improve to expedite student growth? For example:
 - Is multi-sensory instruction used for students with low reading and math achievement, and if so, are these implemented with fidelity?²⁰ Are off-the-shelf programs needed to immediately expand usage of this instructional model?
 - Are other evidence-based instructional practices in place for students who are far below grade-level achievement standards in one or more area?
 - Do teachers need additional professional development to implement the items above and other instructional strategies?

²⁰ Retrieved from <https://www.understood.org/en/school-learning/partnering-with-childs-school/instructional-strategies/multisensory-instruction-what-you-need-to-know>

- Considering the above and COVID-19 past/future restrictions on in-school education and the challenges posed by distance learning, what plans, training, and human/material resources are needed to support teaching and learning?

Graduation and Dropout

Two state performance plan indicators measure graduation and dropout rates.

Graduation Rates

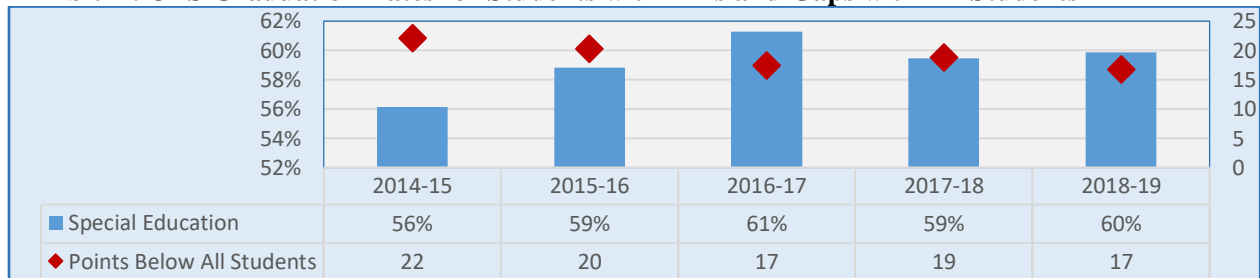
The SPP measures the percentage of students with disabilities in 12th grade and exiting ungraded students who are 18 years of age or over who graduate from high school with a regular diploma. Although the *Every Student Succeeds Act* (ESSA) allows states to develop criteria for an alternate diploma for students with the most significant cognitive disabilities, Nebraska does not authorize such a diploma. With an alternate diploma, students use an alternate assessment aligned to alternate academic achievement standards. As of September 2019, eight states had information on their websites on state-defined alternate diplomas: Arkansas, Louisiana, Mississippi, Nevada, New Hampshire, Tennessee, Utah, and West Virginia.

According to the National Center on Educational Outcomes, an alternate diploma provides students with the most significant cognitive disabilities the opportunity to earn a diploma that shows they have completed a standards-based program of study. It also potentially provides them access to post-secondary education and employment opportunities that might have otherwise been unavailable to them. ESSA allows students earning a state-defined alternate diploma to be counted in the Adjusted Cohort Graduation Rate (ACGR). In 2015, ACGR became a required part of states’ Title I accountability systems.²¹

OPS Data

OPS data in exhibit 2l show five years of graduation data (2014-15 to 2018-19) on students receiving special education, and percentage point gaps with all students. Over these years, the special education graduation rate increased from 56 percent to 60 percent, and special education rates decreased from 22 to 17 percentage points below the all-student graduation rates.

Exhibit 2l. OPS Graduation Rates for Students with IEPs and Gaps with All Students

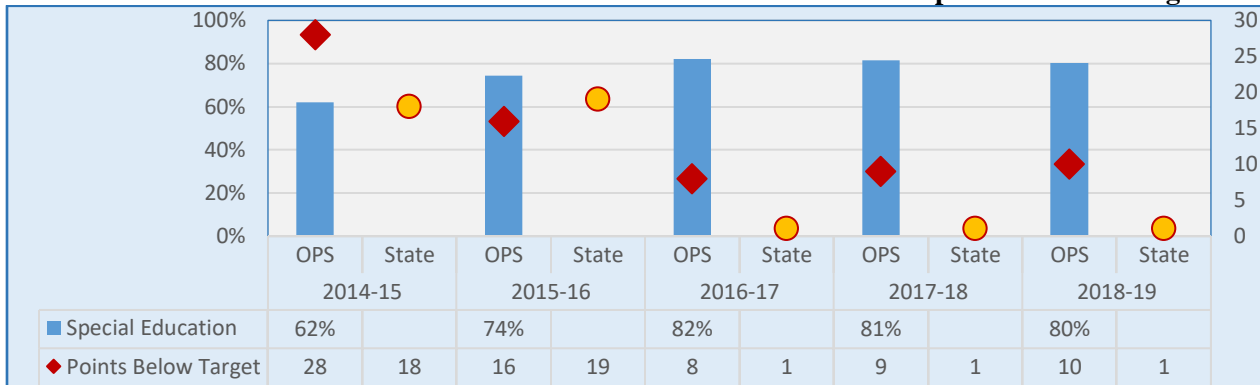


²¹ Status of State-Defined Alternate Diplomas in 2018-19, NCEO Report 416, retrieved from <https://www.transitionta.org/system/tdf/news/Status%20of%20State-Defined%20Alternate%20Diplomas%20in%202018-19.pdf?file=1&type=node&id=1849&force=0>.

NDE Performance Report

Five years of graduation data were also included in the NDE Performance Report for the district. The state’s data on each of these years were higher than the data OPS provided to the Council team. According to the performance report, special education graduation rates increased from 62 percent in 2014-15 to 80 percent in 2018-19. Percentage point gaps between district and state target rates decreased over this period from 28 to 10 percentage points below targets. At the same time, state percentage point gaps below targets fell from 28 to 1 percentage point. (See exhibit 2m.)

Exhibit 2m. Graduation Rates for OPS and State Students with IEPs Compared to State Targets



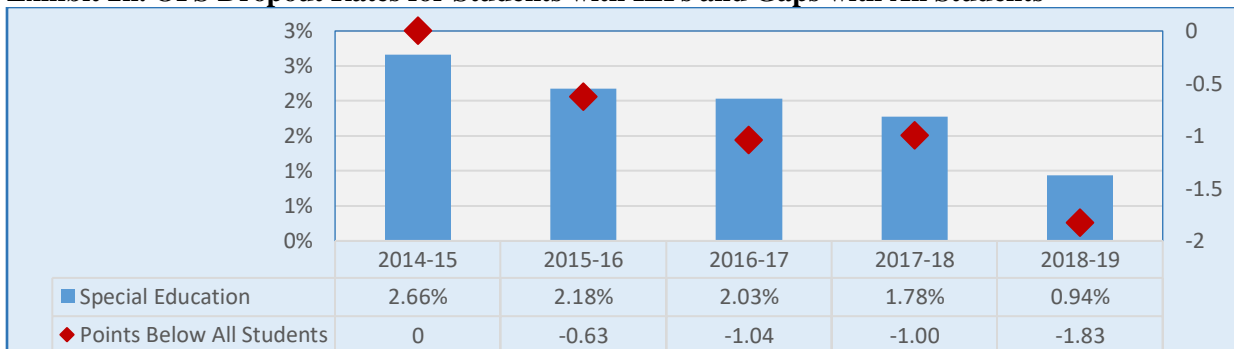
Dropout Rates

The SPP also measures the percentage of students in 9th grade and higher, who exit special education by dropping out of school.

OPS Data

OPS data in exhibit 2n show five years of dropout data (2014-15 to 2018-19) for students receiving special education, and percentage point differences with rates for all students. Over the five-year period, the special education dropout rate fell from 2.66 percent to 0.94 percent. Also, during this period, special education rates dropped from 0.00 to 1.83 percentage points below dropout rates for all students.

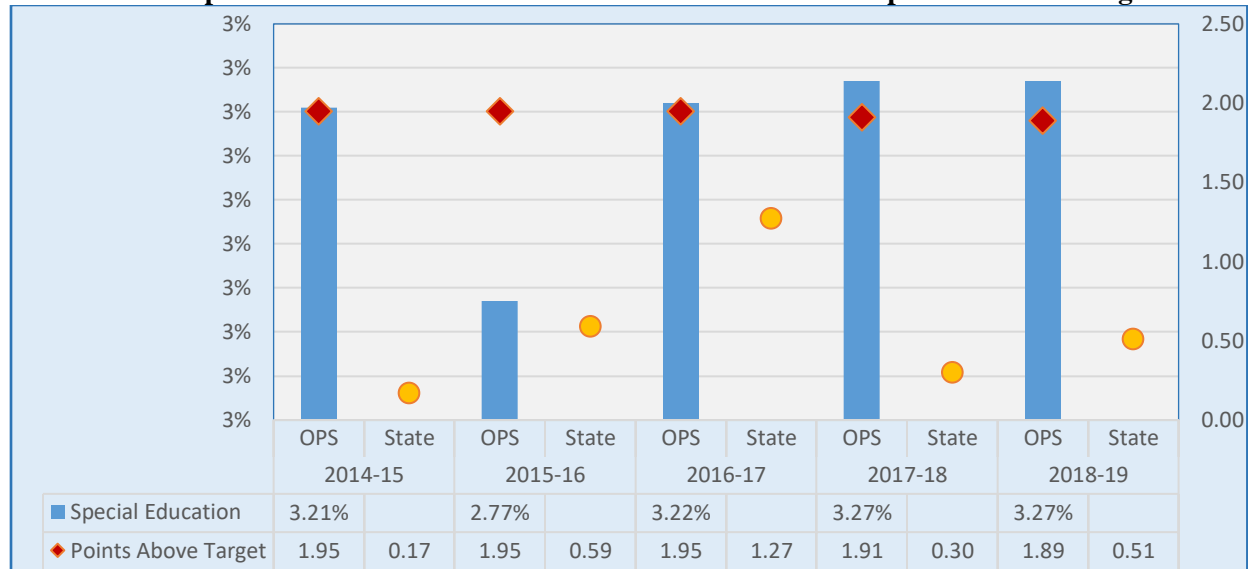
Exhibit 2n. OPS Dropout Rates for Students with IEPs and Gaps with All Students



NDE Performance Report

The state’s OPS performance report (2014-15 to 2018-19) showed higher special education dropout figures than the OPS figures provided to the Council team. According to the NDE Performance Report, special education dropout rates decreased from 3.21 percent in 2014-15 to 1.89 percent in 2018-19. Over these years, the gap between district rates and state maximum targets decreased from 1.95 to 1.89 percentage points above targets. At the same time, state gaps increased from 0.17 to 0.51 percentage points above dropout targets. (See exhibit 2o.)

Exhibit 2o. Dropout Rates for OPS and State Students with IEPs Compared to State Targets



Follow-up Study Questions – Graduation and Dropout Rates

Study questions for a multidisciplinary group of OPS staff to consider for improving graduation and dropout rates for students with disabilities might include the following –

- Does OPS have a process in place for collecting and tracking SPP achievement outcomes like that shown in exhibits 2k – 2n, and using cross-departmental personnel to review and follow-up?
- What factors might contribute to the following outcomes?
 - Slow increase between 2014-15 and 2018-19 in the percentage of students with disabilities who graduated with a regular diploma (56 percent to 60 percent) and slow decrease in the OPS graduation gap among students with disabilities and all students. (Exhibit 2k)
 - Significantly higher NDE Performance Report percentages compared to OPS data for students with disabilities who graduated with a regular diploma. (Exhibit 2l)
 - Flattening of percentage points between OPS disability graduation rates and SPP targets from 2016-17 to 2018-19. (Exhibit 2l)
 - Higher OPS disability dropout rates on the NDE Performance Report compared to OPS data from 2014-15 and 2018-19. (Exhibit 2n)

- Continuous OPS disability dropout rate above SPP target and state rates. (Exhibit 2n)
- Would Nebraska’s adoption of the ESSA allowance for an alternate diploma for students with the most significant cognitive disabilities benefit OPS students? If so, how could OPS work with NDE and with other school districts in the future to lobby for this adoption?
- Considering COVID-19 past and future restrictions on in-school education and the challenges related to distance learning, are there concerns that these circumstances could negatively affect disability graduation and drop out outcomes for 2020-21 and beyond?
- Given these considerations, what strategies, activities, training, and material/human resources are necessary to improve outcomes for students who are/could be in danger of not graduating or dropping out of school?

Secondary Transition Services and Support

State performance plans (SPP) include two indicators that pertain to secondary transitions. The first indicator relates to IEP compliance for required components, and the second relates to activities with which youth are engaged one year after leaving high school.

IEP Compliance

In Nebraska, required IEP transition components must be included and implemented no later than the first IEP to be in effect after the student turns 16 years of age. This SPP indicator has a federally required 100 percent target that is measured for students of transition age with IEPs having –

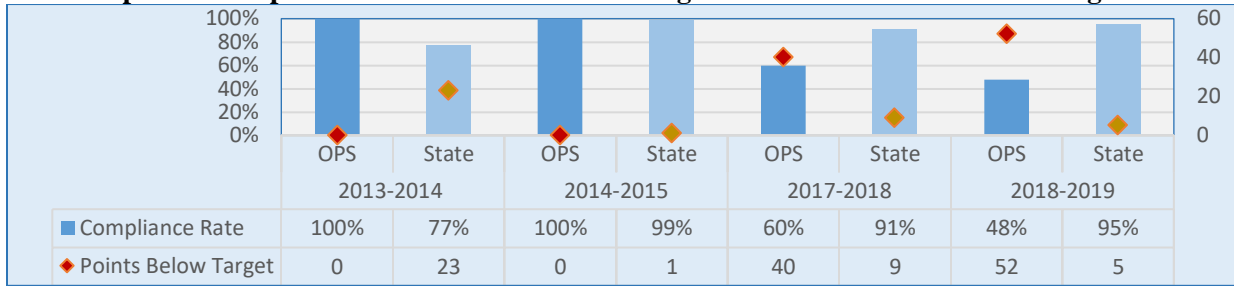
- Appropriate and measurable postsecondary goals, which are annually updated and based on an age-appropriate transition assessment;
- Transition services, including courses of study, that will reasonably enable the student to meet their postsecondary goals; and
- Annual IEP goals related to student transition service needs.

There also must be documentation that students are invited to IEP team meetings where transition services will be discussed; and documentation that, if appropriate, a representative of a participating agency was invited to the IEP team meeting with the prior consent of a parent or student who has reached majority age.

Data in exhibit 2p show IEP transition compliance data for OPS and the state indicator for the number of OPS and state percentage points below the 100 percent target. Data are shown for those years between 2013-14 and 2018-19 for which NDE collected OPS data.²² In 2013-14 and 2014-15, OPS met the 100 percent target. The district’s compliance level fell below the target in 2017-18 and 2018-19 by 40 and 52 percentage points, respectively. During these years, the state’s compliance rate decreased from 23 to 5 percentage points below target.

²² NDE was not required to collect OPS data for the 2015-16 and 2016-17 school years.

Exhibit 2p. IEP Compliance: OPS and State Percentage Points Above 100 Percent Target

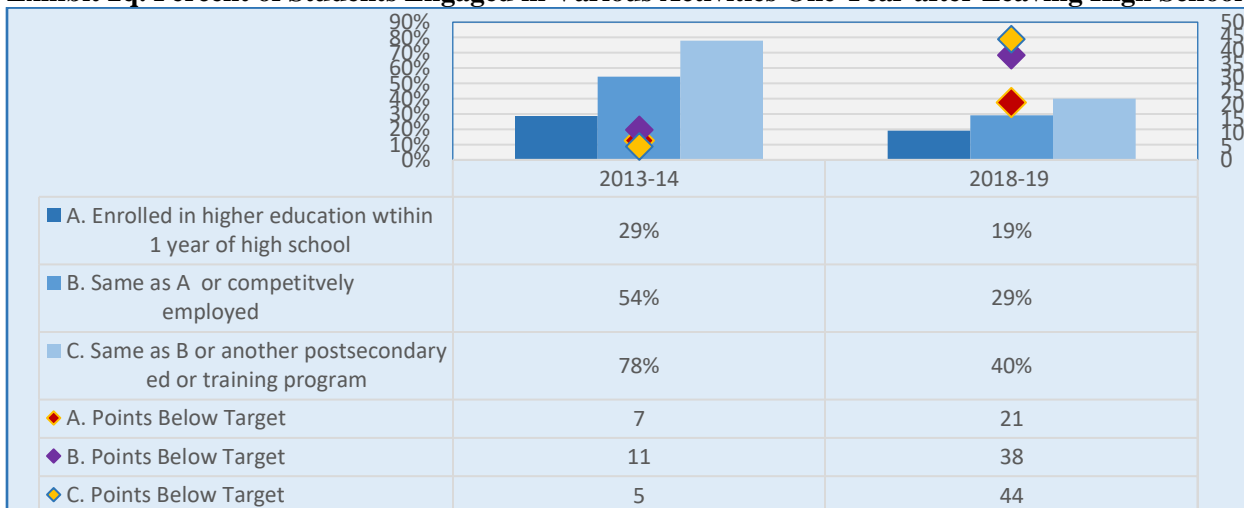


Outcomes One Year After Students Leave High School

This post-school outcome indicator has targets for the percentages of youth with IEPs engaging in three categories of educational and/or work activities within one year of leaving high school. Data for 2013-14 and 2018-19 show that OPS rates for each of the three measured categories decreased, and percentage points below the targets increased. Exhibit 2q shows this data for the two school years.

- **Enrolled in Higher Education.** The higher education enrollment rate decreased from 29 percent to 19 percent, and the number of percentage points below targets increased from 7 to 21.
- **Enrolled in Higher Education or Competitively Employed.** The rate for higher education enrollment or competitive employment decreased from 54 percent to 29 percent, and the number of percentage points below targets increased from 11 to 38.
- **Enrolled in Higher Education, Competitively Employed, or Engaged in Other Postsecondary Education or Training Program.** The rate for higher education enrollment, competitive employment, or other postsecondary education/training program decreased from 78 percent to 40 percent, and the number of percentage points below targets increased from 5 to 44.

Exhibit 2q. Percent of Students Engaged in Various Activities One Year after Leaving High School



Follow-up Study Questions – Secondary Transition

Study questions for a multidisciplinary group of OPS staff to consider for improving IEP transition compliance and work/education after leaving high school might include the following –

- Does OPS have a process in place for collecting and tracking SPP transition compliance rates and SPP outcomes one year after students with disabilities leave high school with data like that shown in exhibits 2k – 2n, and using cross-departmental personnel for review and follow-up?
- What factors might contribute to the following outcomes?
 - Decreased IEP transition compliance figures from 2013-14 (100 percent) to 2018-19 (48 percent), compared to increased state compliance (77 percent to 95 percent). (Exhibit 2o)
 - Decrease from 2013-14 to 2018-19 in percentages of students with disabilities enrolled in higher education, competitively employed, or in another postsecondary education or training program, and increase in percentage points below SPP targets. (Exhibit 2p)
- Considering the above along with COVID-19 effects on student learning, access to community-based training programs, and additional post-secondary educational option, what strategies can OPS employ in 2020-21 to address potential negative consequences for students who would graduate at the end of the school year and beyond? What internal and external resources can OPS use to support implementation of these strategies?
- What strategies can OPS employ to improve IEP transition compliance, such as improved training, edits to the IEP system that would guide data entry, etc.?

Out-of-School Suspensions

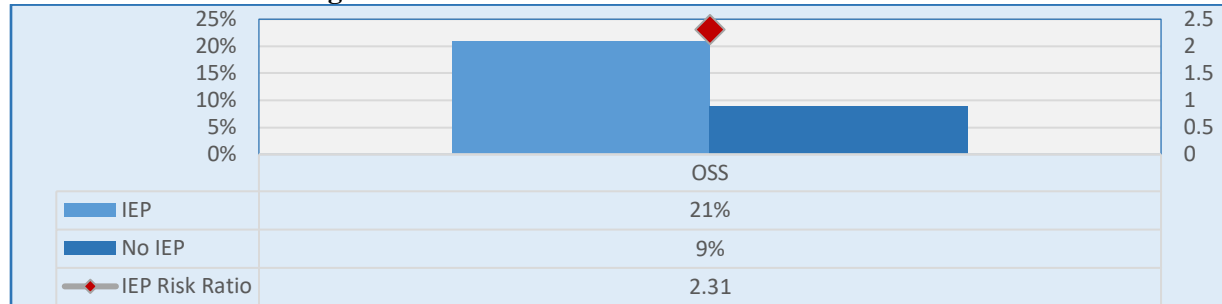
Another critical issue that affects the achievement of students receiving special education is the time they are removed from school due to suspensions. In 2018-19, students with IEPs, especially those who are Black, were more likely than those without IEPs to be suspended overall and by grade, by length of suspension, and by both grade level and length of suspension. English learners with IEPs were not disproportionately suspended compared to non-ELs.

The state performance plan also has indicators for disproportionate suspensions over 10 days for students with IEPs overall (Indicator 4a) and by race/ethnicity (Indicator 4b). These indicators use measures of disproportionality and thresholds established by each state to trigger a self-review by districts to assess the presence of policies, procedures, or practices that contribute to those disproportionalities and do not comply with requirements for the development and implementation of IEPs, the use of positive behavioral interventions and support, and procedural safeguards. According to the NDE Performance Report data for 2013-14 through 2018-19, each year OPS met state standards for both indicators. The following information is based on OPS data provided to the Council team for 2018-19.

Overall IEP/No IEP Suspension Rates and Risk Ratio

Some 21 percent of all students with IEPs received an out-of-school suspension (OSS) for at least one day, compared to 9 percent of students without IEPs. Students with IEPs were 2.31 times more likely than those without IEPs to be suspended. (See exhibit 2r.)

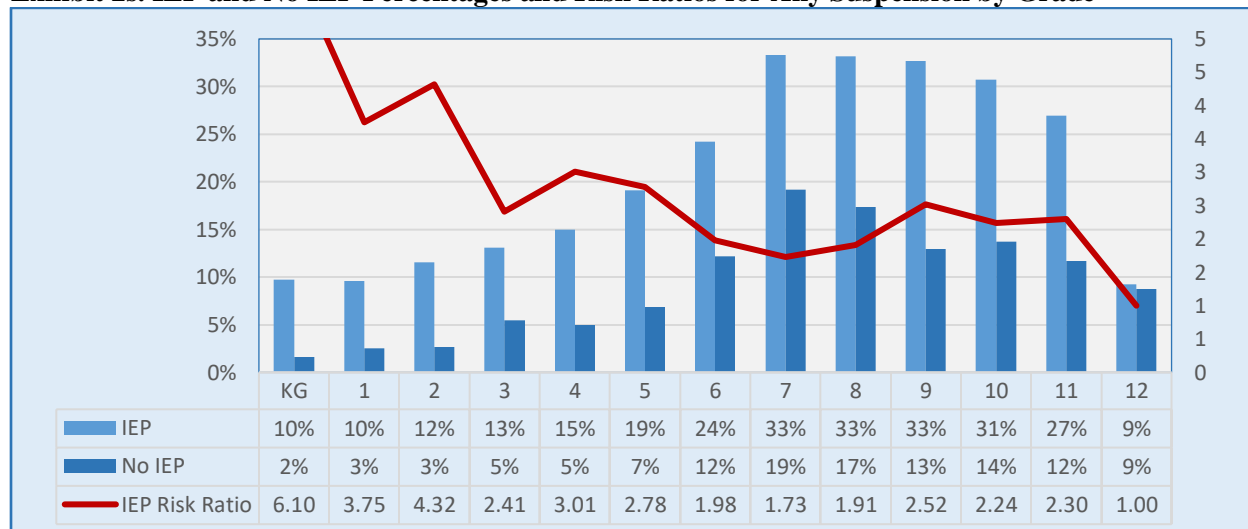
Exhibit 2r. OSS Percentages of Students with/without IEPs and IEP Risk Ratio



Suspensions by Grade

Data in exhibit 2s show the percentages of OSS for students with and without IEPs at each grade and associated risk ratios among students with IEPs. Percentages of OSSs for students with IEPs increased from 10 percent (kindergarten and first grade) to a high of 33 percent (eighth and ninth grades). The percentages decreased to 9 percent in twelfth grade, which included students with disabilities remaining in school to receive transition services. Comparing rates of students with/without IEPs, kindergarten students were 6.10 times more likely than students without IEPs to receive an OSS. In descending order, risk ratios among students with IEPs were also high at the second grade (4.32), first grade (3.75), fourth grade (3.01), fifth grade (2.78), ninth grade (2.52), third grade (2.41), eleventh grade (2.30), and tenth grade (2.24). The IEP risk ratio for twelfth grade would likely be higher if students remaining in school for transition services were excluded from the count.

Exhibit 2s. IEP and No IEP Percentages and Risk Ratios for Any Suspension by Grade

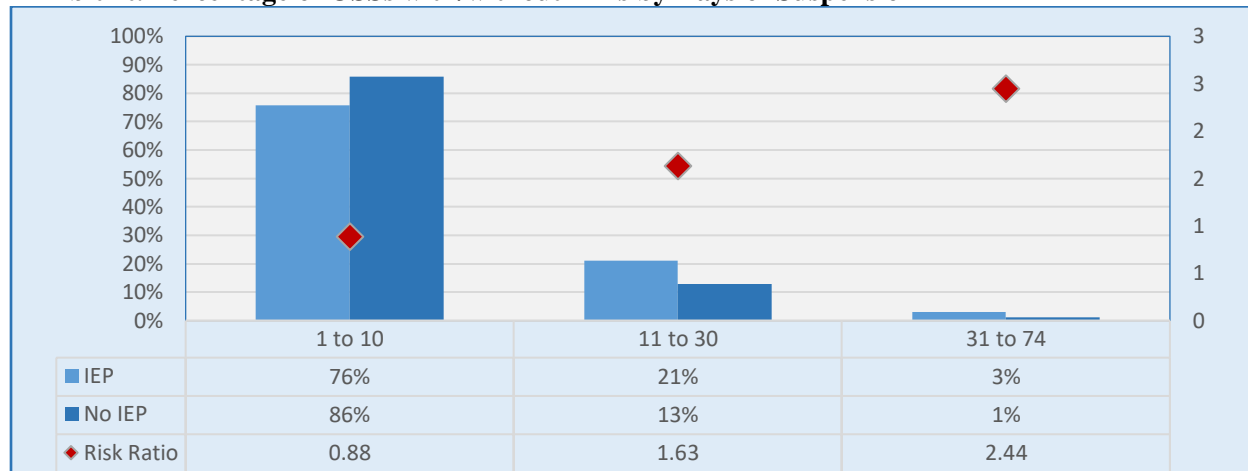


Suspensions by Number of Days

When considering the number of days students with and without IEPs were suspended, percentages and risk ratios were higher for students with IEPs as the number of OSS days increased. These comparisons are described below.

- **1 to 10 Days.** A lower percentage of students with IEPs compared to without IEPs were suspended (76 percent to 86 percent), with a corresponding low IEP risk ratio of 0.88.
- **11 to 30 Days.** A higher percentage of students with IEPs compared to without IEPs were suspended (21 percent to 13 percent, respectively), with a corresponding IEP risk ratio of 1.63.
- **31 to 74 Days.** A higher percentage of students with IEPs were suspended (3 percent to 1 percent), with a corresponding IEP risk ratio of 2.44.

Exhibit 2t. Percentage of OSSs with/without IEPs by Days of Suspension



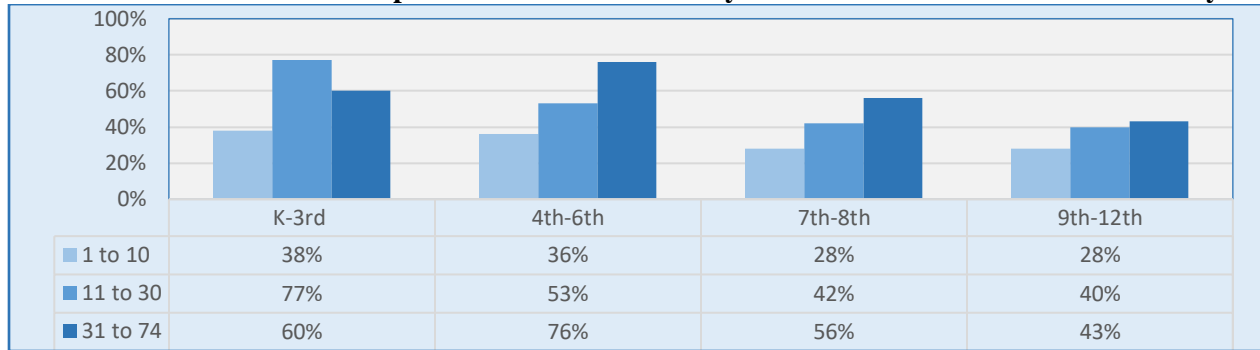
Suspensions by Grade and Number of Days

Exhibit 2u shows the composition of OSSs among students with IEPs by grade range and total days of suspension. At each grade level, students with IEPs comprised a higher percentage of suspensions than the 18 percent special education population of students in kindergarten through grade 12. With one exception (kindergarten through third grade), the percentages increased as each range of total suspension days increased. Furthermore, IEP suspensions comprised more than 50 percent of all suspensions at various grade levels. (See underlined text below.)

- **K to 3rd Grade.** Students with IEPs comprised 38 percent of all OSSs for 1 to 10 days. This figure increased to 77 percent for 11 to 30 days, and then fell to 60 percent for 31 to 74 days.
- **4th to 6th Grade.** Students with IEPs comprised 36 percent of all OSSs for 1 to 10 days. This figure increased to 53 percent for 11 to 30 days, and then increased to 76 percent for 31 to 74 days.
- **7th and 8th Grade.** Students with IEPs comprised 28 percent of all OSSs for 1 to 10 days. This figure increased to 42 percent for 11 to 30 days, and then increased to 56 percent for 31 to 74 days.

- **9th to 12th Grade.** Students with IEPs comprised 28 percent of all OSSs for 1 to 10 days. This figure increased to 40 percent for 11 to 30 days, and then increased to 43 percent for 31 to 74 days.

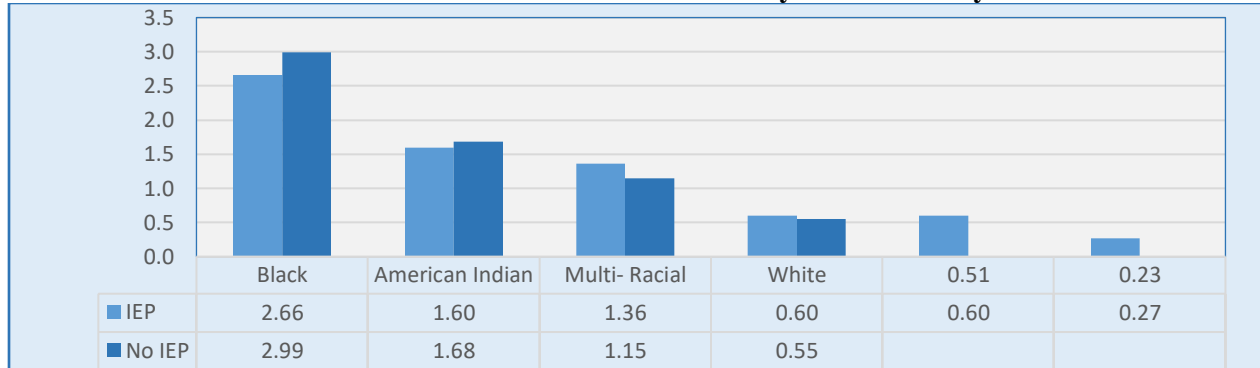
Exhibit 2u. Percent OSSs Comprise Students with IEPs by Grade and Total Number of OSS Days



Suspensions by Race/Ethnicity

Data in exhibit 2v show risk ratios for students with and without IEPs by race/ethnicity. Black students were more likely than other students to be suspended. The likelihood for Black students being suspended was higher among the without IEP group (2.99), however, than the IEP group (2.66). White, Hispanic, and Asian students with and without IEPs were least likely to be suspended.

Exhibit 2v. OSS Risk Ratios for Students with/without IEPs by Race/Ethnicity



IEP Suspensions by Race/Ethnicity and by Total Number of OSSs

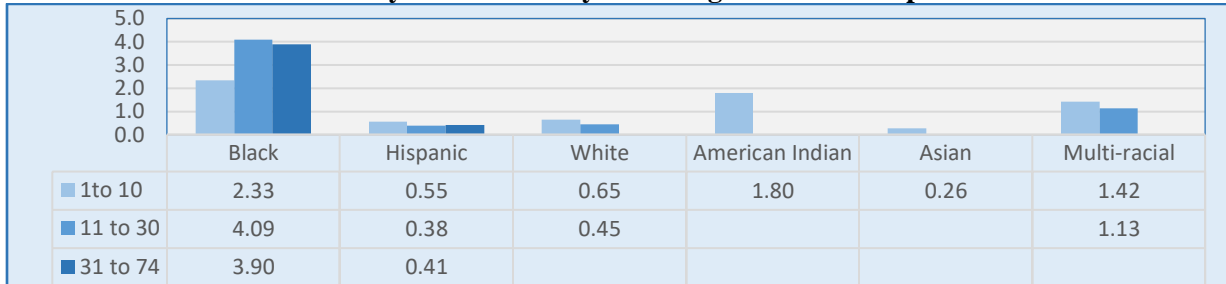
As shown in exhibit 2w, Black students with IEPs were much more likely than other students to be suspended in each range of total OSS days, and their likelihood of suspension was greatest for longer periods of OSS. Risk ratios were calculated among racial/ethnic groups with at least 10 suspended students in each of the three ranges of OSS total suspensions.

- **1 to 10 Days.** The risk ratio for Black students was 2.33, compared to American Indians and multi-racial students who had the next highest risk ratios of 1.80 and 1.42, respectively. All other risk ratios were below 0.65.
- **11 to 30 Days.** Black students' risk ratio of 4.09 was highest for OSSs of 11 to 30 days. By

comparison, the next highest risk ratio was 1.13 for multi-racial students. All other risk ratios were below 0.45.

- **31 to 74 Days.** Black students’ risk ratio of 3.90 for 31 to 74 OSS days was considerably higher than the Hispanic 0.41 risk ratio.

Exhibit 2w. OSS Risk Ratios by Race/Ethnicity and Length of Total Suspensions

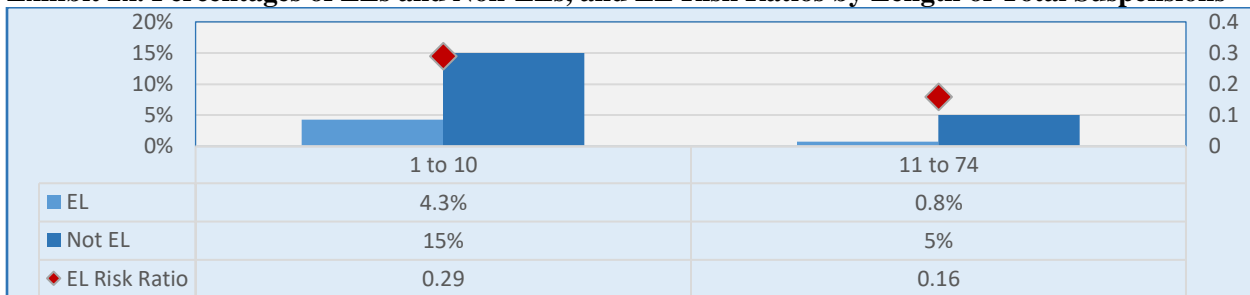


Suspensions of English Learners with IEPs

Overall, five percent of English learners (ELs) with IEPs were suspended, compared to 20 percent of non-EL students. This comparison produced a low 0.25 risk ratio for English learners.

Data in exhibit 2x show that a smaller percentage of ELs compared to non-ELs with IEPs were suspended for a total of 1 to 10 days (4.3 to 15 percent) and for 11 to 74 days (0.8 to 5 percent). These figures produced small risk ratios among EL students with IEPs in both categories of total OSS days: 0.29 (1 to 10 days), and 0.16 (11 to 74 days).

Exhibit 2x. Percentages of ELs and Non-ELs, and EL Risk Ratios by Length of Total Suspensions



Follow-up Study Questions – Out-of-School Suspensions

Study questions for a multidisciplinary group of OPS staff to consider around reducing the need for out-of-school suspensions (OSS) for students with disabilities include the following –

- Does OPS have a process in place for collecting and tracking data on OSS by various indicators of students with and without disabilities and for English learners like that shown in exhibits 2q–2w, and using cross-departmental personnel for review and follow-up?
- What factors might contribute to the following outcomes?
 - A 2.31 chance that students with IEPs would receive an OSS compared to students without IEPs. (Exhibit 2q)

- Very high OSS risk ratios for students with IEPs compared to those without IEPs at almost every grade, with the highest risk ratio being among kindergarteners. (Exhibit 2r)
 - Highest risk ratio for students with IEPs receiving an OSS of more than 30 days compared to 30 days or less. (Exhibit 2s)
 - Highest percentages of students with IEPs who receive an OSS of more than 30 days at kindergarten through third grades, and fourth through sixth grades. Highest percentage of students to receive an OSS of 11 to 30 days at kindergarten through third grades. (Exhibit 2t)
 - Black students were 2.6 times more likely and Black students with IEPs were 2.99 times more likely to receive an OSS compared to students from other races/ethnicities. (Exhibit 2u)
 - Black students with IEPs were much more likely than students from other race/ethnicities to receive an OSS for 11 to 30 days (4.09 risk ratio), 31 to 74 days (3.9 risk ratio), and 1 to 10 days (2.33 risk ratio). (Exhibit 2v)
 - English learners with IEPs were much less likely than ELs without IEPs to be suspended. (Exhibit 2w)
- In addition to the data referenced above, consider computing risk ratios for Black males and Black females (with and without IEPs) to address any significant disparities. For a complete picture, consider reviewing OPS data that could reveal other Black student/student with IEP disparities, such as for in-school suspensions 10 days or less and over 10 days, unexcused absences (by various numbers of days), graduation/ dropout, and achievement data.
 - Given the above OSS disparities for Black students, consider the context of the Black Lives Matter movement on suspensions, as well as any disproportionate impact of COVID-19-related experiences on Black families and students.
 - Based on these analyses, what are the educational and social/emotional strategies that OPS needs to use through MTSS to markedly advance social/emotional outcomes for all students, including those with IEPs, and particularly among Black students with/without IEPs. What are the training and human/material resources needed to carry out these strategies?

AREAS OF STRENGTH

The following are OPS areas showing positive data on students with disabilities in the areas of achievement, postsecondary transition, and suspension.

- **State Assessment Participation Rate.** Except for two years between 2014-15 and 2018-19, the district exceeded the federally required 95 percent participation rates on alternative assessments. In 2018-19, disability participation rates for reading and math at each grade level ranged from 99.46 to 97.83 percent. (Exhibit 2h)
- **Reading/ELA** proficiency figures increased from 16 percent (2016-17) to 31 percent (2018-19). Note: the last figure dropped from the 33 percent figure in 2017-18. (Exhibit 2g)
- **Graduation Rate.** Based on OPS data between 2014-15 and 2018-19, the graduation rate

increased from 56 percent to 60 percent. (Exhibit 2l) However, the NDE Performance Report revealed an increase from 62 percent to 80 percent over the same period. (Exhibit 2m)

- **Dropout Rate.** Based on OPS data, between 2014-15 and 2018-19 the dropout rate decreased from 2.66 percent to 0.94 percent. (Exhibit 2m) Note that the NDE Performance Report showed the rate increased from 3.21 percent to 3.27 percent over the same period.
- **ELs and OSS.** English learners with IEPs were much less likely than ELs without IEPs to be suspended. (Exhibit 2x)

OPPORTUNITIES FOR IMPROVEMENT

The following are OPS opportunities for improvement related to achievement, postsecondary transition, and suspension of students with disabilities.

Young Children Achievement Outcomes

- **Growth.** Low achievement compared to the state and to state targets among OPS children who entered an early-childhood program below developmental expectations for their age, but who substantially increased developmentally by age six when they exited the program. (Exhibit 2a)
- **Met Expectations.** Low achievement compared to the state and to state targets among OPS children who functioned within expectations by age six or who attained those expectations by the time they exited the program. (Exhibit 2b)

School-aged Achievement on Statewide Assessments

- Percent of students with disabilities at/above proficiency on reading/ELA increasing in 2017-18 (33 percent) and decreasing in 2018-19 (31 percent), and flat in math from 2016-17 to 2018-19 (30 percent). (Exhibit 2g)
- OPS proficient reading and math scores below state and SPP targets at the elementary, middle, and high school levels. (Exhibit 2i – 2j) This NPS Performance Report Data showed scores below those reported by OPS. (Exhibit 2g)
- Some 1.5 percent of students taking an alternate assessment, which is above the federal one percent standard that requires OPS to submit a waiver request to NDE to justify the difference. (Text associated with exhibit 2k.)
- Mid-level proficiency rates for OPS students taking an alternate assessment. (Exhibit 2k)

Graduation/Dropout Rates

- Slow increase between 2014-15 and 2018-19 in the percentage of students with disabilities who graduated with a regular diploma (56 percent to 60 percent) and a slow decrease in the OPS graduation gap among students with disabilities with all students. (Exhibit 2l)
- Flattening of percentage points between OPS disability graduation rates and SPP targets from 2016-17 to 2018-19. (Exhibit 2l)
- Higher OPS disability dropout rates on the NDE Performance Report (exhibit 2o) compared to OPS data (exhibit 2n) between 2014-15 and 2018-19. (Exhibit 2n)

- Continuous OPS disability dropout rates above SPP target and state rates. (Exhibit 2o)

Secondary Transition

- Smaller IEP transition compliance rates from 2013-14 (100 percent) to 2018-19 (48 percent), compared to increased state rates (77 percent to 95 percent). (Exhibit 2p)
- Decrease from 2013-14 to 2018-19 on percentages of students with disabilities enrolled in higher education, competitively employed, or in another postsecondary education or training program (78 percent to 40 percent), and an increase in percentage points below SPP targets (5 percentage points to 44 percentage points). (Exhibit 2q)

Out-of-School Suspensions

- Students with IEPs were 2.31 times more likely than students without IEPs to receive an OSS. (Exhibit 2r)
- Very high OSS risk ratios for students with IEPs compared to those without IEPs at almost every grade, with the highest risk ratio among kindergarteners (6.1 risk ratio). (Exhibit 2s)
- Highest risk ratios among students with IEPs to receive an OSS for more than 30 days (2.44 risk ratio) compared to 30 days or less. (Exhibit 2t)
- Highest percentages of students with IEPs to receive an OSS for more than 30 days at kindergarten through third grades and fourth through sixth grades (60 percent and 76 percent, respectively). Highest percentages of students to receive an OSS of 11 to 30 days at kindergarten through third grades (77 percent). (Exhibit 2u)
- Black students were 2.99 times more likely and Black students with IEPs were 2.66 times more likely to receive an OSS compared to students from other races/ethnicities. (Exhibit 2v)
- Black students with IEPs were more likely than students from other races/ethnicities to receive an OSS of 11 to 30 days (4.09 risk ratio), 31 to 74 days (3.9 risk ratio), and 1 to 10 days (2.33 risk ratio). (Exhibit 2w)

III. EDUCATIONAL ENVIRONMENTS OF LEARNING

This section of the Council team’s report focuses on research and OPS data pertaining to the education of students in various educational environments.

Research Supporting Inclusive Instruction Effectiveness

An abundance of research is available on effective school practices. As a multi-tiered system of supports provides a foundation for high quality instruction and social/emotional well-being for all students, the structure must also support and enhance inclusive education to promote higher achievement and well-being for students with disabilities. An example of this research comes from Duval County, FL. This Council-member school district posted the highest NAEP basic and above rates of all TUDA districts in both reading and math at grades 4 and 8. For instruction in general education classes at least 80 percent of the time, 82 percent of Duval County students are educated in this setting (30 percentage points higher than OPS’s rate and 18 points higher than the nation’s rate). At the same time, 13 percent of Duval County students are educated in separate classrooms more than 60 percent of the time, compared to OPS’s rate of 20 percent.

Focus on Young Children

“Most 3- to 5-year-olds with disabilities learn best when they attend preschools alongside their age-mates without disabilities to the greatest extent possible. These settings provide both language and behavioral models that assist in children’s development and help all children learn to be productively engaged with diverse peers.”²³

Studies have shown that when young children with disabilities are included in the regular classroom setting, they demonstrate higher levels of social play; are more likely to initiate activities; and show substantial gains in key skills—cognitive skills, motor skills, and self-help skills. Participating in activities with typically developing peers allows children with disabilities to learn through modeling, and this learning helps them prepare for the real world. Researchers have found that typically developing children in inclusive classrooms are better able to accept differences and are more likely to see their classmates achieving despite their disabilities. They are also more aware of others’ needs.²⁴ The importance of inclusive settings is underscored by the federal mandate, which requires that the extent to which young children (three to five years of age) receive most of their services in regular early childhood programs is included as a state performance-plan indicator.

²³ California’s Statewide Task Force on Special Education, *One System: Reforming Education to Serve ALL Students*, March 2015, retrieved from <http://www.smcoe.org/assets/files/about-smcoe/superintendents-office/statewide-special-education-task-force/Task%20Force%20Report%205.18.15.pdf>.

²⁴ Ronnie W. Jeter, “The Benefits of Inclusion in Early Childhood Programs,” retrieved from <http://www.turben.com/article/83/274/The-Benefits-of-Inclusion-in-Early-Childhood-Programs>.

Schoolwide Integrated Framework

The Schoolwide Integrated Framework for Transformation (SWIFT) Center summarized succinctly the elements needed to give students a foundation of learning that would help them build a career later in life.

Thirty years of research shows us that when all students are learning together (including those with the most extensive needs) AND are given the appropriate instruction and supports, ALL students can participate, learn, and excel within grade-level general education curriculum, build meaningful social relationships, achieve positive behavioral outcomes, and graduate from high school, college and beyond. How do we transform education to achieve these goals? According to the research, it takes administrative leadership, multi-tiered systems of support, family and community partnership, an inclusive educational framework, including organizational structure and school culture, and policies and practices providing the backbone to these features.²⁵

Research posted by the SWIFT Center shows that inclusive education benefits all students.²⁶ Some of the research specifies that--

- Time spent engaged in the general education curriculum is strongly and positively correlated with math and reading achievement for students with disabilities.
- Students with autism in inclusive settings scored significantly higher on academic achievement tests when compared to students with autism in self-contained settings.
- Students without disabilities made significantly greater progress in reading and math when served in inclusive settings.
- Students who provided peer supports for students with disabilities in general education classrooms demonstrated positive academic outcomes, such as increased academic achievement, assignment completion, and classroom participation.

The Center has also published research supporting the SWIFT domains and core features: administrative leadership; multi-tiered system of supports; integrated education framework; family and community engagement; and inclusive policy structures and practices.²⁷

Massachusetts Study

A comprehensive study of school districts in Massachusetts found that students with IEPs educated in general education classrooms at least 80 percent of the school day appeared to

²⁵ The SWIFT Center, which is associated with the University of Kansas, received grants from the U.S. Department of Education totaling more than \$41 million to help states, districts, and schools make sure all children, including students of color and those with disabilities, have access to all that education has to offer. Retrieved from <https://iod.unh.edu/sites/default/files/media/InclusiveEd/researchsupport-final.pdf>.

²⁶ *Id.* The posting includes all research citations and full references.

²⁷ *Id.*

outperform similar students who were not included to the same extent in general education classrooms with their non-disabled peers. On average, these students earned higher scores on the statewide assessment (MCAS), graduated high school at higher rates, and were more likely to remain in their local school districts longer than students who were educated in substantially separate placements 40 percent or less of the day in a general education classroom. These findings were consistent across elementary, middle, and high school years, as well as across subject areas.²⁸

National Longitudinal Transition Study-2

Similarly, the 10-year National Longitudinal Transition Study-2 (NLTS 2) found that, while more time spent in general education classrooms was associated with lower *grades* for students with disabilities, compared to their non-disabled peers, students who spent more time in general settings were closer to grade level on standardized math and language *tests* than were students with disabilities who spent more time in separate settings.²⁹

Common Core State Standards Visionary Statement

A fundamental goal of the Common Core State Standards (CCSS) was to create a culture of high expectations for all students. In a statement on the application of the common core to students with disabilities, the CCSS website includes a visionary statement that reinforces this intent:

Students with disabilities ... must be challenged to excel within the general curriculum and be prepared for success in their post-school lives, including college and/or careers.” These common standards provide historic opportunity to improve access to rigorous academic content standards for students with disabilities.³⁰

The statement underscores the supports and accommodations that students with disabilities need to meet high academic standards and fully demonstrate their conceptual and procedural knowledge and skills in ELA (reading, writing, speaking, and listening) and mathematics. These expectations for students with disabilities include the following elements:

- ***Instruction and related services*** designed to meet the unique needs of students with disabilities and enable them to access the general education curriculum.
- ***Teachers and specialized instructional support personnel*** who are prepared and qualified to

²⁸ Thomas Hehir & Associates (2014, August) Review of Special Education in the Commonwealth of Massachusetts: A Synthesis Report, Boston, Massachusetts, retrieved at <http://www.doe.mass.edu/sped/hehir/2014-09synthesis.pdf>

²⁹ This research was based on the characteristics, experiences, and outcomes of a nationally representative sample of more than 11,000 youth ages 13 through 16 who were receiving special education services in grade seven or above when the study began in 2001. Review of Special Education in the Houston Independent School District, Thomas Hehir & Associates Boston, Massachusetts, page 25, retrieved at http://www.houstonisd.org/cms/lib2/TX01001591/Centricity/Domain/7946/HISD__Special_Education_Report_2011_Final.pdf.

³⁰ Retrieved at <http://www.corestandards.org/assets/application-to-students-with-disabilities.pdf>.

deliver high-quality, evidence-based, and individualized instruction and support.

- ***Instructional supports for learning*** that are based on principles of universal design for learning (UDL), which fosters student engagement by presenting information in multiple ways and allowing diverse avenues of action and expression.³¹
- ***Instructional accommodations*** that reflect changes in materials (e.g., assistive technology) or procedures that do not change or dilute the standards but allow students to learn within the CCSS framework.

The general education curriculum refers to the full range of courses, activities, lessons, and materials routinely used by the general population of a school. Students with IEPs have access to this curriculum when they are actively engaged in learning the content and skills that are being taught to all students. To participate with success in the general curriculum, students may need additional services, such as instructional supports, accommodations, scaffolding, assistive technology, and other services. With a universal design for learning (UDL) approach, information is presented in varied ways, allowing multiple avenues for learning and expression.

When special educators teach students from multiple grades in a single self-contained class, it is difficult for them to focus on each grade's content standards with any depth or effectiveness. When schools are organized in an inclusive manner, on the other hand, they are better able to support students with various disabilities and enable them to attend the school they would otherwise attend if not disabled. This model enables more students with disabilities to attend schools in their community, supports a more natural distribution of students with disabilities at each school, and reduces transportation time and costs. Still, general education instruction must be meaningful for students with disabilities, and their presence in the classroom, alone, is insufficient to make it so.

Review of Data

Through several state performance plan (SPP) indicators, the U.S. Department of Education and NDE measures various educational settings for young children who are 3 through 5 years of age, and for students who are 6 through 21 years of age.

Two settings are measured for young children –

- Majority of time receiving special education in early childhood (EC) classes; and
- Enrollment in special day and residential schools attended solely by students with IEPs.

Three settings are measured for the second group of students in –

- Regular classes 80 percent or more of the day;

³¹ UDL is defined as “a scientifically valid framework for guiding educational practice that (a) provides flexibility in the ways information is presented, in the ways students respond or demonstrate knowledge and skills, and in the ways students are engaged; and (b) reduces barriers in instruction, provides appropriate accommodations, supports, and challenges, and maintains high achievement expectations for all students, including students with disabilities and students who are limited English proficient.” by Higher Education Opportunity Act (PL 110-135). See the National Center on Universal Design for Learning at <http://www.udlcenter.org/>.

- Regular classes less than 40 percent of the day, i.e., in separate classes; and
- Separate day/residential schools.

States are expected to collect data on a fourth educational setting (i.e., students in regular classes between 79 percent and 40 percent of the time), but the SPP indicator does not monitor this setting.

The Council team reviewed two sources of data relevant to these educational placement analyses: NDE’s performance report for OPS, which is associated with the SPP; and raw data OPS provided to the Council team. The OPS data included educational placement figures overall, by disability area, by grade, and by race/ethnicity. In several areas, these two data sources for the same indicators were significantly different.

Educational Environments for Young Children with Disabilities

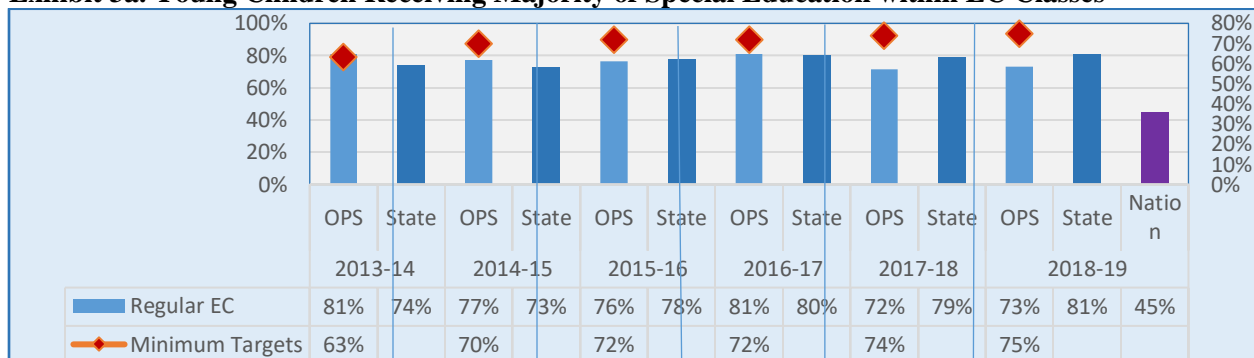
Of the 6,822 children receiving education in half or full day pre-kindergarten (PK), or kindergarten, 23 percent (1,564) received special education. Most of these children (60 percent) had a developmental disability. SPP indicators measure the amount of time children three to five years of age receive special education in two areas: in regular early childhood classes most of the time; and in separate classes most of the time and in separate schools.

Majority of Special Education Instruction Provided in Early Childhood Environment

NDE Performance Report

In 2013-14, 81 percent of OPS children received most of their special education in regular EC classes, compared to 74 percent of Nebraska children. By 2018-19, OPS and state proportions reversed (73 percent and 81 percent, respectively). From the beginning to the end of this period, the state’s minimum target increased from 63 percent to 75 percent. OPS exceeded the earlier target by 18 percentage points but missed the 2018-19 state target by 2 percentage points. It is noteworthy that both OPS and state rates far exceeded the nation’s average of 45 percent in 2018-19 for this educational setting.³² (See exhibit 3a.)

Exhibit 3a. Young Children Receiving Majority of Special Education within EC Classes



³² Federal and state data for all educational settings were retrieved from <https://www2.ed.gov/programs/osepidea/618-data/static-tables/index.html#partb-cc>.

OPS Data

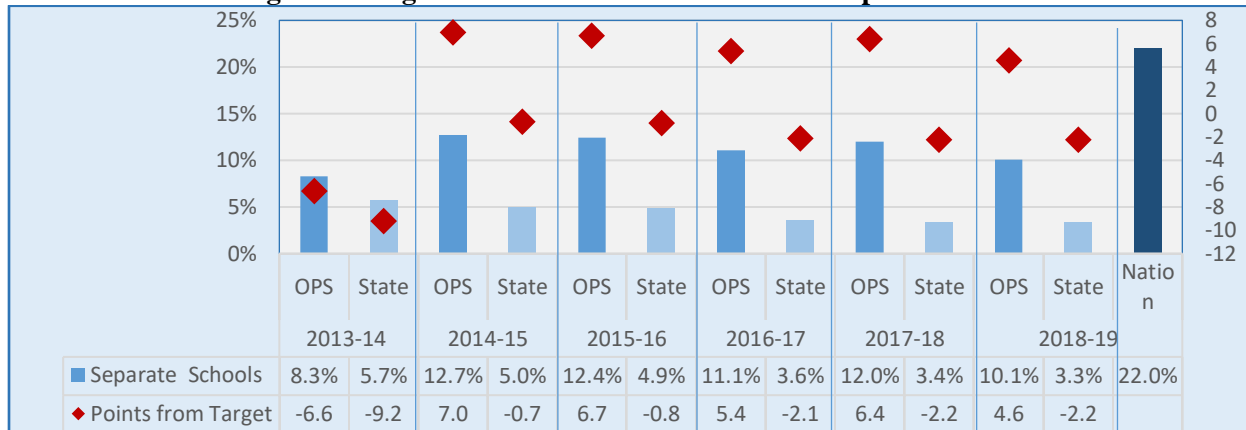
Based on OPS data, in 2018-19, only 59 percent of young children received special education instruction in regular early childhood classes most of the day. This percentage was much less than the 73 percent figure in the ND Performance Report.

Education in Separate Classes/Schools

NDE Performance Report

From 2013-14 to 2018-19, OPS’ percentages of students placed in separate classes/schools increased from 8.3 percent (6.6 percentage points below the maximum state target) to 10.1 percent (4.6 percentage points below the state target). Between these two years, OPS rates were highest in 2014-15 (12.7 percent) and 2015-16 (12.4 percent). During the six years of data, state percentages were consistently lower than OPS figures, and fell from 5.78 percent (2013-14) to 3.3 percent (2018-19). In 2018-19, both OPS and state rates were far below the national rate of 22.0 percent for this educational setting. (See exhibit 3b.)

Exhibit 3b. Percentage of Young Children with IEPs Educated in Separate Classes/Schools



OPS Data

Based on OPS data, 27 percent of young children received special education instruction in separate classes most of the time or in separate schools. This was a much larger percentage than the 10.1 percent figure included in the NDE Performance Report and it was above the national rate of 22 percent.

Follow-up Study Questions – Educational Environments for Young Children

Study questions for a multidisciplinary group of OPS staff on the extent to which children three to five years of age receive special education/related services in their early childhood classrooms nondisabled peers for most of the time might include the following –

- Does OPS have a process in place for collecting and tracking data on young children educated inclusively with their nondisabled peers or in separate classes/schools (such as shown in exhibits 3a-3b, along with associated text) and using cross-departmental personnel for review

and follow-up?

- What factors might contribute to the following outcomes?
 - A trend toward smaller percentages of children educated inclusively from 2013-14 to 2018-19 (81 percent to 73 percent), which never met minimum SPP targets. (Exhibit 3a)
 - NDE Performance Report for 2018-19 with 73 percent of OPS children receiving most of their special education in early childhood classes compared to 59 percent reported by OPS. (Exhibit 3a and OPS data text.)
 - Trend toward larger percentages of young children educated in separate classes/schools from 2013-14 to 2017-18, (8.3 percent to 10.1 percent, after a high of 12.7 percent in 2014-15). OPS figures were consistently higher than state percentages, and they were above SPP targets.
 - In 2017-18, OPS data reported a much higher 27 percent of students in this educational environment than did NDE (10.1 percent report). (Exhibit 3b) The national average is 22 percent for this educational setting.
 - Even though OPS young children are educated with their nondisabled peers at a far greater rate than their peers nationally, the achievement outcomes for OPS children are far below state averages and SPP targets. (Exhibits 2a and 2b)
- What accounts for differences between OPS and NDE Performance Report data for this indicator?
- What strategies, training, and human/material resources are needed to improve achievement outcomes for OPS young children with disabilities and meet SPP targets? What does OPS also need to consider regarding the learning and social/emotional experiences of young children who received varying instruction during the 2019-20 school year and the experiences of newly enrolled children whose lives were changed because of COVID-19?

Educational Environments for School-Aged Students with Disabilities

SPP indicators measure three educational environments for students who are 6 through 21 years of age: in general education 80 percent or more of the time; in general education less than 60 percent of the time (roughly equivalent to self-contained classes); and in special schools attended solely by students with disabilities. In addition to data included in the NDE Performance Report, OPS provided data that is disaggregated by disability area, grade, and race/ethnicity.

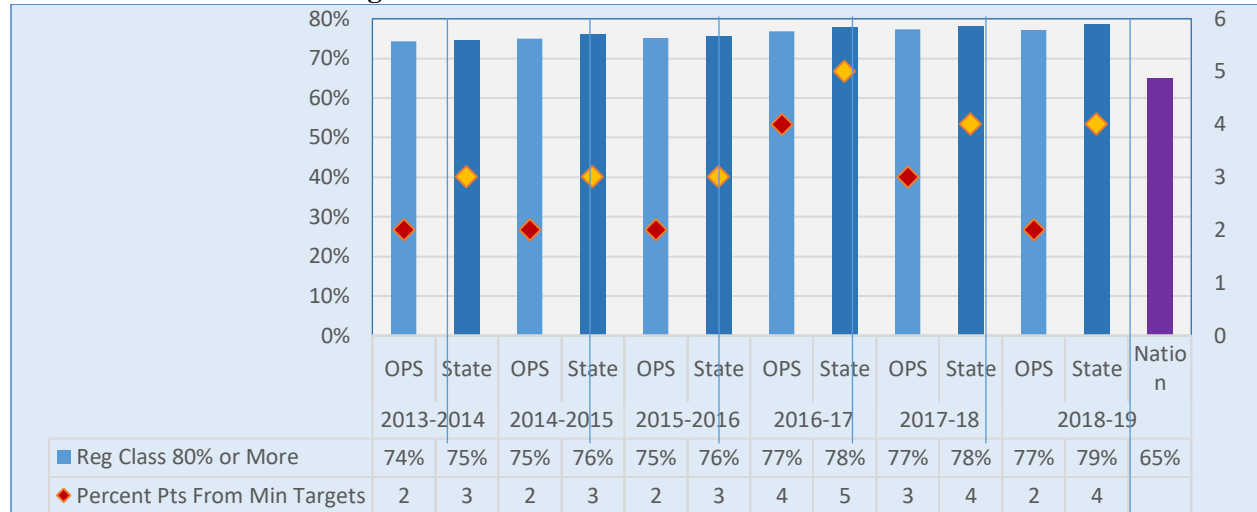
Overall Data for Students Provided Education in Inclusive Classes

NDE Performance Report Data

Data in exhibit 3c show the percentages of OPS and state students educated in regular classes at least 80 percent of the time in 2013-14 through 2018-19, and their respective percentage point differences from state targets. In 2013-14, 74 percent of OPS children were educated in this setting, compared to 75 percent of Nebraska children. (See exhibit 3c.) By 2018-19, OPS and state figures both increased to 77 percent and 79 percent, respectively. From 2013-14 to 2018-19, the

state’s minimum target increased from 72 percent to 75 percent. During this period, OPS exceeded the minimum targets by 2 to 4 percentage points. Both OPS and state rates were above the 2018-19 national average of 65 percent for this educational setting.

Exhibit 3c. Instruction in Regular Classes At Least 80 Percent of the Time



OPS Data

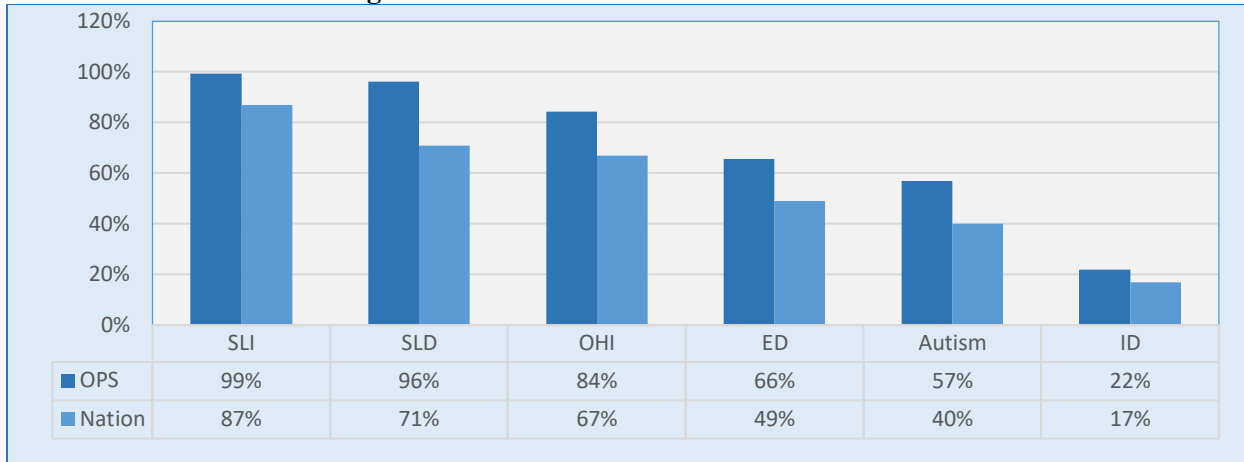
Data for the 2018-19 school year that OPS provided to the Council team showed that 82 percent of the district’s students were educated in regular classes at least 80 percent or more of the time. This figure was 5 percentage points higher than the 77 percent cited in the NDE Performance Report.

Educational Settings by Most Common Disability Areas

Comparing district and national data for children educated in regular classes at least 80 percent of the time by the most common six disability areas, OPS figures exceeded national data for every disability area. (See exhibit 3d.)

- **SLI.** A very high 99 percent of OPS students with a speech/language impairment were educated in this setting, which was 12 percentage points higher than the national figure.
- **SLD.** Almost all (96 percent) OPS students with a specific learning disability were educated in this setting, which was 25 percentage points higher than the national figure.
- **OHI, ED and Autism.** With 84 percent of OPS students with an other health impairment, 66 percent of students with emotional disturbance, and 57 percent of students with autism educated in this setting, these figures were each 17 percentage points higher than national figures.
- **ID.** With 22 percent of OPS students with an intellectual disability educated in this setting, the rate was 5 percentage points higher than the national figure.

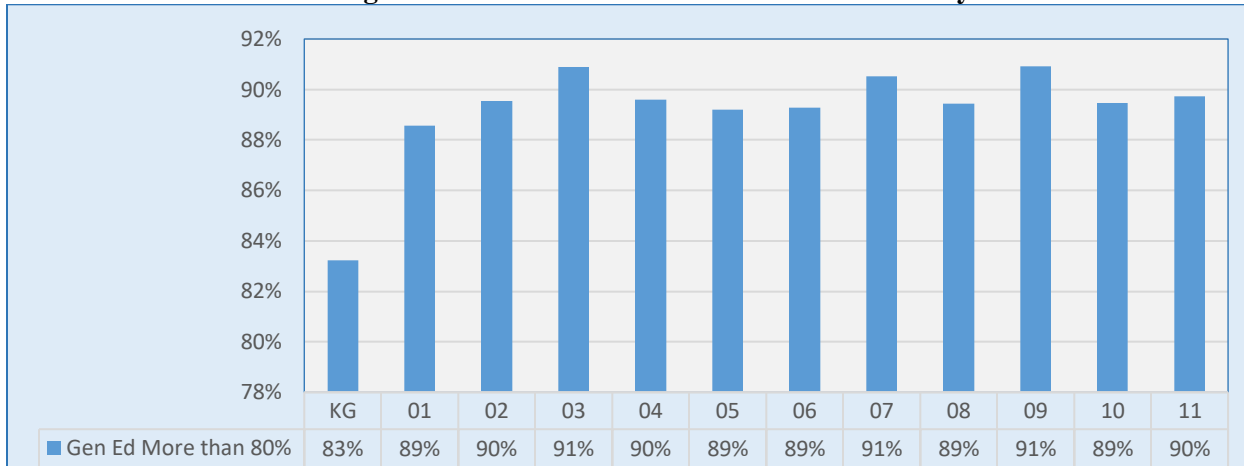
Exhibit 3d. Instruction in Regular Classes At Least 80 Percent of the Time



OPS Data by Grade

As shown in exhibit 3e, the percentage of students educated in regular classes at least 80 percent of the time was lowest among kindergarteners (83 percent). At all other grades, the percentages varied slightly (from 89 percent to 91 percent.)³³

Exhibit 3e. Instruction in Regular Classes At Least 80 Percent of the Time by Grade



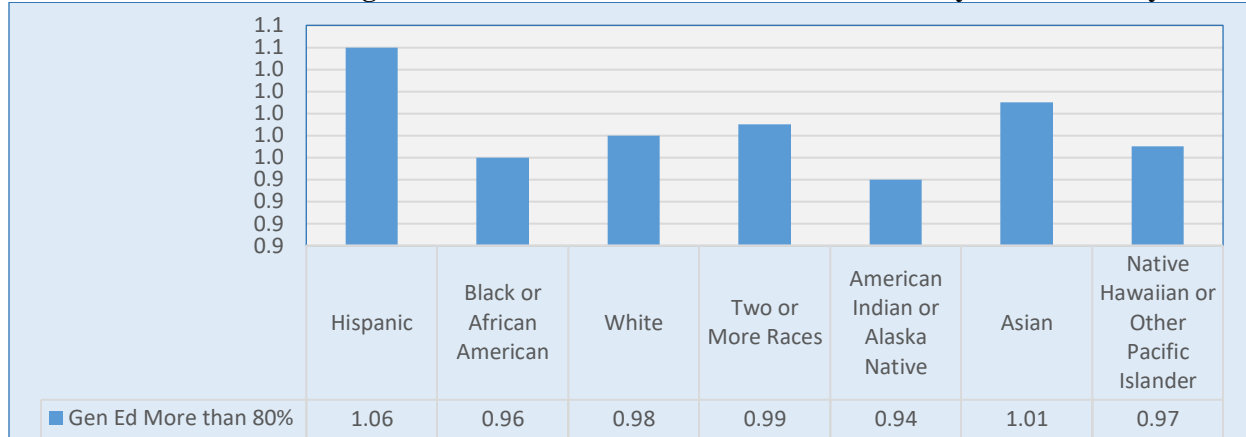
OPS Data by Race/Ethnicity

When using a risk ratio to measure the likelihood that students from one race/ethnicity would be educated in general education at least 80 percent of the time compared to other students, with “1” representing total proportionality, OPS data deviated from this figure by only plus/minus

³³ For all charts in this section that provide educational environment percentages by grade, the twelfth grade is not included because this grade includes students that remain in school past the age of 18 years, which skews the data as a higher percentage of these students are educated apart from their nondisabled peers to receive transitional services.

.06 or less for each racial/ethnic group of students, showing a very high degree of proportionality. (See exhibit 3f.)

Exhibit 3f. Instruction in Regular Classes At Least 80 Percent of the Time by Race/Ethnicity



Education in Self-Contained Classes

The provision of special education instruction for students in self-contained classes is often predicated on the theory that students with common characteristics can be matched to a specific program. Such programs often include students with a range of achievement and behavior, as well as students with characteristics that fall between program types. Such specialization can sometimes perpetuate the myth that student needs can be met with correct program matches based on a prescribed set of characteristics. If a student is failing, then it is often presumed to be because he or she is simply in the wrong program, so a new one is sought to provide a better fit. In such circumstances, there is pressure to create more specialized programs rather than creating a broader framework for general-education instruction and behavioral supports. Furthermore, students are sometimes required with this kind of specialization to transfer from the school he or she would otherwise attend to another school housing the program identified for the student. If that school does not have classes at each grade level, the student then must transfer to another school. As a result, students having difficulty in transitioning are required to transfer more frequently than other students.

The following subsections address students educated in self-contained placements, which the SPP measures as instruction in regular classes less than 40 percent of the time.

Overall Data for Inclusive Instruction

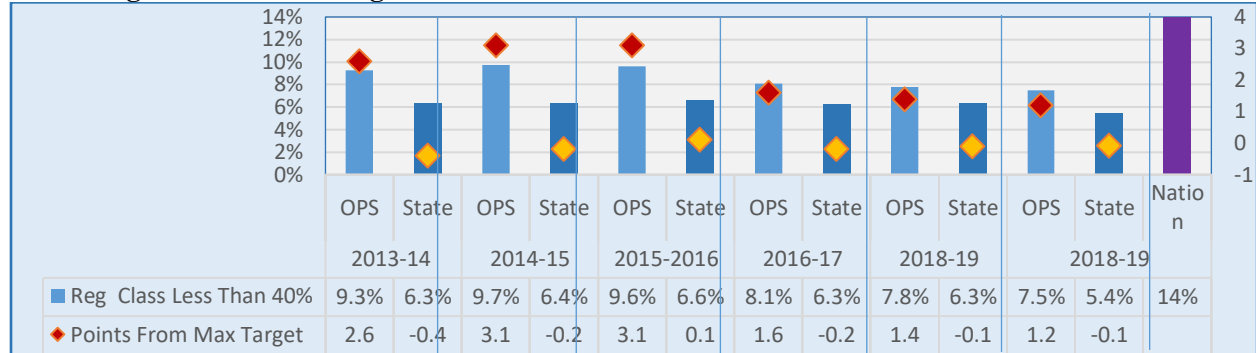
NDE Performance Report

In 2013-14, 9.3 percent of OPS children were educated in special classes compared to 6.3 percent of Nebraska children. (See exhibit 3g.) By 2018-19, OPS and state figures each decreased to 7.5 percent and 5.4 percent, respectively. From 2013-14 to 2018-19, the state’s maximum target decreased from 6.7 percent to 6.3 percent. During this period, OPS percentages decreased from

Improving Special Education Services in the Omaha Public Schools

2.6 percentage points to 1.2 percentage points above the SPP maximum targets. Both OPS and state rates were far below the 2018-19 national rate of 14 percent for this educational setting.

Exhibit 3g. Instruction in Regular Classes Less than 40 Percent of the Time



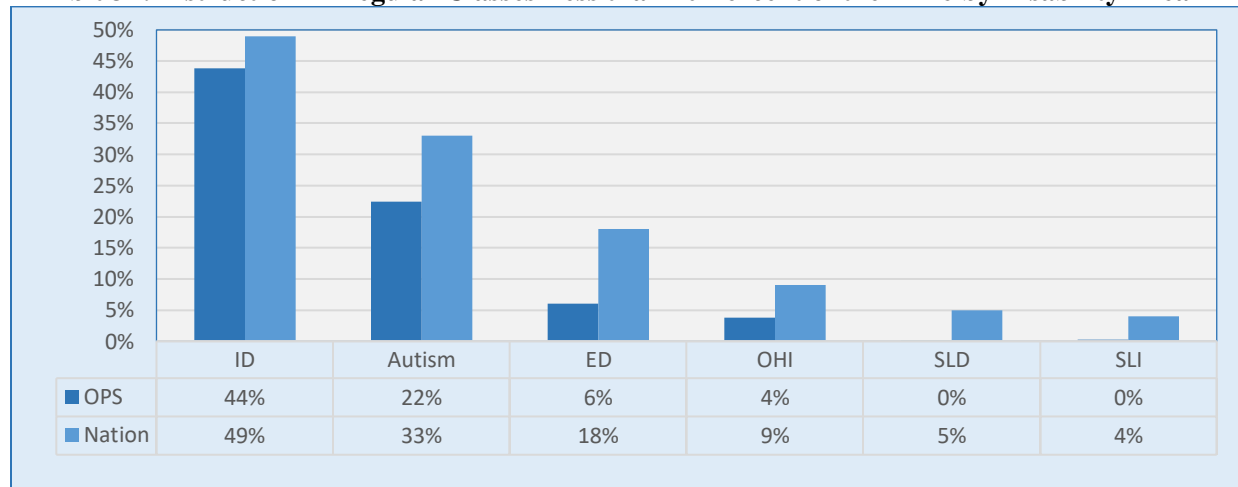
OPS Data

Based on district data provided to the Council team, 7.1 percent of OPS students were educated in special classes during the 2018-19 school year. This rate was like the 7.5 percent rate included in the NDE Performance Report.

OPS and National Data by Disability Area

In every one of the six most common disability categories, OPS students are educated in regular classes less than 40 percent of the time at rates that are lower than those at the national level. (See exhibit 3h.) State and national differences were highest in the areas of emotional disturbance (6 percent and 18 percent, respectively), and autism (22 percent and 33 percent, respectively). OPS figures for intellectual disability (44 percent), other health impairment (4 percent), and specific learning disabilities (0 percent) were 5 percent lower than national rates for this educational environment. OPS students with a speech/language impairment were not educated in this setting, compared to 4 percent at the national level.

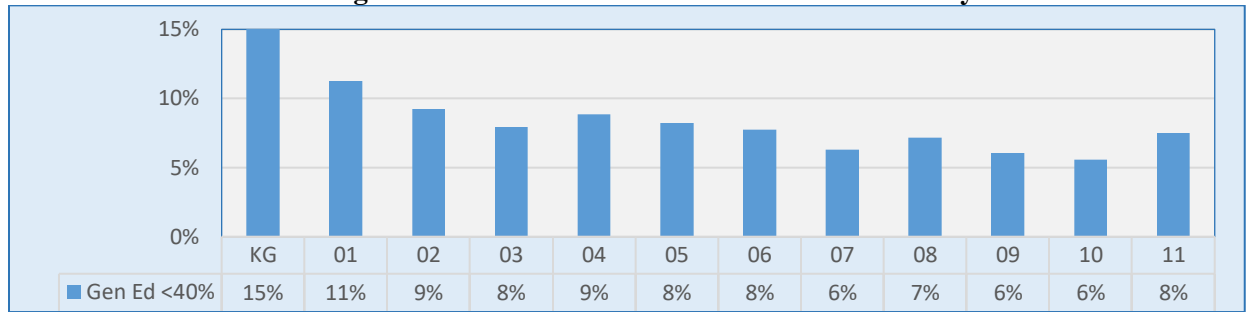
Exhibit 3h. Instruction in Regular Classes Less than 40 Percent of the Time by Disability Area



OPS Data by Grade

Among students educated in self-contained classes, the percentage of students with disabilities fell from a high of 15 percent (kindergarten) to 11 percent (first grade). (See exhibit 3i.) Between second and eleventh grades, the figures generally ranged between 9 percent (grades 2 and 4) and 6 percent (grades 7, 9, and 10), with no apparent pattern or trend.

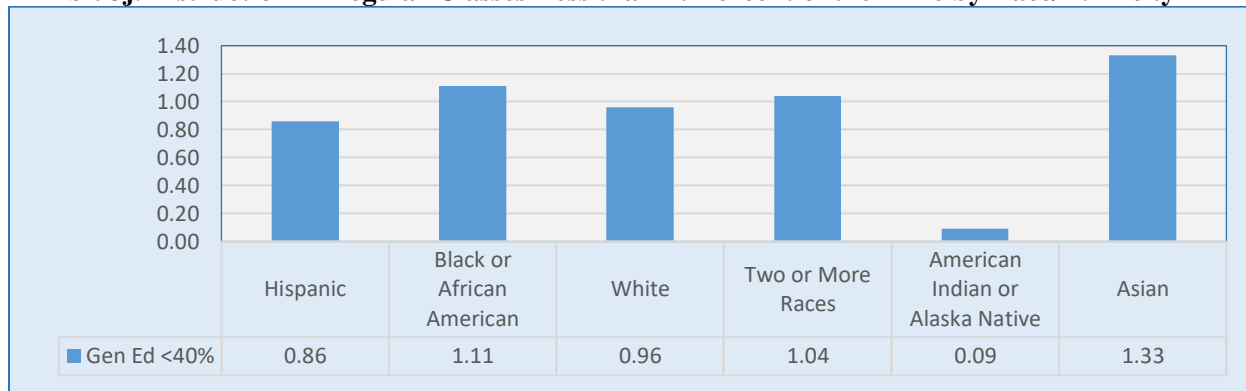
Exhibit 3i Instruction in Regular Classes Less than 40 Percent of the Time by Grade



OPS Data by Race/Ethnicity

Risk ratios by race/ethnicity varied somewhat for students educated in self-contained classes. (See exhibit 3j.) Asian students had the highest risk ratio (1.33) and Hispanic students had the lowest risk ratio (0.86).³⁴ No racial/ethnic group had a risk ratio that was disproportionate.

Exhibit 3j. Instruction in Regular Classes Less than 40 Percent of the Time by Race/Ethnicity



Separate Schools

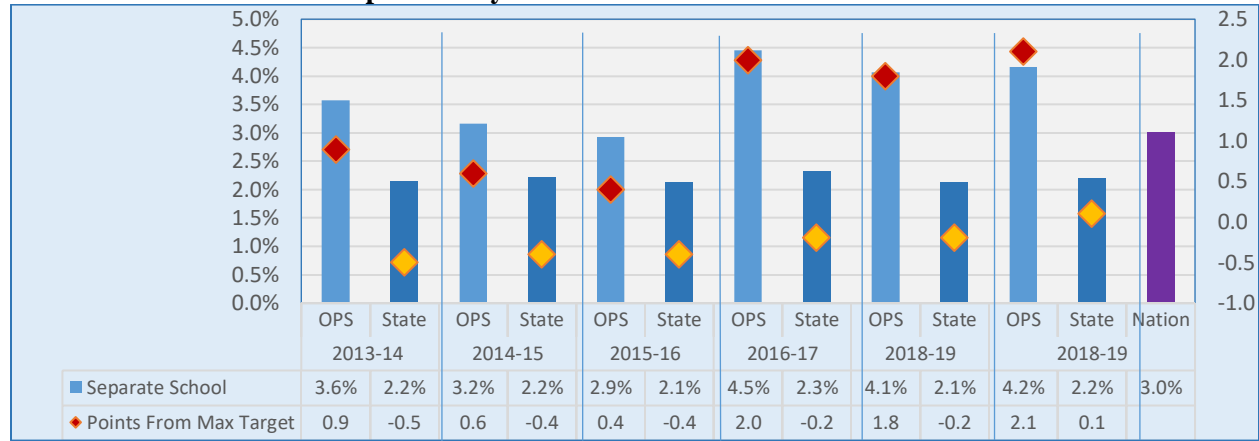
When an IEP team decides that a student needs a separate school that exclusively enrolls students with disabilities, the decision reflects a placement that provides the most restrictive educational environment for the student. According to an OPS representative, data on students educated in separate schools pertain to their “primary” placement, and some of these students attend regular schools for varying portions of the day.

³⁴ For charts showing risk ratios by race/ethnicities, only those with an adequate number or cell size are shown.

NDE Performance Report

From 2013-14 to 2018-19, OPS’ percentages of students educated in separate schools increased from 3.6 percent (0.8 percentage points below the maximum state target) to 4.2 percent (2.0 percentage points below the state target). Between these two years, OPS’ rates varied from a low of 2.9 percent (2015-16) to a high of 4.5 percent (2016-17). During the six years of data, state percentages were consistently lower than OPS figures. In 2018-19, OPS’s rate of 4.2 percent was higher than the nation’s 3.0 percent and the state’s 2.2 percent average. (See exhibit 3k.) In this category, the 2018-19 NDE Performance Report figure of 4.2 percent was about the same as the 4.0 percent that OPS reported.

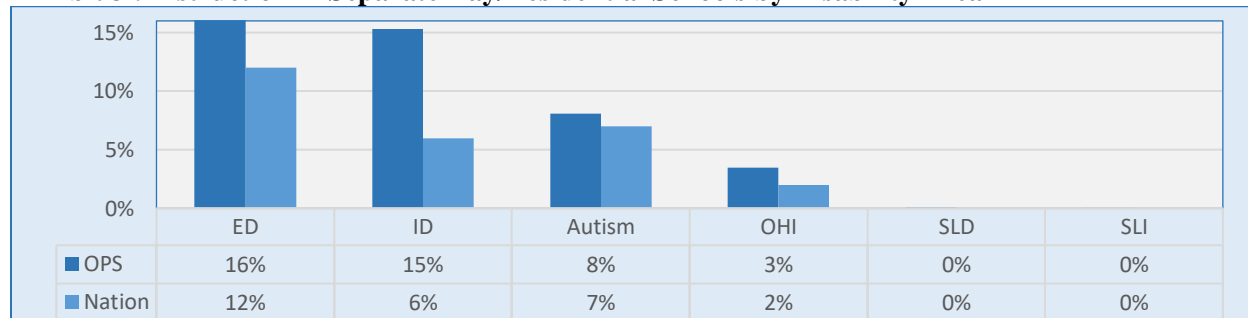
Exhibit 3k. Instruction in Separate Day/Residential Schools



OPS and National Data by Disability Area

When looking at OPS students with the six most common disabilities, except for specific learning disabilities and speech/language impairment, OPS students were educated in separate schools at rates higher than national figures. (See exhibit 3l). Differences between OPS and national rates were larger in the areas of emotional disturbance (16 percent and 12 percent, respectively) and intellectual disability (15 percent and 6 percent, respectively). OPS and national figures were closer for autism (8 percent and 7 percent, respectively) and other health impaired (3 percent and 2 percent, respectively). Both the district and the nation had rates rounding to 0 percent among students with a specific learning disability or speech/language impairment who were educated in this setting.

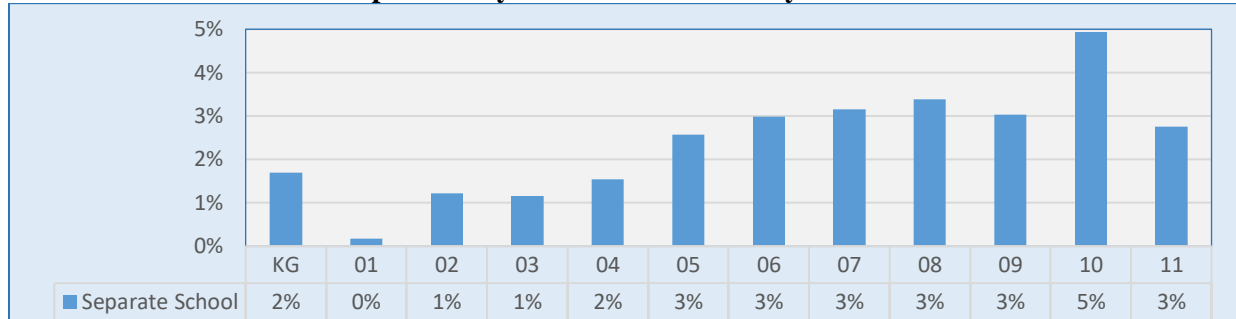
Exhibit 3l. Instruction in Separate Day/Residential Schools by Disability Area



OPS Data by Grade

Percentages of OPS students educated in separate schools varied by grade. The kindergarten figure of 2 percent fell to 0 percent at first grade, increased to 1 percent at second and third grade, and then increased again to 2 percent in fourth grade. From fifth through ninth grade and again at eleventh grade the figure increased to 3 percent. Tenth grade had the highest rate at 5 percent. (See exhibit 3m.)

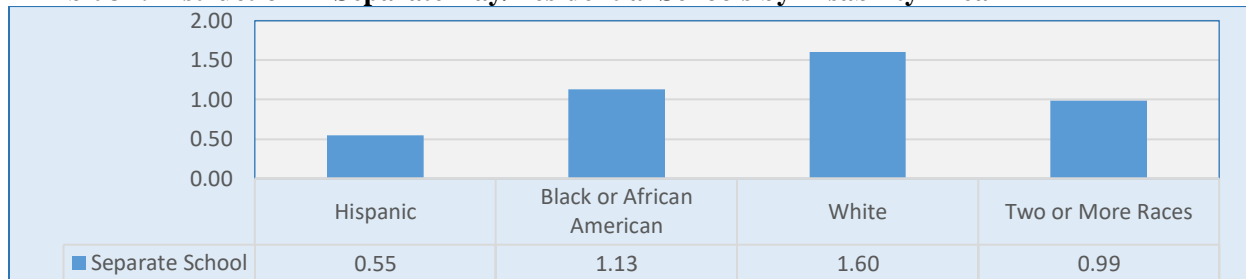
Exhibit 3m. Instruction in Separate Day/Residential Schools by Grade



OPS Data by Race/Ethnicity

Although not significantly disproportionate, white students were 1.60 times more likely than other students to be educated in a separate school. The risk ratios were lower among Hispanic students (0.55), Black students (1.13), and multi-racial students (0.99). (See exhibit 3n.)

Exhibit 3n. Instruction in Separate Day/Residential Schools by Disability Area



Follow-up Study Questions – Educational Environments (Students 6-21 Years of Age)

Study questions for a multidisciplinary group of OPS staff to consider on the extent to which school-aged students are educated in various educational settings might--

- Does OPS have a process in place for collecting and tracking data on the percentages of students educated inclusively with their nondisabled peers, in separate classes, and in separate schools using various indicators like those shown in exhibits 3c – 3n, and using cross-departmental personnel for review and follow-up?
- What factors might contribute to the following outcomes?
 - ***Inclusive Education (General Education At Least 80 Percent of the Time)***
 - A very high percentage of OPS students were educated inclusively in general education

- classes at least 80 percent of the time from 2013-14 to 2018-19. These figures were above the minimum SPP targets for every school year from 2013-14 through 2018-19. For 2018-19, OPS reported data to the Council team showing that 82 percent of students were educated in this setting, which was higher than the 77 percent figure in the NDE Performance Report. (Exhibit 3c and text following the exhibit)
- A comparison of OPS and national data shows that for students educated inclusively, district percentages were higher than national figures among each of the six most common disability areas. (Exhibit 3d)
 - The percentage of students educated inclusively was lowest for kindergarteners (83 percent). At all other grades, the percentages ranged from 89 percent to 91 percent. (Exhibit 3e)
- ***Special Class (General Education Less than 40 Percent of the Time)***
- Between 2013-14 and 2018-19, OPS rates were higher than state averages for students educated in this setting. In 2018-19, OPS’s rate was 1.2 percentage point above the SPP maximum target. (Exhibit 3g)
 - The percentage of students educated in special classes was highest among kindergarteners (15 percent) and then first grade (11 percent). At all other grades, percentages ranged from 9 percent to 6 percent. (Exhibit 3i)
- ***Special Schools***
- From 2013-14 to 2018-19, OPS’ percentages of students educated in separate schools increased from 3.6 percent (0.8 percentage points below the maximum state target) to 4.2 percent (2.0 percentage points below the target). During the six years of data, state percentages were consistently lower than OPS averages. In 2018-19, OPS’s rate of 4.2 percent was higher than the nation’s 3.0 percent and the state’s 2.2 percent rate for this educational setting. (See exhibit 3k.)
 - OPS figures for each of the six most common disability areas (except for specific learning disabilities and speech/language impairment) were higher than national averages: ED (16 percent to 12 percent), ID (15 percent to 6 percent), autism (8 percent to 7 percent), and OHI (3 percent to 1 percent). (Exhibit 3l)
 - The percentage of students educated in special schools was 2 percent among kindergarteners, but it fell to 0 percent in first grade. Figures ranged between 1 percent and 3 percent for grades two through nine and eleven, and then increased to 5 percent in grade ten. (Exhibit 3m)
 - There was no disproportionality by race/ethnicity among students educated in separate schools. (Exhibit 3n)
 - Some students continue to be enrolled in separate schools even though they attend most of their classes in regular schools.
- What accounts for differences between OPS and NDE Performance Report data on this indicator? It is important for district leaders to have access to reliable data to anticipate SPP

issues and to target improvements for teaching/learning.

- Although OPS's structure for educating school-aged students with disabilities is inclusive in nature, what strategies, training, and human/material resources are needed to improve academic and social/emotional outcomes for students with disabilities? Also, what does OPS need to consider about the educational experience for these students. *See study questions above related to the improvement of student achievement and reduction of out-of-school suspensions.*

AREAS OF STRENGTH

The following are OPS' areas of strength related to the placement of students in inclusive and more-restrictive educational environments.

Children 3 to 5 Years of Age. In 2018-19, both OPS's and the NDE Performance Report percentages of children in separate classes and schools were far below the national average of 22 percent. (Exhibit 3b) [Note that OPS's report shows a much higher 27 percent figure for students educated in this environment, compared to the NDE report of 10.1 percent.]

Students 6 to 21 Years of Age

- ***Inclusive Instruction (General Education At Least 80 Percent of the Time)***
 - A comparison of NDE data for OPS and national data showed that for students educated inclusively, district percentages were higher than national figures (77 percent and 65 percent, respectively). (Exhibit 3c) [Note that OPS reported a higher figure of 82 percent.]
 - For each of the six most common disability areas, OPS figures were higher than national averages, with differences ranging from 25 percentage points (specific learning disability) to 5 percentage points (intellectual disability). (Exhibit 3d)
 - At all grades from first through eleventh, 89 percent or more of OPS students were educated inclusively. (Exhibit 3e)
 - Risk ratios for students educated inclusively were proportionate by race/ethnicity. (Exhibit 3f)
- ***Special Classes (General Education Less than 40 Percent of the Time)***
 - In 2018-19, NDE reported that 7.5 percent of district students were educated in special classes, compared to the nation's 14 percent average. (Exhibit 3g)
 - A comparison of OPS and national data shows that for students educated in separate classes district percentages were lower than national averages in each of the six most common disability areas, with differences ranging from 12 and 11 percentage points (emotional disturbance and autism, respectively) to 5 percentage points (intellectual disability, other health impairment, and speech/language impairment). (Exhibit 3h)
 - Risk ratios for students educated in separate classes were proportionate by race/ethnicity. (Exhibit 3j)
- ***Special Schools***
 - There was no disproportionality by race/ethnicity among students educated in separate

schools. (Exhibit 3n)

OPPORTUNITIES FOR IMPROVEMENT

The following lists areas where OPS could improve the proportion of students educated in inclusive environments.

Children 3 to 5 Years of Age.

- ***Inclusive Instruction (Majority of Special Education in Early Childhood Classes.*** In 2018-19, 73 percent of OPS students were educated inclusively (2 percentage points below the SPP target), compared to the 45 percent national average. (NDE Report, Exhibit 3a) The NDE figure was much higher than the 59 percent figure that OPS reported.
- ***Separate Classes/Schools.*** In 2018-19, 10.1 percent of OPS students were educated most of the time in separate classes or in separate schools. Although 4.6 percentage points higher than the SPP maximum target, the district's rate was smaller than the 22 percent national average. (NDE Performance Report, Exhibit 3b) [Note: NDE's figure of 10.1 percent was much lower than the 27 percent figure that OPS reported.]

Students 6 – 21 Years of Age

- ***Inclusive Instruction (General Education At Least 80 Percent of the Time)***
 - A comparison of 2018-19 NDE data for OPS and national data showed that for students educated inclusively, district percentages were higher than national averages (77 percent and 65 percent, respectively). (Exhibit 3c) [Note that OPS reported a higher figure of 82 percent.]
 - OPS reported a higher 82 percent figure for this educational setting than the NDE report of 77 percent). (Exhibit 3c and text following the exhibit)
 - In kindergarten, 83 percent of OPS kindergarteners were educated inclusively, compared to rates of 89 percent or higher for first through eleventh graders. (Exhibit 3e)

Special Class (General Education Less than 40 Percent of the Time)

- From 2013-14 to 2018-19, OPS figures for students educated in separate classes were higher than state averages. In 2018-19, the district's 7.5 percent of students in this setting was 1.2 percentage point above the SPP maximum target. (Exhibit 3g)
- The percentage of OPS students educated in special classes was highest among kindergarteners (15 percent) and first graders (11 percent). At all other grades, percentages ranged from 6 percent to 9 percent. (Exhibit 3i)

Special Schools

- From 2013-14 to 2018-19, district rates were higher than state averages for students attending special schools. In 2018-19, OPS's rate of 4.2 percent was 2.1 percentage points above the SPP maximum target, and 1.2 percentage points above the national average. (Exhibit 3k)
- OPS figures in each of the six most common disability areas (except for specific learning

disabilities and speech/language impairment) were higher than national averages: ED (16 percent to 12 percent), ID (15 percent to 6 percent), autism (8 percent to 7 percent), and OHI (3 percent to 1 percent). (Exhibit 3l)

- The percentage of students educated in special schools was 2 percent among kindergarteners, but 0 percent in first grade. Figures ranged between 1 percent and 3 percent in grades two through nine and eleven, with a high of 5 percent in grade ten. (Exhibit 3m)
- Some students continue to be enrolled in separate schools even though they may attend most of their classes in regular schools.

IV. STAFFING SUPPORT AND IDEA STATUS

This section summarizes data on various OPS staffing ratios and compares personnel-to-student ratios in OPS with other districts on which the Council team has data. It also includes information on NDE’s determination of the district’s IDEA status, which is based on performance and compliance indicators.

Comparative Personnel-to-Students with IEP Staffing Ratios

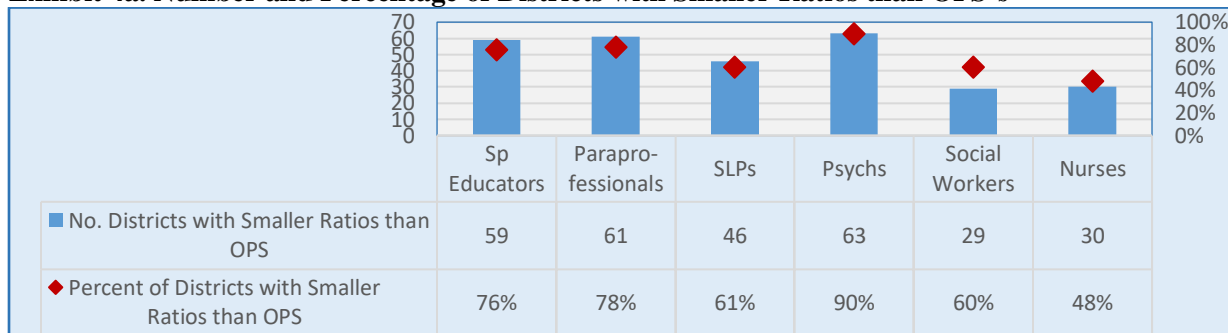
This subsection presents data on staff-to-student ratios for special education personnel, i.e., special educators, paraprofessionals, speech/language pathologists, psychologists, nurses, occupational therapists (OTs), and physical therapists (PTs). OPS ratios are compared to 77 other urban school districts on which we have data.³⁵ (All districts did not report data in each area.) These data are based on full time equivalent (FTE) staff members and not on the number of positions *per se*. Also, the Council team presumes that FTE data included vacant positions.

The data do not give precise comparisons, so results need to be used with caution and should not be relied upon to make personnel decisions. Rather, they should be used to investigate the extent to which personnel in areas outside the norm are being used effectively and how they are meeting the needs of students. In addition, district data are not consistently reported (e.g., some districts include contractual personnel and others exclude them) and data are sometimes affected by varying placement types used by school districts. The data may count all students with IEPs, including those placed in charters, agencies, and nonpublic schools, while other districts do not count these. Still, these data are the best available and are useful as a rough guide to staffing ratios. Appendix B has detailed data on each school district.

Overall School District Ranking

Data in Exhibit 4a show the percentage of districts having students with IEPs-to-staff ratios by personnel area that were smaller than OPS’s, meaning these districts had fewer students to staff in the specified area.

Exhibit 4a. Number and Percentage of Districts with Smaller Ratios than OPS’s



³⁵ Much of the data were provided by the school districts that responded to a survey conducted by the Urban Special Education Leadership Collaborative; the Council team or members of the team collected the remaining data during district reviews.

- **Percentage of Districts with Smaller Ratios.** In three areas, a large proportion of school districts had student-to-personnel ratios that were smaller than OPS ratios: psychologists (90 percent); paraprofessionals (78 percent); and special educators (76 percent).
- **Smaller or Similar Percentage of Districts with Smaller Ratios.** In the remaining three areas, a smaller proportion of districts had similar student-to-personnel ratios to OPS ratios: speech/language pathologists (61 percent), social workers (60 percent), and nurses (48 percent).

Special Educators

Exhibit 4b shows the district’s students-to-special education teacher ratios, compared to 78 other urban school districts. With 485 full-time-equivalent (FTE) special education teaching positions, OPS had an average of 18.9 students with IEPs (including those with speech/language impairments) for every special educator.³⁶ Of the 485 FTE special educators, 14 FTE positions were vacant and 24 FTE special educators were not appropriately endorsed. OPS representatives anticipated that the district will have 52 vacant positions in the 2020-21 school year.

OPS’s ratio of 18.9 students to each special educator was lower than the 14.1 teacher-student average among all districts for which we had data, ranking OPS as 60th among 78 reporting districts. In other words, 76 percent of the districts had a smaller number of special educators for each student with an IEP than OPS.

Exhibit 4b. Average Number Students for Each Special Educator

Number of OPS Staff FTE	485
OPS Students w/IEP-to-Staff Ratios	18.9:1
All District Average Ratios	14.1:1
Range of All District Ratios	7–37:1
OPS Ranking Among Districts ³⁷	60 th of 78 districts

Paraprofessionals

Exhibit 4c shows the district’s students-to-paraprofessional ratios, compared to 78 other urban school districts. With 471 FTE positions, OPS had an average of 19.4 students with IEPs for every paraprofessional. Of the paraprofessional FTE positions, 73 (15.5 percent) were vacant. OPS representatives anticipated that the district will have 44 vacant FTE positions for the 2020-21 school year. These paraprofessionals work from four to 8 hours per day.

³⁶ These and other ratios are based on allocated personnel positions, which include vacancies. Although special educators for the most part do not instruct students with a speech/language impairment only, as speech/language pathologists are the primary providers, these students were included as students with IEPs among all surveyed districts.

³⁷ Ranking begins with districts having a low average number of students to one staff person.

OPS’s ratio of 19.4 students to each paraprofessional was lower than the 14.4 paraprofessional-student average among all districts for which we had data, ranking OPS as 62nd among 78 reporting districts. In other words, 76 percent of the districts had a smaller number of special educators for each student with an IEP than OPS.

This ratio was higher than the 14.4 paraprofessional-student average among all districts for which we had data, ranking OPS as 66th among 78 reporting districts. In other words, 78 percent of the districts had a smaller number of paraeducators for each student with an IEP than OPS.

Exhibit 4c. Average Number Students for Each Paraeducator

Number of Paraprofessional FTE	471
OPS Students with IEPs-to-Staff Ratios	19.4:1
All District Average Ratios	14.4:1
Range of All District Ratios	4.3–56:1
OPS Ranking Among Districts ³⁸	62 nd of 78 districts

Related Services Personnel

Related-services personnel ratios are summarized below and shown in Exhibit 4d.

- **Psychologists.** OPS had 33 FTE psychologist positions. Of the allocated positions, there was one for every 281 students with IEPs, compared with the all-district average of 171 students. The 1.6 FTE vacant positions appear to be filled by contractual personnel, and it was anticipated that two positions will be vacant next school year. OPS ranked 53 of 70 reporting districts in its number of personnel in this area. Some 90 percent of responding districts had a smaller number of psychologists for each student with an IEPs than OPS.
- **Speech/Language Pathologist (SLP).** There were 85 FTE speech/language pathologists (SLPs) allocated positions. OPS indicated that these SLPs were for school-aged children. Of the SLP positions, 3.42 were vacant, and 5 vacancies were anticipated for next school year. Of allocated positions, there was one SLP for every 108 school-aged students with IEPs in OPS. Compared with the all-districts average, OPS ranked 47 of 76 districts reporting SLP data. Some 61 percent of responding districts had a smaller number of SLPs for each student with an IEP than OPS. The student-to-SLP ratio would be smaller and the ranking of the district would be higher with the inclusion of SLPs providing services to early childhood children.
- **SWs.** There were 56 FTE social workers, including 14 vacant positions. Of the allocated positions, 14.6 percent were vacant. There was one social worker for every 389 students with IEPs in OPS, compared with the all-district average of 251 students. OPS ranked 30 of 49 districts reporting social worker data. Some 60 percent of responding districts had a smaller number of social workers for each student with an IEP than OPS.
- **Nurses.** There are 74 FTE nursing positions. Of allocated positions, there was one nurse for

³⁸ Ranking begins with districts having a low average number of students to one staff person.

every 124 students with IEPs in OPS, compared with the all-district average of 165 students for each nurse. OPS ranked 31 of 62 reporting districts. Some 48 percent of these districts had fewer nurses for each student with an IEP than OPS.

Among occupational therapists and physical therapists, OPS staff indicated that data were not available on the number of FTE positions for OTs and PTs hired through contractual services.

Exhibit 4d. Average Number Students for Each Related Service Area

Related-Services Areas	Psychologists	Speech/Lang Pathologists	Social Workers	Nurses
Number of OPS Staff FTE	33	85	56	74
OPS Students w/ IEPs-to-Staff	281:1	108:1	163:1	124:1
All District Average Ratio	171.1:1	119:1	251:1	165:1
Range of All District Ratios	26–1,021:1	31–396:1	26-247:1	58-834
OPS Ranking	64th of 70	47th of 76	30th of 49	31st of 62

Follow-up Study Questions – Staffing Support

Study questions for a multidisciplinary group of OPS staff to consider on OPS staffing support in comparison to 77 school districts might include the following–

- For student-to-special education personnel ratios that were higher than the averages of surveyed districts, to what extent (if any) do OPS’s larger ratios impact teaching and learning? (Exhibit 4a)
 - Psychologists (90 percent of districts had smaller ratios)
 - Paraprofessionals (78 percent of districts had smaller ratios) (Exhibit 4c)
 - Special educators (76 percent of districts had smaller ratios) (Exhibit 4b)
- To what extent will start-of-the-year vacancies impact the provision and/or quality of in-person or distance learning instruction for students with disabilities?
- What is the implication, if any, of OPS not readily having FTE data on the number of contractual occupational and physical therapists? Are district student-to-FTE personnel ratios in these areas sufficient to meet student needs?
- Given the above staffing ratios, are OPS plans and activities sufficiently robust to implement the district’s instructional strategies for students with disabilities in 2020-21?

IDEA Determination Status

As required by the U.S. Department of Education, NDE issues two reports each year: an Annual Performance Report (APR) and a Results-Driven Accountability Matrix (RDA Matrix). Both reports produce overall indicators of district performance and compliance outcomes.

The latest NDE Determinations Summary Worksheet for 2018-19 shows 17 SPP performance and compliance indicators monitored by the state agency. Almost all indicator

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outcomes were reported in prior portions of this report, such as percentages related to various educational settings for early childhood education and school placements.

- **Performance Indicators.** Relates to graduation; dropouts; outcomes for early childhood; reading/math proficiencies; postsecondary education/training/employment; significant discrepancies in suspensions/expulsions, educational settings for early childhood, and for school-aged students; and parent engagement.
- **Compliance Indicators.** Relates to racial/ethnic disproportionalities in suspension/ expulsion over 10 days and disproportionate special education data in six disability areas: timely transition for young children prior to age 3; timely evaluations; and appropriate IEP-transition related content. In addition, there is a component relating to the correction of previously identified noncompliance in transitions for young children, timely evaluations, and IEP-transitions.

Based on the matrix below, OPS earned a “*needs assistance*” IDEA determination. The district’s overall score of 78.74 percent was based on a performance and compliance indicator score of 12.1442, divided by the state target score of 15.4231. OPS indicators, compared to state targets and state performance are provided in Exhibit 4e. Indicators that met/exceeded are in **green**; indicators that almost met are in **yellow**, and indicators far from meeting are in **red**.

Exhibit 4e. Results Driven Accountability Indicators, Performance Rates, and Scores.

	Indicator	OPS %	State Target	State %
PERFORMANCE INDICATORS				
	1. Graduation Rate	80.18	90.00	88.59
	2. Dropout Rate (rate shown in inverse)	96.73	98.11	98.31
3. Reading Math	3. Reading Participation (all levels)	98.75	95.00	98.67
	Elementary Proficiency	13.18	48.32	23.35
	Middle Proficiency	9.25	39.43	15.27
	High Proficiency	8.55	38.95	14.63
Math	Participation (all levels)	98.85	95.00	98.66
	Elementary Proficiency	14.70	47.51	24.57
	Middle Proficiency	7.99	42.94	17.98
	High Proficiency	8.55	39.84	15.804
	4. Suspension/Expulsion Discrepancy	100.00	100.00	100.00
LRE	5A. School Age Regular CR 80%+	77.20	74.60	78.76
LRE	6A. Preschool Regular EC Program	73.12	75.00	81.15
	7. Early Childhood Assessment Average	41.42	73.96	61.25
	8. Parent Involvement	100.00	86.14
	14C. Post-Secondary Outcomes Target C	40.00	83.65	48.78
COMPLIANCE INDICATORS				
	4B. Suspension/Expulsion Discrepancy by Race/Ethnicity	100.00	100.00	100.00

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	Indicator	OPS %	State Target	State %
	9 & 10. Disproportionate Identification, Race/Ethnicity	100.00	100.00	100.00
	11. Timely Evaluation	97.77	100.00	99.89
	13. Secondary Transition Planning	47.62	100.00	95.31
	Timely Reporting/Audit Findings	100.00	100.00	100.00

IDEA Accountability Consequences for “Needs Assistance” Determination

For districts with two consecutive years of a ‘needs assistance’ determination, the IDEA calls for one or more of the following actions:

- **Technical Assistance**, which may include--
 - Advice by experts to address areas of assistance needed, including explicit plans for addressing areas of concern within a specified period;
 - Assistance in identifying and implementing professional development, instructional strategies, and methods of instruction that are based on scientifically based research;
 - Designating and using distinguished superintendents, principals, special education administrators, special education teachers, and other teachers to provide advice, technical assistance, and support; and
 - Devising additional approaches to providing technical assistance, such as collaborating with institutions of higher education, educational service agencies, national centers of technical assistance, and private providers of scientifically based technical assistance.
- Directs the use of district funds on the area(s) of need.
- Identifies the district as a high-risk grantee and imposes special conditions on the IDEA grant.

Follow-up Study Questions – Compliance

Study questions for a multidisciplinary group of OPS staff to consider related to OPS special education compliance issues might include the following –

- Does OPS have a process in place for collecting and tracking data on OPS’s IDEA determination status and indicator outcomes on performance/compliance factors needing improvement shown in exhibit 4e, and using cross-departmental personnel for review and follow-up?
 - **Areas Far from SPP Targets**
 - Reading and math proficiency rates (elementary, middle, and high school levels) (# 3)
 - Early childhood assessment average (# 7)
 - Post-secondary outcomes (target C) (# 14C)
 - Secondary IEP transition planning (# 13)
 - **Areas Close to SPP Targets**
 - Graduation rate (# 1)

- Dropout rate (# 2)
- Preschool regular early childhood (# 6A)
- Timely evaluation (# 11)
- For how many years has NDE found OPS “needing assistance?” What actions, if any, has NDE required OPS to take? What has NDE itself provided?
- Has there been a collaborative effort between general, special education, and English learner support personnel to develop a strategic plan with training, human/material resources, and implementation efforts to improve teaching/learning? (See associated study questions above for more detailed guidance.)

AREAS OF STRENGTH

The following are OPS areas of strength related to staffing support and IDEA compliance.

- **Staffing Support.** In three areas, a smaller proportion of surveyed districts had similar student-to-personnel ratios than OPS ratios: speech/language pathologists (61 percent), social workers (60 percent), and nurses (48 percent).
- **Compliance Support.** NDE’s IDEA determination of “needs assistance” highlights the following areas in which OPS met state targets:
 - Participation rates for statewide assessments in reading and math (# 3)
 - Suspension/expulsion discrepancy rates (# 4)
 - Education of school-aged students in general education classes at least 80 percent of the time (# 5A)
 - Suspension/expulsion discrepancy by race/ethnicity (# 4B)
 - Disproportionate identification by race/ethnicity (## 9 and 10)
 - Timely reporting and audit findings

OPPORTUNITIES FOR IMPROVEMENT

The following are OPS opportunities for staffing support in special education and for improving IDEA performance and compliance.

- **Staffing Support.** OPS had much larger ratios than surveyed school districts in the areas below: (Exhibit 4a)
 - Psychologists (90 percent of districts had smaller ratios)
 - Paraprofessionals (78 percent of districts had smaller ratios) (Exhibit 4c)
 - Special educators (76 percent of districts had smaller ratios) (Exhibit 4b)
 - No data were available on the number of FTE contractual personnel in the areas of occupational therapy or physical therapy.
- **Compliance Support.** NDE’s IDEA determination of “needs assistance” is based on the following OPS performance/compliance areas that do not meet state targets –
 - **Areas Far from SPP Targets**

- Reading and math proficiency rates (elementary, middle, and high school levels) (#3)
- Early childhood assessment average (# 7)
- Post-secondary outcomes (target C) (# 14C)
- Secondary IEP transition planning (# 13)
- ***Areas Close to SPP Targets***
 - Graduation rate (# 1)
 - Dropout rate (# 2)
 - Preschool regular early childhood (# 6A)
 - Timely evaluation (# 11)

RECOMMENDATIONS

Based on our review of OPS and NDE Performance Report data and other information provided by OPS staff, the Council team has several recommendations for the district to consider. Our proposals are followed by a matrix showing interrelationships between various sections.

We recognize that during the COVID-19 pandemic there are many conflicting priorities to consider. These include managing the many complexities involved in providing safe environments for students and staff and ensuring quality instruction. This is a feat that all Council members are struggling to achieve. To support these efforts, the Council of the Great City Schools has developed an extensive array of web-based resources and conduct weekly and bi-weekly ZOOM meetings to share information and support inter-district collaboration. One will find many of these resources at <https://www.cgcs.org/corona>.

At the center of this report are a series of study questions that were devised around data provided by OPS and the NDE Performance Report on the district. The study questions were intended to guide district personnel in understanding the data and promoting thoughtful consideration of ways in which OPS can address the needs that the data identify. We urge the district to assemble students, faculty, and families to discuss them.

A common theme throughout the Council's study questions is the use of an interdisciplinary approach to problem-solving, strategic planning, and implementation support. When efforts are not interdisciplinary or collaborative, it will be harder to identify and address unanticipated consequences and it will be more difficult to build ownership in solutions.

Furthermore, when a district undertakes activities to improve teaching and learning for students with disabilities, we discourage the all-too-frequent assumption that efforts should be undertaken through the lens of special education and special education staff alone. It is not possible for special education personnel to unilaterally improve achievement and social/emotional outcomes without a coordinated and comprehensive effort involving the collective and intentional work of all educators at district and school levels.

OPS is to be congratulated for the extent to which its students are educated in general education classes. The district is far ahead of many big city school districts on this front. Still, it is a challenge everywhere. This asset on OPS' part allows it to focus on providing instructional and social/emotional supports that enable students with disabilities in general education classes to learn and achieve at levels attained by their peers. This typically requires core and other curricular material to reach every student, and it allows for targeted and supplemental student interventions in areas of need. In addition, the district is encouraged to pursue a strong focus on social/emotional supports and consequences for poor behavior that do not rely primarily on suspensions (particularly for Black students).

This report and the recommendations below are heavily grounded in the data. Typically, Council teams convene two days of focus groups with scores of participants. The restrictions of the COVID-19 virus caused the district and the Council team to eliminate this activity.

Nevertheless, as information in this report shows, the continuous review of data provides valuable insight into a district's issues that can help chart improvement. By collecting, tracking, and reviewing data on multiple indicators, such as achievement by disability category, grade, race/ethnicity, gender, and English learners, the district can tailor efforts to meet the needs of specific students and avoid masking underlying patterns. In this way, OPS can be ahead of NDE and proactively address issues of concern. The recommendations below are designed to assist OPS in this effort.

1. *Establish multi-disciplinary teams to review data exhibits/other available information and the Council team's associated study questions to guide discussion about program implications and factors that may contribute to disparities that need to be addressed.*

- ***Oversight.*** Identify a high-level administrator having broad oversight over all inter-departmental team members to establish teams and expectations for work; support the work of team members by, for example, problem-solving issues beyond their control and establishing relatively short but realistic time frames for various review and planning activities. These time frames need to take into consideration competing priorities to protect the health and safety of personnel and students during the COVID pandemic.
- ***Inclusive Teams.*** Teams should be inclusive, and they should include administrators and experts from general and special education, English learner support, gifted education, education to career personnel, data technicians, and others as needed.
- ***Multiple Teams.*** Various teams should be employed, and one team may address several areas, e.g., disability prevalence, disability by race/ethnicity, and disability and English learners.
- ***Coordination of Teams.*** Have a process for teams to continuously review each other's work to avoid redundancy and inconsistencies, and to leverage resources by combining efforts whenever possible.
- ***Data.*** Enable each team to identify additional data they need to address the study questions under review, including more current data as appropriate. Establish a mechanism to provide information in user-friendly formats. Have team members consider whether the data they are reviewing is typically available.
- ***COVID-19 Implications.*** Have each team consider the multiple effects of COVID-19 on student learning and social/emotional well-being in 2019-20 as well as expectations for 2020-21. Also, teams should consider the impact on school personnel and families.
- ***Planning.*** Have each team design a plan for improving outcomes related to their area of work.

(See Appendix A for a compilation of all study questions.)

2. *Template for Work.* Establish a template for each team to document the results of their study and strategic designs. For example, the template might include the following sections for each area of work, e.g., disability prevalence, with a description of each section.

- ***Area of work.*** Describes the team's area of work and why is important to address.

- **Current performance and targeted goals.** For each area of work, summarize current data and targeted goals. Suggest a process for collecting, tracking, and reviewing data on a regular basis.
 - **Inconsistent OPS and NDE Performance Report data.** Based on a review of OPS and NDE data sources, determine if there is a basis for the differences and any actions that need to be taken to reconcile data.
- **Strategies.** Describe strategies for meeting targeted goals.
- **Instructional Materials.** List and describe any instructional materials recommended, and reasons (evidence-base if available) for their selection. Also, list any current materials that are not considered to be evidence-base and/or successful and why. The team might also recommend that OPS initiate a Request for Information or Request for Proposals to help identify best products/services in the marketplace.
- **Training.** Identify training needed to achieve improvements, and how that training will be differentiated for various stakeholder groups, such as general/special education and English learner teachers, paraprofessionals, related services providers, and parents. Consider and identify professional development that could be provided on-line through webinars and other platforms, as well as other training that would be given in-person when safe to do so. Include training for new and current individuals and determine when training might be periodically repeated for new information or to refresh/improve understanding. Also, consider the following –
 - **Interdepartmental Learning.** How core level knowledge relevant to each department will be shared to increase support for schools. For example, expand basic understandings of special education and support for English learners across department personnel.
 - **Cross-Functional Approach.** How training will be provided using a cross-functional approach with individuals from different departments learning together;
 - **Resources.** Written materials needed to support training and web-based postings;
 - **Follow-Up.** What additional modeling, coaching, and supports might be needed for information from the professional development to be acted upon in classrooms; and
 - **Cross-School.** Opportunities for cross-school communications and collaboration.
- **Written guidance.** For each strategic improvement area, identify the written guidance that is needed, which would be posted electronically, to outline expectations, parameters of work.
- **Personnel.** For each strategic improvement area, identify personnel responsible for implementation, and personnel who will support the effort.
- **Time frames.** Establish reasonable time frames for achieving each initiative, with interim dates for updating progress.
- **Monitoring.** Describe the quantitative and qualitative information needed to assess the effectiveness of designed strategies.

3. **Comprehensive Implementation Plan.** Draft an overall implementation plan that includes the above information. If appropriate, authorize work on individual activities prior to the finalization of an overall comprehensive plan to expedite implementation, ensuring that this work is consistent with other activities being considered. As part of this process, consider the following based on collective team recommendations –

- **Current performance and targeted goals.** For each area of work, summarize current data and targeted goals.
- **Data.** Establish a process for collecting, presenting, and reviewing data that is inclusive of all data needed for review and progress monitoring.
- **Instruction and social/emotional supports.** Consider how various activities relevant to teaching and learning are associated and how they could be addressed in a coordinated and collaborative manner through a MTSS. Consider both in-school and distance learning instruction.
- **Training.** Consider the extent to which various aspects of needed professional development can be combined and reinforced.
- **Written Guidance.** Identify areas in which a need for written guidance overlaps with other areas and identify areas of need that are missing. Consider the best way to present information on-line along with associated training needs.
- **Personnel.** For each strategic improvement area, identify personnel responsible for implementation, and the type of personnel necessary to support the effort.
- **Time frames.** Establish reasonable time frames for achieving each initiative, with interim dates for updating progress.
- **Monitoring.** Describe the quantitative and qualitative information needed to assess the effectiveness of designed strategies. Combine similar activities to streamline the process. Describe feedback loops that will be used across departments and with schools to identify trends, address problems, and celebrate successes.
- **Communication.** Describe how the comprehensive plan will be communicated to all stakeholders, and how feedback will be provided.

4. **School-based plans.** Establish a process for each school to develop a plan based on the district's comprehensive plan, using a template and school-based data. To the extent feasible, embed various components in current school-based planning documents.

5. **Describe additional actions OPS can take to address the following areas for improvement.**

- **NDE diploma for students taking an alternate assessment.** If the state adoption of ESSA allows for an alternate diploma for students with the most significant cognitive disabilities, describe how OPS could work with NDE and with other school districts in the future to lobby NDE for this adoption.
- **Inconsistent OPS and NDE Performance Report data.** Based on the team's review of achievement, graduation/dropout, and educational setting data sources from OPS and the NDE Performance Report, determine what action should be taken to understand the

differences and reconcile the data.

- ***Student-teacher ratios.*** Based on the team’s review of student-to-special education personnel ratios that are far larger than the averages, describe any changes to current ratios that would be needed to better support teaching and learning.
- ***COVID-19 impact on personnel availability.*** Given the team’s understanding of how COVID-19 affects special education personnel availability and vacancies in 2020-21 school year—
 - Identify areas of need for FTE positions authorized and not filled, including those expected to be vacant;
 - Describe recruitment and other strategies OPS will use to meet staffing needs; and
 - Describe the professional development that will be provided to new staff persons as they are hired throughout the year.
- ***Leadership and collaboration.*** Describe steps OPS will take to maximize interdepartmental collaboration, principal oversight of special education, and accountability for expected practices when schools are provided with adequate training, written guidance, and human/material resources.

Recommendation Matrix

The matrix below shows for each area of review the associated strategy for improvement. This arrangement provides a visual framework for understanding linkages between the strategies.

	1. Disability Prevalence	2. Disability by Race/Ethnicity & Gender	3. Disability & ELs	4. Section 504	5. 3-5 YO Achievement	6. NAEP	7. State Assessment	8. Graduation/Dropout	9. Secondary Transition	10. Out-of-School Suspensions	11. Ed Setting (3-5 Year Olds)	12. Ed Settings (6-21 year Olds)	13. Staffing Support	14. DEA Determination
Multidisciplinary review of data/study questions	x	x	x	x	x	x	x	x	x	x	x	x		x
Process in place for collecting, presenting & reviewing data	x	x	x	x	x		x	x	x	x	x	x		x
Factors that may contribute to data disparities/concerns	x	x	x		x		x	x	x	x	x	x		x
Impact of instruction & social/emotional well-being due to COVID-19	x	x	x	x	x		x	x	x	x		x		
MTSS in place & effective	x	x	x		x			x		x		x		
Plan for training & material/human resources for improvement		x	x	x	x		x	x	x	x		x		
Written on-line guidance & related training	x		x	x										
Monitoring		x	x	x	x		x	x	x	x		x		x
Contact CGCS districts with relatively strong achievement/growth						x								
Policy		*				**		***						
NDE & OPS data differences											x	x		
COVID-19 staffing Impact and staffing ratios													x	
Maximize collaboration, principal oversight & accountability														x

* Pertains to obtaining guidance from NDE regarding the state definition for significant disproportionality and related requirements.

** Pertains to consideration of posting OPS NAEP scores through the TUDA initiative.

***Pertains to benefit analysis for NDE to establish a graduation diploma with standards for students taking an alternate assessment.

APPENDICES

Appendix A. Follow-up Data Study Questions

Disability Prevalence

Reviewing the composition of students by primary disabilities and grades helps to understand eligibility trends, plan follow-up activities, and intervene where appropriate, e.g., growth of students with ED. Study questions for a multidisciplinary group of OPS staff,³⁹ which include those overseeing general education, special education, and instruction for English learners, gifted learners, might include the following –

- Does OPS have a process in place for collecting and tracking data like that shown in exhibits 1a – 1g, and using cross-departmental personnel for review and follow-up?
- What factors might contribute to disparities, such as the following:
 - Disability prevalence data on young children in OPS that are larger/smaller than state/national rates, e.g., speech/language impairment, autism, hearing impairment. (Exhibit 1a)
 - Variance in numbers of students with disabilities by grade (Exhibit 1d), and trends in the following:
 - Growth of specific learning disability categories, which peaked at sixth grade. (Exhibit 1f)
 - Implications of high numbers of students with autism at the prekindergarten level and as they continue in school. (Exhibit 1g)
 - Growth of students with emotional disturbance, its peak at ninth grade, and sudden decrease in eleventh grade. (Exhibit 1g)
 - Growth in the intellectual disability category, especially at fourth, eighth, and tenth grades. (Exhibit 1g)
- Are there concerns that in-home learning due to COVID-19 and decreased levels of performance/social emotional behavior might increase referrals for special education evaluations?
- Based on these and other analyses, are there educational and social/emotional strategies that OPS can employ/improve using a multi-tiered system of supports (MTSS) to help improve students' achievement/well-being and general education supports and reduce special education reliance?
- Does MTSS currently include measures to screen and identify students needing additional supports?
- Has OPS provided stakeholders sufficient and continued MTSS training, and identified high

³⁹ The term “multidisciplinary group of persons” as used throughout this report is intended to involve a diverse group of administrators and others, including those identified above.

quality material/human resources at every school that would support student improvement?

- Does OPS have a comprehensive and user-friendly special education operations manual that is available on-line for all stakeholders that is updated regularly? Is training provided to all stakeholders, including new personnel with periodic updated sessions that are targeted to meet participant needs?

Disability Incidence by Race/Ethnicity and Gender

Data concerning students with disabilities by race/ethnicity and gender raises various issues for further study by a multidisciplinary group of persons. Questions might include the following –

- Does OPS have a process in place for collecting and tracking data like that shown in exhibits 1h-1m, and using cross-departmental personnel for review and follow-up?
- What factors might contribute to the high disproportion of:
 - Black and Multiracial students with ED, and White students with SLI or OHI. (Exhibit 1j)
 - Black, Hispanic, White, and multiracial males diagnosed with ED. (Exhibit 1l)
 - Black and Hispanic males diagnosed with OHI. (Exhibit 1l)
 - Black and Multiracial males diagnosed with DD. (Exhibit 1l)
 - Black males diagnosed with DD, OHI, autism, or ED. (Exhibit 1l)
- Are there educational and social/emotional strategies that OPS can employ/improve using MTSS to improve students' achievement and well-being that can improve general education supports and reduce special education reliance?
- Are there any concerns that in-home learning due to COVID-19 and decreased levels of performance/social emotional behavior might increase male referrals for the disability areas referenced above?
- Does the OPS special education operational manual contain information relevant to race/ethnicity and English language acquisition, and is it included in training?

Disability and English Learners

The data concerning English learners with disabilities raises several follow-up issues. Study questions for a multidisciplinary group of persons might include the following –

- Although SPP does not require the collection of data to assess disproportionality issues on ELs and disability, does OPS have a process in place for collecting and tracking data like that shown in exhibits 1n-1s, using cross-departmental personnel for review and follow-up?
- What factors might contribute to disparities, such as the following:
 - Larger percentage of ELs compared to non-ELs with a speech/language impairment or developmental disability. (Exhibit 1o)
 - Lower percentages of ELs compared to non-ELs with an other health impairment, autism, emotional disturbance, or intellectual disability. (Exhibit 1o)

- Sudden decrease of ELs from sixth to seventh grade. (Exhibit 1q)
- Larger proportions of long-term ELs identified as having a specific learning disability compared to all other disability areas. (Exhibit 1r)
- Large decreases of long-term ELs with a specific learning disability from sixth to seventh grade. (Exhibit 1s)
- Based on these and other analyses, does OPS's MTSS model and its school implementation practices address the diagnostic and instructional needs of ELs to improve general education supports, improve English language acquisition, and reduce special education reliance?
- Do OPS screening, evaluation, and/or eligibility-determination practices need improvement to address disability needs of English learners?

Section 504

With a low number/percentage of students with Section 504 services and no data for tracking students with health plans, follow-up study questions might include the following –

- Does the district have written procedures and practices for Section 504 evaluation and eligibility processes? Is this information written in a user-friendly manner and available online?
- Have school-based personnel received ongoing training on these processes?
- Does the district have an electronic process for developing/monitoring Section 504 evaluations, eligibility determinations, and planning?
- Does the district have a process for considering whether a student with a physical/mental health impairment that justifies a written health plan may meet Section 504 eligibility criteria, i.e., the student's physical/mental impairment substantially limits a major life activity?

Young Children Achievement Outcomes

Study questions for a multidisciplinary group of OPS staff to consider when looking at achievement outcomes for children with disabilities who are three to five years of age might include the following –

- Does OPS have a process in place for collecting and tracking SPP achievement outcome data like that shown in exhibits 2a and 2b, and using cross-departmental personnel for review and follow-up?
- What factors might contribute to the following outcomes?
 - Low achievement compared to state and state targets for children who entered an early-childhood program below developmental expectations for their age, but who substantially increased developmentally by age six when they exited the program. (Exhibit 2a)
 - Low achievement compared to state and state targets for children who functioned within expectations by age six or who attained those expectations by the time they exited the program. (Exhibit 2b)

- Are there educational and social/emotional strategies that OPS can employ/improve to expedite student growth?
- Considering the above as well as COVID-19 restrictions on in-school education are there additional concerns about the achievement and social/emotional well-being of these outcomes that require additional strategies, training, and implementation practices?

Achievement on the NAEP

Study questions for a multidisciplinary group of OPS staff to consider regarding NAEP outcomes might include the following –

- To what extent does OPS collect and review NAEP outcomes for children with disabilities, including comparison with state and national results?
- Would it be useful for OPS to contact Council districts showing relatively high results and/or improvement to consider strategies they used to support student growth and well-being? (Exhibits 2c – 2f)

Statewide Assessments

Study questions for a multidisciplinary group of OPS staff to consider around achievement outcomes for students with disabilities taking statewide assessments might include the following –

- Does OPS have a process in place for collecting and tracking statewide achievement outcomes like those shown in exhibits 2g – 2j, and using cross-departmental personnel for review and follow-up?
- What factors might contribute to the following outcomes?
 - Percent of students with disabilities at/above proficiency for reading/ELA increasing in 2017-18 and decreasing in 2018-19, and flat in math from 2016-17 to 2018-19. (Exhibit 2g)
 - OPS proficient reading and math scores below state and SPP targets at the elementary, middle, and high school levels. (Exhibit 2h – 2i)
 - Some 1.5 percent of students taking an alternate assessment, which is above the federal one percent standard, which requires OPS to submit a waiver request to NDE to justify the difference.
 - Mid-level proficiency rates for OPS students taking an alternate assessment. (Exhibit 2j)
- Are there educational and social/emotional strategies that OPS can employ/improve to expedite student growth? For example:
 - Is multi-sensory instruction used for students with low reading and math achievement, and

- if so, are these implemented with fidelity?⁴⁰ Are off-the-shelf programs needed to immediately expand usage of this instructional model?
- Are other evidence-based instructional practices in place for students who are far below grade-level achievement standards in one or more area?
 - Do teachers need additional professional development to implement the above and other instructional strategies?
 - Considering COVID-19 restrictions on in-school education and challenges to distance learning, what plans, training, and human/material resources are needed to support teaching and learning?

Graduation and Dropout Rates

Study questions for a multidisciplinary group of OPS staff to consider regarding improving graduation and dropout rates for students with disabilities might include the following –

- Does OPS have a process in place for collecting and tracking SPP achievement outcomes like those shown in exhibits 2k – 2n, and using cross-departmental personnel for review and follow-up?
- What factors might contribute to the following outcomes?
 - Slow increase between 2014-15 and 2018-19 in the percentage of students with disabilities who graduate with a regular diploma (56 percent to 60 percent) and slow decrease in the OPS graduation gap for students with disabilities and all students. (Exhibit 2k)
 - Significantly higher NDE Performance Report percentages compared to OPS data for students with disabilities who graduated with a regular diploma. (Exhibit 2l)
 - Flattening of percentage points between OPS disability graduation rates and SPP targets from 2016-17 to 2018-19. (Exhibit 2l)
 - Higher OPS disability dropout rates on the NDE Performance Report compared to OPS data from 2014-15 and 2018-19. (Exhibit 2n)
 - Continuous OPS disability dropout rate above SPP targets and state rates. (Exhibit 2n)
- Would Nebraska’s adoption of the ESSA allowance for an alternate diploma for students with the most significant cognitive disabilities benefit OPS students? If so, how could OPS work with NDE and other school districts to lobby for this adoption?
- Considering COVID-19 restrictions on in-school education and challenges to distance learning, are there concerns that these circumstances could negatively impact disability graduation and drop out outcomes for 2020-21 and beyond?
- What strategies, activities, training, and material/human resources are necessary to improve outcomes for students who are/could be in danger of not graduating or of dropping out of

⁴⁰ Retrieved from <https://www.understood.org/en/school-learning/partnering-with-childs-school/instructional-strategies/multisensory-instruction-what-you-need-to-know>

school?

Secondary Transition

Study questions for a multidisciplinary group of OPS staff when considering improvements to IEP transition compliance and work/education after leaving high school might include the following –

- Does OPS have a process in place for collecting and tracking SPP transition compliance rates and SPP outcomes one year after students with disabilities leave high school with data like those shown in exhibits 2k – 2n, and using cross-departmental personnel for review and follow-up?
- What factors might contribute to the following outcomes?
 - Decreased IEP transition compliance rates from 2013-14 (100 percent) to 2018-19 (48 percent), compared to increased state compliance (77 percent to 95 percent). (Exhibit 2o)
 - Decrease from 2013-14 to 2018-19 in percentages of students with disabilities enrolled in higher education, competitively employed, or in another postsecondary education or training program, and increases in percentage points below SPP targets. (Exhibit 2p)
- Considering access to community-based training programs and post-secondary educational options, what strategies could OPS employ in 2020-21 to address potential negative consequences for students who would graduate at the end of the school year and beyond? What internal and external resources can OPS use to support implementation of these strategies?
- What strategies could OPS employ to improve IEP transition compliance, such as improved training, edits to the IEP system that would guide data entry, etc.?

Out-of-School Suspensions

Study questions for a multidisciplinary group of OPS staff to consider in reducing the need for out-of-school suspensions (OSS) among students with disabilities include the following –

- Does OPS have a process in place for collecting and tracking data on OSS by various indicators among students with and without disabilities and English learners like those shown in exhibits 2q – 2w, and using cross-departmental personnel for review and follow-up?
- What factors might contribute to the following outcomes?
 - A 2.31 greater likelihood that students with IEPs would receive an OSS compared to students without IEPs. (Exhibit 2q)
 - Very high OSS risk ratios for students with IEPs compared to those without IEPs at almost every grade, with the highest risk ratio for kindergarteners. (Exhibit 2r)
 - Highest risk ratios for students with IEPs in receiving an OSS for more than 30 days compared to 30 days or less. (Exhibit 2s)
 - Highest percentages of students with IEPs to receive an OSS of more than 30 days at kindergarten through third grades, and fourth through sixth grades. Highest percentage of

- students to receive an OSS of 11 to 30 days at kindergarten through third grades. (Exhibit 2t)
- Black students were 2.6 times more likely and Black students with IEPs were 2.99 times more likely to receive an OSS compared to students from other races/ethnicities. (Exhibit 2u)
 - Black students with IEPs were much more likely than students from other races/ethnicities to receive an OSS for 11 to 30 days (4.09 risk ratio), 31 to 74 days (3.9 risk ratio), and 1 to 10 days (2.33 risk ratio). (Exhibit 2v)
 - English learners with IEPs were much less likely than ELs without IEPs to be suspended. (Exhibit 2w)
- In addition to the data referenced above, consider computing risk ratios for Black males and Black females (with and without IEPs) to address any additional significant disparities. Consider reviewing OPS data that could reveal other Black student/student with IEP disparities, such as in-school suspensions for 10 days or less and over 10 days, unexcused absences (by various number of days), graduation/ dropout, and achievement data.
 - Given the above OSS disparities among Black students, consider the affect of the Black Lives Matter movement on any disproportionate impact of COVID-19 related experiences.
 - Based on these analyses, what are the educational and social/emotional strategies that OPS could use/improve through an MTSS model that would markedly advance social/emotional outcomes for all students, including those with IEPs, and particularly Black students with/without IEPs. What are the training and human/material resources needed to carry out these strategies?

Educational Environments for Young Children

Study questions for a multidisciplinary group of OPS staff to consider around the extent to which children three to five years of age receive special education/related services in early childhood classrooms for most of the time might include the following –

- Does OPS have a process in place for collecting and tracking data on young children educated inclusively with their nondisabled peers or in separate classes/schools (such as shown in exhibits 3a-3b, along with associated text) and using cross-departmental personnel for review and follow-up?
- What factors might contribute to the following outcomes?
 - A trend toward smaller percentages of children educated inclusively from 2013-14 to 2018-19 (81 percent to 73 percent), which never met minimum SPP targets. (Exhibit 3a)
 - NDE Performance Report for 2018-19 showing 73 percent of OPS children receiving most of their special education in early childhood classes compared to 59 percent reported by OPS. (Exhibit 3a and OPS data text.)
 - Trend toward larger percentages of young children educated in separate classes/schools from 2013-14 to 2017-18, (8.3 percent to 10.1 percent, after a high of 12.7 percent in 2014-

- 15). OPS figures were consistently higher than state percentages, and they were above SPP targets.
- In 2017-18, OPS reported a much higher 27 percent of students in this educational environment than did NDE (10.1 percent report). (Exhibit 3b) The national average is 22 percent for this educational setting.
 - Even though young children in OPS are educated with their nondisabled peers at a far greater rate than their peers nationally, the achievement outcomes for OPS children are far below state averages and SPP targets. (Exhibits 2a and 2b)
- What accounts for differences between OPS and NDE Performance Report data on this indicator?
 - What strategies, training, and human/material resources are needed to improve achievement outcomes for young children with disabilities in OPS and meet SPP targets? What does OPS need to consider regarding the learning and social/emotional experiences of young children who received varying instruction during the 2019-20 school year and the experiences of newly enrolled children whose lives were changed because of COVID-19?

Educational Environments for Students 6-21 Years of Age

Study questions for a multidisciplinary group of OPS staff to consider on the extent to which school-aged students are educated in various educational settings might include—

- Does OPS have a process in place for collecting and tracking data on the percentages of students who are educated inclusively with their nondisabled peers, in separate classes, or in separate schools using various indicators like those shown in exhibits 3c – 3n, and using cross-departmental personnel for review and follow-up?
- What factors might contribute to the following outcomes?
 - ***Inclusive Education (General Education At Least 80 Percent of the Time)***
 - A very high percentage of OPS students were educated inclusively in general education classes at least 80 percent of the time from 2013-14 to 2018-19. These figures were above the minimum SPP targets for every school year from 2013-14 through 2018-19. For 2018-19, OPS reported data to the Council team showing that 82 percent of students were educated in this setting, which was higher than the 77 percent figure in the NDE Performance Report. (Exhibit 3c and text following the exhibit)
 - A comparison of OPS and national data shows that for students educated inclusively, district percentages were higher than national figures in each of the six most common disability areas. (Exhibit 3d)
 - The percentage of students educated inclusively was lowest for kindergarteners (83 percent). At all other grades, the percentages ranged from 89 percent to 91 percent. (Exhibit 3e)
 - ***Special Class (General Education Less than 40 Percent of the Time)***
 - Between 2013-14 and 2018-19, OPS figures were higher than state averages for

students educated in this setting. In 2018-19, the OPS rate was 1.2 percentage point above the SPP maximum target. (Exhibit 3g)

- The percentage of students educated in special classes was highest among kindergarteners (15 percent) and then first grade (11 percent). At all other grades, percentages ranged from 9 percent to 6 percent. (Exhibit 3i)

– *Special Schools*

- From 2013-14 to 2018-19, OPS percentages of students educated in separate schools increased from 3.6 percent (0.8 percentage points below the maximum state target) to 4.2 percent (2.0 percentage points below the target). During these six years of data, state percentages were consistently lower than OPS averages. In 2018-19, the OPS rate of 4.2 percent was higher than the nation’s 3.0 percent and the state’s 2.2 percent rate for this educational setting. (See exhibit 3k.)
 - OPS rates in each of the six most common disability areas (except for specific learning disabilities and speech/language impairment) were higher than national averages: ED (16 percent to 12 percent), ID (15 percent to 6 percent), autism (8 percent to 7 percent), and OHI (3 percent to 1 percent). (Exhibit 3l)
 - The percentage of students educated in special schools was 2 percent among kindergarteners and 0 percent in first grade. Figures ranged between 1 percent and 3 percent in grades two through nine and eleven, and then increased to 5 percent in grade ten. (Exhibit 3m)
 - There was no disproportionality by race/ethnicity among students educated in separate schools. (Exhibit 3n)
 - Some students continue to be enrolled in separate schools even though they attend most of their classes in regular schools.
- What accounts for differences between OPS and NDE Performance Report data for this indicator? It is important to know data to anticipate SPP issues and to target improvements for teaching/learning.
 - Although OPS’s structure for educating school-aged students with disabilities is inclusive in nature, what strategies, training, and human/material resources are needed to improve academic and social/emotional outcomes for students with disabilities? Also, what does OPS need to consider about the experience. *See study questions above related to the improvement of student achievement and reduction of out-of-school suspensions.*

Staffing Support

Study questions for a multidisciplinary group of OPS staff to consider when looking at OPS staffing support in comparison to 77 school districts might include the following –

- For student-to-special education personnel ratios that were far larger than the averages of surveyed districts, to what extent (if any) do OPS’s ratios impact teaching and learning? (Exhibit 4a)
 - Psychologists (90 percent of districts had smaller ratios)

- Paraprofessionals (78 percent of districts had smaller ratios) (Exhibit 4c)
- Special educators (76 percent of districts had smaller ratios) (Exhibit 4b)
- To what extent will start-of-the-year vacancies among special educators, paraprofessionals, and other areas impact the provision and/or quality of in-person or distance learning instruction?
- What is the implication, if any, of OPS not readily having FTE data on numbers of contractual occupational and physical therapists? Are student-to-FTE personnel ratios in these areas sufficient to meet student needs?
- Given the above considerations, as well as staffing needs (including for substitutes), are OPS plans and activities sufficiently robust to implement the district’s instructional strategies for students with disabilities in 2020-21?

Compliance

Study questions for a multidisciplinary group of OPS staff to consider when looking at OPS special education compliance issues might include the following –

- Does OPS have a process in place for collecting and tracking data on OPS’s IDEA determination status and indicator outcomes to determine factors needing improvement like that shown in exhibit 4e, and using cross-departmental personnel for review and follow-up?
 - ***Areas Far from SPP Targets***
 - Reading and math proficiency rates (elementary, middle, and high school levels) (# 3)
 - Early childhood assessment average (# 7)
 - Post-secondary outcomes (target C) (# 14C)
 - Secondary IEP transition planning (# 13)
 - ***Areas Close to SPP Targets***
 - Graduation rate (# 1)
 - Dropout rate (# 2)
 - Preschool regular early childhood (# 6A)
 - Timely evaluation (# 11)
- For how many years has NDE found OPS in “needs assistance” status? What actions, if any, has NDE required OPS to take? What has NDE done?
- Has there been a collaborative effort between general, special education, and English learner support personnel to develop a strategic plan with training, human/material resources, and implementation efforts to improve teaching/learning? (See associated study questions above for more detailed guidance.)

Appendix B. Incidence Rate and Staffing Ratios

The Urban Special Education Leadership Collaborative and the Council of the Great City Schools, including its team members who have conducted special education reviews, collected the data reported in these tables. *The data do not give precise comparisons, so the results need to be used with caution.* District data are not consistently reported (e.g., some districts include contractual personnel and others may exclude them) and the numbers are sometimes affected by varying placement types used by a school district. The data may count all students with IEPs, including those placed in charters, agencies, and nonpublic schools. Still, these data are the best available and are useful as a rough guide to staffing ratios.

Improving Special Education Services in the Omaha Public Schools

Incidence of Students with IEPs and Personnel Staffing Ratios*

	% IEPs of All Students		Sp Ed Teachers		Paraeducators		Speech/Lang Pathologists		Psychologist	
	# IEPs	% IEPs	FTE	Ratio	Number	Ratio	FTE	Ratio	FTE	Ratio
Agawam Public Schools	656	15%	39	17	100	7	15	44	3	219
Atlanta Public Schools	4,950	11%	431	11	224	22	65	76	22	225
Albuquerque Public Schl	16,738	20.4%	1217	13.8	1290	12.98	161.5	103.6	97.6**	171.5
Anchorage School Dist	6,779	14.1%	716.8	9.5	786.4	8.6	65	104	44.7	151
Arlington VA Pub Sch	2952	13.9%	343	8.6	262	11	38	77	22	134
Austin Pub S D	9,450	11.7%	802	11.8	912.8	10.4	88.7	107	54.5	173
Baltimore City Publ Sch	12,719	16.5%	999.5	12	429	21	92	140	NA	NA
Baltimore County P Sch	12,127	11.4%	1025.4	11.8	2305	29.6	187.5	92	145.7	87
Boston Public Schools	10,478	19.9%	1293	8.1	1104	9.5	133.4	79	63.6	165
Bellevue, WA SD	1,947	10.3%	82.7	23.5	118.6	16.4	17.4	112	17.3	112.5
Bridgeport, CT	2,618	14.3%	204	13	254	10	25	105	33	79
Buffalo Public Schools	7744	16.6%	753	10.3	439	17.6	109	71	62	125
Cambridge Publ Schools	1,200	20%	176	7	103	12	20	60	22	55
Carpentersville, IL	3,139	15.8%	227	13.8	380	8.3	43	73	28	112
Chicago Public Schools	54,376	13.7%	4,649	11.7	4,228	12.9	390	139	261	208
Cincinnati Pub Schools	8,928	17.4%	457	19.5	801	11.1	62	144	57.7	155
Clark Cty School Dist	40,067	12.5%	3,260	12.3	1,952.8	20.5	390.5	102.6	187.5	214
Cleve Hts- Univ Hts Cty	1,100	18%	83	14	58	19	7	158	8	NA
Cleveland Metropolitan	8,350	21.4%	855	9.8	486	17.2	81	103	82	102
Columbus City, OH	9,727	18.1%	650	15.0	990	9.8	64	152	78	125
Compton CA Unified SD	2981	11.2%	126	28	118	25	5	596	14	213
Dallas, TX	13,470	9.1%	1,078	12.5	868.5	15.5	81	166	37	364
DeKalb 428, IL	879	14.1%	58	15.2	205	4.3	9	98	7.5	117
DesMoines Public Scs	4,854	15.3%	493*	9.8	358.5	13.5	37.3	130	11.5	422
D.C. Public Schools	8,603	18%	669	13	653	14	90	96	78	111
Davenport Comm Sch	1,857	12%	188	10	287	7	NA	NA	NA	NA
Deer Valley Unified SD	3,289	9%	190	18	229	15	49	68	108	31
Denver Public Schools	9,142	12%	592	16	528	18	94	98	98	94
Detroit Public Schools	8,731	16.1%	535.8	16	458	19	98	89	40	218
ESD 112	1,987	14%	55	37	158	13	20	100	12	166
Elgin U-46, IL	5,304	13.1%	252.8	21	288.5	18	71.9	74	20	265
Everett Pub Schools, WA	1,049	17%	74	15	51	21	4	263	5	210
Fort Worth	6,144	8%	520	12	450	14	73	85	31	199
Fresno, CA	8,271	11.2%	509.6	16.2	603.1	13.7	75.5	110	65.7	126
Greenville County, SC	9,894	14%	463	21	376	26	93	106	25	396
Guilford County, SC	10,062	12.8%	575	17.8	448	22.5	127.7	79	52.33	192
Houston Independ SD	15,655	7.3%	3,159	5.0	3,158	5.0	160	98	150**	104
Jackson County FL	2,740	11.3%	193	14.2	89	30.8	25	119	110***	274
Kalamazoo Pub Schools	1,667	14%	70	24	79	22	15	112	NA	NA
Kent, WA Pub Schools	3,069	11.3%	148.7	20.6	318	9.7	32.3	95	25	123
Lake Washington, WA	3,145	11.7%	155.1	20.3	241.5	13.0	32.6	96.5	24.7	127.3
Kyrene School District	1,544	9%	141	11	124	13	27	58	14	111
Lakota Local	1,800	10%	126	15	120	15	39	47	18	100
Los Angeles Unified SD	71,969	13.1%	4900.9	14.7	6019.9	12.0	328	219	557	129
Madison, WI Pub Schools	3,808	14.0%	347	10.9	448	8.5	86	44	49	77.7
Marlborough Pub Sch	1,198	25%	141	9	115	11	7	172	4	300
Memphis City	16,637	15%	912	19	655	26	53	314	58	287
Miami-Dade	40,012	11%	2,500	17	1,226	33	209	192	206	195
Milwaukee	16,406	20.9%	1281	13	988	16.6	169	80	136	121
Montgomery Cty Sch	17,226	12%	1,588	11	1,398	13	293	59	97	178
Naperville IL 203	1978	11%	150	13	237	8	33	59	22	90
Nashville	10,141	12.3%	680.5	14.9	594	17.1	109	93	65.5	155
New Bedford	2,655	21%	204	14	205	13	26	103	9	295
N. Chicago, IL (in Dist.)	614	16%	39	15.7	27	22.7	8	76.8	5	122.8
Oakland Unified SD	5401	14.0%	404	13.4	175	31	47	115	43.5	125
Oak Park Sch Dist 97	875	16%	78	12	90	10	14	63	8	110
Omaha, NE	9,149	17.2%	485	18.9	470.5	19.4	85	108	33	281
Orange County, FL	24,385	11.1%	NA	NA	1,165	20.9	202	121	99.5	245

Improving Special Education Services in the Omaha Public Schools

	% IEPs of All Students		Sp Ed Teachers		Paraeducators		Speech/Lang Path		Psychologist	
	# IEPs	% IEPs	FTE	Ratio	Number	Ratio	FTE	Ratio	FTE	Ratio
Pinellas County, FL	14,701	13.0%	881	16.7	774	19.0	150	98	79	187
Pittsburgh Pub Schools	4,210	18.1%	308	13.7	263	16	31	136	16	263
Portland Public Schools	7,168	14.5%	282.5	25.4	414	17.3	99.6	72	59.3	121
Providence, RI	4460	18.8%	340	13	339	13	40	111	28	159
Renton, WA	2,108	14.7%	129	16.3	294	7	20	105	15	140
Rochester, NY	5,472	20%	559.2	9.8	428	12.8	148	37	64	85.5
Rockford IL Pub S	4,065	14%	336	12	334	12	49	83	24	169
Round Rock	3,313	8%	369	9	171	20	41	81	29	115
Sacramento	6,519	13.9%	288.1	22.6	246.2	26.5	33	128	50.8	197.5
San Diego Unified SD	16,300	12%	1,100	15	1,300	13	196	84	129	126
Saugus, MA	462	15%	28	17	29	16	6	77	NA	NA
Sch Dist of Philadelphia	33,686	20%	1,535	22	610	56	99	341	100	337
Scottsdale, AZ	2,891	10.9%	246	11.8	230	12.6	39.4	73	28.4	102
Seattle, WA	7,281	12.5%	548.8	13.3	823.3	8.8	82.2	89	60.2	121
Shelby Cty-Memphis	14556	12.7%	852	17.1	768	19.0	55	265	60	243
St. Paul, MN	7,152	18.8%	523	13.7	536	13.3	97	74	19	376
Stockton, CA	4,436	11.2%	258	17.2	344	12.9	47	94.0	36	123
Sun Prairie Area S Dist	697	10%	62	12	93	8	14	50	7	100
Tacoma Pub Schl WA	3,894	12%	172.5	23	223	17	33.6	116	27	144
Tucson Unified SD	8,092	14%	409	20	419	20	61	133	54	150
Washoe County Dist, NV	8,551	14%	472	19	325	27	77	112	37	232
Williamson Cty Schl	2,824	9%	213	13	400	7	34	121	23	178
West Aurora, IL SD	1688	13%	120	14	101	17	21	80	13	130
Worcester, MA	5,172	21%	254	21	366	15	38	137	NA	NA
Averages		14.0%		13.9		14.4		119		172

* The Urban Special Education Leadership Collaborative and the Council of the Great City Schools, including its team members who conducted school district special education reviews, collected the data reported in these tables. *The data do not give precise comparisons, so the results need to be used with caution.* District data are not consistently reported (e.g., some districts include contractual personnel and others may exclude them) and are sometimes affected by varying placement types used by a school district. The data may count all students with IEPs, including those placed in charters, agencies, and nonpublic schools. Still, these data are the best available and are useful as a rough guide to staffing ratios.

** Data includes psychologists and educational diagnosticians.

Improving Special Education Services in the Omaha Public Schools

Ratios for Social Workers, Nurses, OTs & PTs	# IEPs	Social Workers		Nurses (School/RN)		Occupational Therapists		Physical Therapists	
		Number	Ratio	Number	Ratio	Number	Ratio	Number	Ratio
Agawam Pub Schools	656	NA	NA	8	82	3	219	3	219
Anchorage School Dist.	4,950	NA	NA	112.8	60	21.9	309	7.8	869
Albuquerque School District	16,738	98.5	169.9	N/A	N/A	65.3	256	22.7	737
Atlanta Public Schools	6,779	30	165	58	85	12	413	3	1650
Arlington Pub Schools	2952	15	197	*30	98	20	147	6	492
Austin Pub S D	9,450	NA	NA	NA	NA	12.6	751	12	760
Baltimore City Public	12,719	194.1	66	NA	NA	38	335	11	1156
Baltimore County Pub Sc	12,127	48.7	249	179.8	67	65.2	186	27	449
Bellevue, WA SD	11,534	4	487	13.2	148	5.3	367	5.3	367
Boston Public Schools	1,293	52.1	201	128	82	60	175	21	499
Bridgeport, CT	2,618	38	69	28	94	7	374	2	1309
Buffalo Public Schools	7744	48.5	160	NA	NA	75	103	29	267
Cambridge Pub School	1,200	16	75	0	NA	16	75	7	172
Carpentersville	3,139	36.5	86	27.5	114	22	142	6	523
Chicago Pub Schools	54,376	355.7	142	334	151	115	440	35	1445
Cincinnati Pub Sch	8,928	NA	NA	NA	NA	19	470	5	1786
Clark Cty School Dist	40,067	NA	NA	194.5	206	69.5	577	28	1431
Cleve Hts-UnivHtsCty	1,100	7	158	5	220	2	550	1	1100
Cleveland Metropolitan	37,890	NA	NA	69	113	36	216	9	864
Columbus City, OH	9,727	36	270	103	94	43	226	24	405
Compton CA Unified SD	2981	1	2981	1	2981	1.5	1987	.5	5962
Dallas	13,470	7	1924	NA	NA	14.5	929	4	3368
DeKalb 428, IL	879	8	110	7	126	3.4	256	1.3	204
DesMoines Public Schls	4,854	25.8	188	58.4	83	7	693	4.8	1011
D.C. Public Schools	8,603	90	96	127	68	48	180	16	538
Davenport CommSch	1,857	NA	NA	7	266	NA	NA	NA	NA
Deer Valley Unified SD	3,289	NA	NA	37	89	19	174	4	823
Denver Public Schools	9,142	74	124	77	119	25	366	12	762
Detroit Public Schools	8,731	76	115	38	230	31.6	276	10	873
Elgin U-46, IL	1,987	56	95	59.5	89	25.2	210	4	1326
ESD 112	5,304	NA	NA	5	398	6	332	3	663
Everett Public Schools	1,049	2	525	11	96	2	525	3	350
Fort Worth	6,144	NA	NA	106	58	16	384	10	615
Fresno, CA	8,271	33.5	247	53.1	1156	3	2757	NA	NA
Greenville County, SC	9,894	20	495	132	75	14	707	4	2574
Guilford County, SC	10,062	75	134	39	258	24.7	407	11	958
Houston Independence SD	15,655	NA	NA	NA	NA	NA	NA	NA	NA
Jackson County, FL	2,740	25	110	BA	NA	6	457	3	913
Kalamazoo Pub	1,667	5	334	2	834	4	417	3	556
Kent, WA Pub Schools	3,069	2.2	NA	NA	NA	12.8	240	4.8	639
Kyrene School District	3,145	NA	NA	4	386	2	772	2	772
Lake Washington SD	1,544	NA	NA	23.6	133	19.3	163	3.3	953
Lakota Local	1,800	6	300	14	129	8	225	2	900
Los Angeles Unified SD	71,969	361.6	199	590.6	122	189.9	379	41	1743
Madison, WI Public Schls	3,808	68	56	38	100	34	112	13	293
Marlborough Public	1,198	9	134	10	120	4	300	2	599
Memphis City	16,637	55	303	68	245	11	1513	9	1849
Miami-Dade	40,012	NA	NA	206	195	65	616	23	1740
Montgomery CtySch	16,406	NA	NA	NA	NA	112	154	61	283
Milwaukee	17,226	140	117	101	162	30	547	13	1262
Naperville, IL 203	1978	27	73	29	68	4	494	3	659
Nashville	10,141	NA	NA	57	178	29.5	344	6	1690
New Bedford	2,655	67	40	30	89	11	242	3	885
North Chicago, IL	875	10	61.4	NA	NA	3.6	170.5	1.6	383.8
Oak Park Sch Dist 97	614	12	73	8	110	7	1125	1	875
Omaha, NE	9,149	56	163	74	124	NA	NA	NA	NA
Orange County, FL	24,385	67	364	108	226	10.5	2322	7	348
Pittsburgh Pub Sch	5401	40	105	40.6	104	7	601	8	526

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	# IEPs	Social Workers		Nurse		Occupational Therapists		Physical Therapists	
		FTE	Ratio	FTE	Ratio	FTE	Ratio	FTE	Ratio
Portland, OR	7,168	14	512	NA	NA	20.2	355	5.3	1352
Oakland Unified SD	4,210	19	284	30.8	175	12	450	2	2701
Pinellas County, FLa	14,701	108	136	128	115	56	263	23	650
Portland Pub Schools	6,513	10	652	NA	NA	20	326	9	724
Providence	4460	35	127	NA	NA	11.5	388	4.5	991
Renton, WA	2,108	0	NA	17	124	15	141	3	703
Rockford IL Pub S	5,472	26	135	32	127	12.5	325	4.5	903
Rochester, NY	4,065	89	61.5	55.5	98.6	29.2	187.4	11	497.5
Round Rock	3,313	NA	NA	1	NA	10	332	3	1105
Sacramento	6,519	8	NA	5*	NA	2	NA	0	NA
San Diego Unified SD	16,300	NA	NA	129	127	40	408	10	1630
Saugus, MA	462	4	116	5	93	2	231	1	462
Schl Dist of Philadelphia	33,686	NA	NA	280	121	20	1685	20	1685
Scottsdale, AZ	2,891	NA	NA	31	93	13.8	210	3.8	761
Seattle, WA	7,,281	NA	NA	NA	NA	44	165	11	662
Shelby County (Memphis)	14556	66	221	79	184	29.22	498	12.84	1134
St. Paul Pub Schools	7,152	92	78	33	217	36	199	12	596
Stockton, CA	4,436	3	1479	22.3	199	3	1479	1.6	2773
Sun Prairie Area S Dist	697	8	88	1	NA	5	140	2	349
Tacoma Pub Sch (WA)	3,894	NA	NA	1.2	NA	19	205	11	354
Tucson Unified SD	8,092	26	312	53	153	10	810	4	2023
Washoe Cty Sc Dist	8,551	NA	NA	35	248	12	713	7	1222
West Aurora SD, IL	2,824	19	89	7	241	11	154	7	241
Williamson Cty Schl	1688	NA	NA	37	111	22	187	5	819
Worcester	5,172	NA	NA	NA	NA	12	431	5	1035
Averages			260		171		380		1,020

Improving Special Education Services in the Omaha Public Schools

Percent Students with IEPs of Total Enrollment & Students with IEPs to Staff Ratio in Ascending Order

Rank	% IEPs	Special Educators	Paraeducators	Speech/Lang Pathologists	Psychologists	Social Workers	Nurses	Occupational Therapists	Physical Therapists
1	8%	7	4.3	26	31	26	58	64	128
2	8%	7	5.26	37	55	40	60	75	172
3	9%	8.6	6.3	44	64	56	62	103	219
4	9%	9	7	44	77.7	61	64	112	241
5	9%	9	7	47	85.5	67	67	140	283
6	9%	9.1	7	50	79	69	68	141	293
7	10%	9.5	7	58	90	73	75	142	349
8	10%	9.8	7	59	94	73	82	147	350
9	10%	9.8	8	59	100	75	83	154	354
10	10%	10	8	60	100	78	85	154	367
11	10.3%	10	8	63	102	82	89	163	384
12	11%	10	8.3	65	104	86	89	171	449
13	11%	10.3	8.5	68	110	88	89	172	462
14	11%	10.9	8.6	71	110	89	93	174	492
15	11%	11	9.7	71	111	95	93	180	498
16	11.2%	11	9.7	73	111	96	94	186	523
17	11.2%	11	10	73	112	105	96	187	526
18	11.3%	11	10	74	113	115	98	18	538
19	11.4%	11.4	10	74	115	116	98.6	199	556
20	12%	11.7	11	76	117	124	100	205	596
21	12%	12	11	77	121	126	104	210	599
22	12%	12	11.1	78	123	127	110	211	615
23	12%	12	12	79	123	134	111	216	620
24	12%	12	12	80	124	135	113	219	639
25	12%	12	12.6	80	125	140	114	225	659
26	12%	12	12.8	80	127	142	115	231	663
27	12.3%	12.3	12.9	81	128	153	119	240	676
28	12.69%	12.5	12.9	83	129	158	119	242	680
29	12.5%	13	13	84	130	160	120	256	703
30	12.7%	13	13	85	134	163	121	276	724
31	13%	13	13	89.1	138	170	124	265	737
32	13%	13	13	93	140	188	126	285	761
33	13.1%	13	13	94	142	197	127	300	762
34	13.7%	13	13	95	144	221	127	309	772
35	13.9%	13.4	13	95	150	249	129	325	819
36	14%	13.7	13	96	151	284	133	326	823
37	14%	13.8	13	96.5	154	300	142	332	864
38	14%	14	13	98	155	300	144	332	869
39	14%	14	13.5	100	155	303	148	344	873
40	14%	14	14	102.6	159	312	153	366	875
41	14%	14	14	103	166	334	155	367	885
42	14%	14	14	103.6	169	384	162	374	900
43	14%	14	15	104	171.5	487	163	384	903
44	14%	14	15	105	178	495	165	388	953
45	14%	14.9	15	105	178	525	175	408	991
46	14.1%	15	15	106	179	652	178	413	1011
47	14.1%	15	16	108	195	673	184	417	1079
48	14.7%	15	16	111	198	705	186	424	1035
49	15%	15	16	111	199		195	431	1100
50	15%	15.2	16.4	112	208		199	450	1100
51	15%	15.7	16.6	112	210		206	470	1105
52	15.3%	16.0	16.6	112	213		217	473	1134
53	15.4%	16.3	17	114	213.7		230	474	1222
54	16%	16.3	17	115	218		220	477	1262
55	16%	17	17.1	116	219		241	494	1309
56	16%	17	17.6	117	223		245	498	1326

Improving Special Education Services in the Omaha Public Schools

Rank	% IEPs	Special Educators	Paraeducators	Speech/Lang Pathologists	Psychologists	Social Workers	Nurses	Occupational Therapists	Physical Therapists
57	16.2%	17	18	121	225		248	518	1431
58	17%	17.1	18	127	232		266	525	1488
59	17.3%	17.2	18.4	128.3	233		386	547	1532
60	17.7%	18.9	19	130	240		398	550	1553
61	18%	19	19	133	243		700	577	1630
62	18%	19	19.4	135	263		834	601	1650
63	18%	19	20	136	265			616	1685
64	18%	19	20	137	281			644	1690
65	18.1%	19.5	20	139	295			693	1740
66	19%	20	20.5	140	300			702	1786
67	19%	20.3	21	144	319			713	1849
68	19.3%	20.6	21	158	337			772	2023
69	19.4%	21	22	172	376			810	2187
70	20%	21	22	192	396			1029	2574
71	20%	21	24	218				1125	2574
72	20%	22	25	263				1479	2701
73	20.4%	22.6	26	265				1513	2773
74	20.5%	23	26	314				1685	2941
75	20.9%	23.5	27	341					
76	21%	24	31	596					
77	21%	24	33						
78	21%	37	56						
Avg.	13.7%	14.1	14.4	119	171	247	165	377	1,008

Appendix C. Data Reviewed

In response to the Council of the Great City School's data request, OPS provided data regarding the following—

1. **Graduation rate** for all students AND for students with IEPs for last five years.
2. **Drop-out rate** for all students AND for students with IEPs for last five years.
3. **Enrolled students.** Number of enrolled students by **school grade level** (by preschool, elementary, and high school), including any placed in a special school operated by the district or out of district to implement an IEP.
4. **Disability area.** Number of students with IEPs **by school grade level** and by specific learning disability (SLD), speech/language (S/L), other health impaired (OHI), autism, emotional disturbance (ED), intellectual disability (ID), developmental disability (DD), and other.
5. **Section 504 & Health Plans.** Number of students with Section 504 plans and number of students with health plans who do not have Section 504 plans, **by grade.**
6. **Enrolled students by race/ethnicity.** Number of enrolled students by race/ethnicity **by school grade level.** Same for black males and Hispanic males.
7. **IEPs by race/ethnicity & disability.** Number of students with IEPs by race/ethnicity and by LD, S/L, OHI, autism, ED, ID, DD, and other. Same for black males and Hispanic males. **By school grade level.**
8. **Enrolled ELs.** Number of English Learners (ELs) and number of long-term ELs enrolled **by school grade level.**
9. **ELs with disabilities.** Number of ELs and number of long-term ELs with IEPs by LD, S/L, OHI, autism, ED, CD, DD, and other by **school grade level.**
10. **Referral for initial special education evaluation.** During 2018-19 school year.
 - Referred for an initial evaluation.
 - Evaluated with a completed evaluation, and
 - Found to need special education, by disability area (LD, S/L, OHI, autism, ED, CD, DD, and other)
11. **Performance.** For all students with IEPs assessed, percentage meeting/exceeding proficient standard in reading and math performance for the last five school years. If assessments changed during this period, explain when they changed and any impact on results. (*Sort by non-charter/charter schools.*)
 - a. **Alternate assessments.** Number of students taking an alternate assessment. (Sort by non-charter, and charter if data is available.)
12. **Educational settings**
 - a. **For students 6 years of age/above:**

- i. Number of students with IEPs in general education 80% or more of the time, between 40-79% of the time, less than 40% of the time, and in separate schools. *For separate schools, indicate the number of students in any district special school, another district's special school(s), and/or nonpublic school(s). (Special school is a school attended only by students with IEPs.)*
 - ii. Same as "i" by LD, S/L, OHI, autism, ED, ID, and other
 - iii. Same as "i" by school grade level
 - iv. Same as "i" by race/ethnicity, and by EL and by long-term EL
- b. For students 3-5 years of age with IEPs**, the total number of students, and the number receiving majority of special education/related services in:
1. The regular early childhood program
 2. A separate special education class or school
 3. All other educational settings
- 13. Out-of-school suspensions.** For 2018-19, number of students with AND without IEPs who were suspended, and by race/ethnicity.
- 5 or fewer school days
 - 6-10 school days
 - 11-20 school days, 21-30 school days, etc.
- 14. Personnel.** Number of all budgeted FTE staff (including contractual) and vacant positions in the following areas. Also, describe expectations for shortage changes for the 2020-21 school year because of COVID-19 impact.
- Special education teachers
 - Paraprofessionals (only for students with IEPs.) Provide titles/hours of work for paraprofessional groups if they vary.
 - Psychologists
 - Speech/language Pathologists
 - Social Workers
 - Nurses
 - Occupational Therapists, including any assistants.
 - Physical Therapists, including any assistants.

Appendix D. Strategic Support Team

The following were members of the Council's Strategic Support Team on special education who conducted this review for the Omaha Public Schools.

Sue Gamm, Esq.

Sue Gamm, Esq., is a special educator and attorney who has spent more than 40 years specializing in the study and understanding of evidence-based practices, policies, and procedures that support a systemic and effective education of students with disabilities and those with academic and social/emotional challenges. Ms. Gamm has blended her unique legal and special education programmatic expertise with her experiences as the chief specialized services officer for the Chicago Public Schools, attorney and division director for the Office for Civil Rights (US Department of Education) and special educator to become a highly regarded national expert as an author, consultant, presenter, and evaluator. Since her retirement from the Chicago Public Schools in 2003, has been engaged in 30 states and the District of Columbia with more than 50 school districts and five state educational agencies working to improve the instruction and support provided to students with disabilities. Twenty-one of these reviews were conducted through the auspices of the Council of the Great City Schools. Ms. Gamm has written standard operating procedure manuals for special education practices and multi-tiered systems of support (MTSS) for more than 10 school districts, and has shared her knowledge of the IDEA, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act and related issues at more than 70 national, state and local conferences. Ms. Gamm has authored/co-authored numerous periodicals and publications, including those focused on MTSS, disproportionality for special education, responding to OCR investigations, and assessment. She also testified before Congressional and Illinois legislative committees. Ms. Gamm has served as a consulting attorney on several of the Council's *amicus* briefs focusing on special education that were submitted to the U.S. Supreme Court. 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 special education disproportionality. Ms. Gamm has also been recognized for her legal expertise in special education through her engagement as an expert witness or consultant involving nine special education federal class action or systemic cases. She is admitted to practice before the Illinois Bar, the Federal Bar, and the U.S. Supreme Court Bar.

Julie Wright Halbert, Esq.

Julie Halbert has been legislative counsel for the Council of the Great City Schools for over 22 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 reauthorizations 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 strategic review teams, including special education reviews in the Anchorage, Austin, Boston, Chicago, Charleston, Cincinnati, Des Moines, District of Columbia, Guilford County (NC), Memphis, New York City, Richmond, Philadelphia, Pittsburgh,

Providence, and St. Louis. Working with national experts Sue Gamm and Judy Elliott, she has published a Council national white paper on the implementation and development of MTSS, Multi-Tiered Systems of Supports for our nation's urban school districts. Ms. Halbert most recently, January 2017, took the lead working with our cities in the development of the Council's amicus brief to the Supreme Court of the United States in *Endrews v. Douglas County School District*, on determining the educational benefit standard due by our districts to students with disabilities when implementing their IEPs. This case is certain to be one of the most important cases since *Rowley* decided over thirty years ago. She 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. Additionally, for the past year, together with Husch Blackwell partner John Borkowski, Ms. Halbert is assisting to develop and implement national legal webinars for urban district's counsel and key staff on emerging legal issues for the Council's districts. They include Civil Rights Priorities at the End of One Administration and Beginning of Another, Hate Speech, Micro-aggressions and Student First Amendment Rights.

Appendix E. About the Council and History of Strategic Support Teams

The Council of the Great City Schools is a coalition of 76 of the nation's largest urban public-school systems.⁴¹ 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 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 centers on urban schooling.

The mission of the Council is to advocate for urban public education and to assist its members to improve and reform. The Council provides services to its members in the areas of legislation, research, communications, curriculum and instruction, and management. The group also 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, instruction, 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, DC. Since the organization's founding, geographic, ethnic, language, and cultural diversity has typified the Council's membership and staff.

⁴¹ Albuquerque, Anchorage, Arlington (Texas), Atlanta, Aurora (Colorado), Austin, Baltimore, Birmingham, Boston, Bridgeport, Broward County (Ft. Lauderdale), Buffalo, Charleston, Charlotte-Mecklenburg, Chicago, Cincinnati, Omaha (Las Vegas), Cleveland, Columbus, Dallas, Dayton, Denver, Des Moines, Detroit, Duval County (Jacksonville), El Paso, Fort Worth, Fresno, Guilford County (Greensboro, N.C.), Hawaii, Hillsborough County (Tampa), Houston, Indianapolis, Jackson, Jefferson County (Louisville), Kansas City, Long Beach, Los Angeles, Manchester (New Hampshire), Miami-Dade County, Milwaukee, Minneapolis, Nashville, New Orleans, New York City, Newark, Norfolk, Oakland, Oklahoma City, Omaha, Orange County (Orlando), Palm Beach County, Philadelphia, Pinellas County, Pittsburgh, Portland, Providence, Puerto Rico, Richmond, Rochester, Sacramento, San Antonio, San Diego, San Francisco, Santa Ana, Seattle, Shelby County (Memphis), St. Louis, St. Paul, Stockton, Toledo, Toronto, Tulsa, Washington, D.C., Washoe County (Reno), and Wichita.
