IMPROVING SPECIAL EDUCATION SERVICES IN THE PITTSBURGH PUBLIC SCHOOLS

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

Submitted to the Pittsburgh Public Schools



By the Council of the Great City Schools

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

First, we thank Superintendent Mark Roosevelt. It is not easy to ask one's colleagues for the kind of review conducted by our team. It takes courage and openness, and a real desire for change and improvement. He has these qualities in abundance.

Second, we thank the school board of the Pittsburgh Public Schools, who approved the school system's conduct of this review. We hope that this report meets your expectations and can serve as a tool for continuing to improve services across the system.

Third, we thank the members of the school district staff, especially Dr. Patricia Gennari, Assistant Superintendent of Special Education and Support Services, and Mary Jane Conley, Senior Program Coordinator for Students with Exceptionalities, who organized the team's interviews, school visits, and all the documents and data that we needed to do our work. These individuals spent many hours coordinating focus groups, submitting documents, and attending to the many details involved in putting together this assessment.

Fourth, the Council thanks the parents, professionals, and advocates with whom we met. They work passionately to support children and see that the district serves students with disabilities in the best possible manner.

Fifth, the Council thanks the Philadelphia and Broward County school districts for contributing staff members to this effort. The enthusiasm and generosity of these districts serve as further examples of how the nation's urban public school systems are banding together to help each other improve performance for all students.

Finally, I deeply appreciate the work of Julie Wright Halbert, legislative counsel for the Council of the Great City Schools, who guided the work of the team, and Sue Gamm, a nationally known expert in special education, who worked with Ms. Halbert to prepare the final report. Their work was outstanding and critical to the success of this effort. Thank you.

Michael Casserly Executive Director Council of the Great City Schools

CHAPTER 1. OVERVIEW AND BACKGROUND

The Pittsburgh Public Schools (PPS) is the second-largest public school system in Pennsylvania. The state has only one other major big-city school system—Philadelphia's. According to PPS data, the district enrolled some 26,123 students six years of age or older in elementary, middle, and high school in the 2009-10 school year. About 56.3 percent of the district's students are African American; 35.0 percent are white; 1.3 percent are Hispanic; 1.9 percent are Asian American; and 5.5 percent other racial or ethnic, or multiracial. The district has seen a decline in enrollment over the last decade, dropping from 40,181 students in FY 1998 to 26,163 this school year. This school year's decline of 526 students (2 percent), however, was the lowest decline during this period.

About 19.2 percent of the approximate 26,000 students in the PPS are students with disabilities. The school system's proposed budget for special education in 2009-10 is \$82,378,108 or about \$2.5 million less than last year.

In addition, about 71 percent of the district's enrollment is composed of students who are eligible for a federal free or reduced-price lunch subsidy. Also of special interest is the fact that students enrolled in the district's 66 schools represent 57 different nationalities.

The district is governed by a school board of nine members who are elected to four-year staggered terms. Each member represents a different area of the city. The board operates with three standing committees—budget/finance, education, and minority and women-owned business enterprise (MWBE)—and is the policy-making body of the city's school system.

The board of directors hires a superintendent of schools, who is responsible for overseeing the operations of the school district. The current superintendent, Mark Roosevelt, was brought on board in 2005 with the primary goal of improving student achievement. Since coming to Pittsburgh, he has implemented a new and more rigorous pre-K-12 curriculum; developed a nationally recognized program to recruit, train, support, and compensate principals as instructional leaders; placed instructional coaches in every school; and expanded early childhood options. He was also instrumental in developing an innovative college scholarship program and bringing sizable and important new external investments into the district. Since he came on board, the school district has emerged from Adequate Yearly Progress (AYP) sanctions under *No Child Left Behind*.

The school district has made substantial gains in student achievement over the last several years, significantly increasing the numbers of students at the proficient level in reading and mathematics and decreasing the numbers scoring below basic on the Pennsylvania System of School Assessment (PSSA). In addition, the district is making progress in reducing racial disparities on state test results.

The school board and superintendent's educational reforms are spelled out in the district's strategic plan, a six-year roadmap (2008-2014) outlining priority areas for improving the academic performance of all students in the district. The plan, called *Excellence for All*, is grounded in the belief that all children can learn at high levels. It aims to move all children

forward academically at each level of achievement. Notably, the plan expects academic improvements for all students, but it gives special attention to accelerating the learning of African American students by setting targets of five percentage-point gains per year for this group, compared with students of other races.

In 2007, the PPS also initiated a comprehensive program for principals called the Pittsburgh Urban Leadership System for Excellence (PULSE). The program was designed to recruit, train, support, evaluate, improve, and compensate principals. It is funded through a \$7.4 million Teacher Incentive Fund grant. PULSE is grounded in the belief that school leadership is the foundation for the district's reform agenda. Thus, it establishes a new principal accountability, evaluation, and compensation process based on student results.

More recently, the PPS received a \$40 million grant from the Bill & Melinda Gates Foundation to implement the district's Empower Effective Teachers program. The new program is designed to improve student achievement and get students college-ready by ensuring that each classroom has a highly effective teacher. The district also is receiving additional funding from the foundation to support research over the next two academic years to develop fairer and more accurate indicators and measures of effective teaching.

An innovative program called The Pittsburgh Promise is a cornerstone of the PPS' efforts to ensure that all students graduate from the district college-ready. The citywide program provides college scholarships to eligible graduates of the city's public schools. It was created by The Pittsburgh Foundation and funded through the University of Pittsburgh Medical Center, foundations, corporations, and individuals in the Pittsburgh community. Last year, 757 graduates (67 percent of eligible students) won Promise scholarships.

Among its many other initiatives, the PPS is working to improve its services to the city's students with disabilities. The leadership of the Pittsburgh Public Schools requested that the Council of the Great City Schools review the school system's special education services as part of the district's efforts to strengthen education for *all* students. This report presents the Council's findings, along with recommendations to strengthen the district's general education interventions and special education services for its students with disabilities.

The process that the Council used to conduct the review is described in the next chapter. Subsequent chapters lay out the organization's observations and proposals for improving the overall delivery of services for students with academic and behavioral challenges and for students with disabilities.

CHAPTER 2. PURPOSE AND ORIGIN OF THE PROJECT

Mark Roosevelt, Superintendent of the Pittsburgh Public Schools, and Assistant Superintendent Patricia Gennari asked the Council to review the district's services for students with disabilities and make recommendations for improvement. The goals of this review were to—

- Examine the overall effectiveness of the central-office special education organizational structure
- Review the school district's curriculum, professional development, behavior management, and other instructional strategies to determine how they were meeting the needs of students with disabilities
- Analyze the operational and instructional efficacy of the school district's provision of special-education services, and
- Recommend strategies for improving the overall effectiveness of services to students with disabilities.

The Work of the Strategic Support Team

The Council assembled a team of experts, who have been successful in administering special education programs and services in their respective urban school districts. These individuals also had firsthand expertise with the reauthorization of the Individuals with Disabilities Education Act (IDEA) and were well-versed in federal law and programmatic practice. The team visited the district on November 17-20, and analyzed the district's organizational structure, accountability systems, curriculum and instructional strategies, individualized education program (IEP) implementation issues, and other features of the district's programs serving students with disabilities. The team briefed the superintendent at the end of its visit and presented preliminary findings and proposals.

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

First, it allows the superintendent and members of his or her staff to work with a diverse set of talented, successful practitioners from around the country.

Second, the recommendations from urban school peers have power because the individuals who developed them have faced many of the same challenges encountered by the district requesting the review. No one can say that these individuals do not know what working in an urban school system is like or that their proposals have not been tested under the most rigorous conditions. Third, using senior urban school managers from other urban school communities is faster and less expensive than retaining large management-consulting firms that may have little to no programmatic experience. The learning curve is rapid, and it would be difficult for any school system to buy the level of expertise offered by these teams on the open market.

Finally, the teams comprise a pool of expertise that superintendents may call upon for advice or help in implementing the recommendations made in the teams' reports, meeting new challenges, and developing alternate solutions.

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

SUE GAMM, ESQ. Former Chief of Specialized Services Chicago Public Schools	LEAH KELLY Executive Director of Student Support Services Broward County Public Schools
DR. BRENDA B. TAYLOR,	JULIE WRIGHT HALBERT, ESQ.
Deputy Superintendent of Specialized	Legislative Counsel
Instructional Services	Council of the Great City Schools
School District of Philadelphia	

Contents of this Report

The Strategic Support Team of the Council of the Great City Schools spent many hours interviewing parents, advocates, related-services staff members, special education teachers, principals, Pennsylvania state board of education staff members, and central-office administrative leaders with responsibility for both special and general education. The team also reviewed studies, data, and other special education reports pertaining to the Pittsburgh Public Schools (PPS).

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

- A. Incidence of Students with Disabilities
- B. Performance & Instruction of Students Receiving Special Education Services
- C. Organizational Structure & Staffing to Support Special Education Services
- D. Response to Intervention (Academic and Behavior Supports)
- E. Effectively Educating Students with Disabilities in the Least Restrictive Environment
- F. Fiscal Issues
- G. Accountability

Chapter 4 summarizes all recommendations from the report. And Chapter 5 presents a brief synopsis of the report and a discussion.

Appendix A compares incidence rates and staffing ratios in various city school systems across the country. Appendix B provides organizational information and a proposed structure for

the division of Students with Exceptionalities. Appendix C lists individuals whom the team interviewed individually or in groups. Appendix D identifies documents reviewed by the team. Appendix E shows the team's site visit agenda. Appendix F presents brief biographical sketches of team members. Appendix G 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 ten years.

CHAPTER 3. FINDINGS & RECOMMENDATIONS

This chapter presents the findings and recommendations of the Council's Strategic Support Team based on its interviews, analysis of data, and examination of documents. The team's findings and recommendations are presented in seven broad areas, including—

- A. Incidence of Students with Disabilities
- B. Performance & Instruction of Students Receiving Special Education Services
- C. Organizational Structure & Staffing to Support Special Education Services
- D. Response to Intervention (Academic & Behavioral Supports)
- E. Effectively Educating Students in the Least Restrictive Environment
- F. Fiscal Issues
- G. Accountability Framework

For each category, the team identified both positive developments and areas of concern. It then followed up its observations with a series of recommendations and proposals.

A. Incidence of Students with Disabilities

Background Data. The information below shows the Pittsburgh Public Schools' demographic data on students with disabilities, compared with state and national percentages where available. The data reflects changes in disability rates over time and differences in various disability areas. These data also were analyzed by grade level, race and ethnicity, as shown below.

• *Changes in Disability Rates Over Time.* Based on Pennsylvania's Special Education Data Report for fiscal years 2007 through 2009, the proportion of PPS students receiving special education services decreased somewhat from 20.5 percent in FY 2007 to 19.9 percent in FY 2009. According to current PPS data, the proportion has dropped further—to 18.2 percent.¹ This proportion is closer to the state's average proportion of 15.2 percent (FY 2009) and the national proportion of 13 percent.



Exhibit 1. Change in Percentage of Students with Disabilities (FY 07 to FY 09)

¹ E-mail from Erica Grant, December 4, 2009

• Number of Students Receiving Special Education Services by Grade Level Since FY 2005

As Exhibit 2 shows, the majority of students receiving special education services are at the elementary level. Since 2005 numbers have decreased somewhat at the elementary and middle school levels and increased at the high school level, but since 2008 there have been substantial increases in both elementary and middle school levels.





• **PPS' Disability Areas Compared with State and National Rates.** Although students with learning disabilities (LD) comprise the largest share of students receiving special education services in Pittsburgh, the percentage (33.3) is substantially lower than the percentages at the state (51.0) and national levels (43.4). See Exhibit 3. On the other hand, PPS' percentages in the areas of emotional disturbance (ED) and mental retardation (MR) are substantially larger than those at the state and national levels. In the area of speech/language (S/L), PPS' percentage is higher than Pennsylvania's and substantially higher than the nation's.

	Pittsburgh	PA	US ³
Learning Disabilities	33.3%	51.0%	43.4%
Speech/Language	18.9%	16.3%	9.3%
Emotional Disturbance	16.9%	9.2%	7.4%
Mental Retardation	15.4%	8.1%	8.3%
Other Health Impairment	7.1%	7.0%	10.6%
Autism	5.4%	5.3%	4.3%
Hard-of-Hearing/Deaf	0.9%	1.0%	1.2%
Multiple Disabilities	0.8%	1.0%	2.2%
Vision/Blind	0.7%	0.4%	0.4%
Orthopedic Impairment	0.2%	0.3%	1.0%
Traumatic Brain Injury		0.3%	0.4%
Total	19.2%	13.00%	12.1%

Exhibit 3. Local, State and National Comparison of Students by Disability Area²

² PA Special Education Data Reports

³ December 1, 2007, Child Count Data, IDEA Data.Org at http://www.ideadata.org/PartBTrendDataFiles.asp

• *High Incidence Disability Areas.* The areas of LD, ED, MR, and S/L are frequently referred to as "high incidence disabilities," because they typically comprise the most common disability areas in most school districts. They are also commonly referred to as "judgmental" disabilities, because they are open to varying interpretations of eligibility. As a result, students with similar characteristics may be identified as having varying disabilities or no disability. The exhibit below shows that the PPS' percentages of LD and ED have remained about the same from FY 2007 through FY 2009. The proportion of students with MR, however, increased from 13.2 percent to 15.4 percent over the period.



Exhibit 4. Comparison of Percentage of High Incidence Disabilities in FY 2007 and 2009

If one were to apply state disability incidence patterns for ED, MR, and S/L to the Pittsburgh Public Schools (PPS), 45.6 percent of PPS students with disabilities would have been labeled as LD. This rate would be much closer to the national rate of 43.4 percent.

• Referral and Eligibility Data

Emotional Disturbance. Fifty-two schools in the PPS referred 148 students for possible ED eligibility. Of those referred, 148 (77 percent) were found to have ED. Seven schools referred four or more students. These schools (13 percent of the total) accounted for 34 percent of all students referred. King and Faison referred the most students, 14 and 10, respectively. Only 57 percent of the referred King students were found to have ED, although they may have been found eligible for special education services based on another disability area.⁴

Mental Retardation. Forty schools referred 95 students for possible MR eligibility. Of those referred, 86 (90.5 percent) were found to have MR. Six schools referred four or more students, accounting for 42 percent of all referrals. King, a school solely for students receiving special education services, referred 15 students. Overall, 90.5 percent of students referred were found to have MR.

Learning Disability. Sixty-four schools referred 278 students for possible LD eligibility. Of those referred, 189 (68 percent) were found to have LD. Five schools referred 10 or more

⁴ The information provided did not contain data indicating whether students may have been eligible for special education services based on another disability area.

students. These schools (8 percent of the total) accounted for 25 percent of all students referred. Two of these schools had very small eligibility rates: Allegheny (3 of 10, or 30 percent) and Arsenal (6 of 12, or 50 percent).⁵

Speech/Language. From September 2009 through January 2010, 435 students were screened for a potential speech/language disability. Of these, 126 (29 percent) received general education interventions. Of the 435 students who were screened, 134 (31 percent) received a comprehensive speech/language evaluation and 117 (87 percent) of the 134 students were found to be eligible for special education services in the area of speech/language.

• Disability Rates by Race and Ethnicity.

A risk ratio is a statistical tool that is frequently used to determine the likelihood that students from one racial/ethnic group are identified as needing special education services, compared with students from other groups. Although no uniform national criteria exist for determining when a risk becomes disproportionate, a risk of "2" (twice as likely) suggests a reasonable basis for concern.

An analysis of PPS disability rates by race and ethnicity shows that African American (AA) students are 2.97 times more likely than are other students and 3.23 times more likely than are white students to be identified as ED. White students are least likely to be identified as ED, compared with all other students (0.33 risk ratio). African American students are also 2.03 times more likely than other students to be identified as MR. Of the other five disability areas that states are required to analyze, African American students are least likely to be identified as autistic (0.65 times as likely, compared with all other students). The exhibit below shows these risk ratios.





Note that the Pennsylvania Department of Education (PDE) has not found the PPS to have any disproportionate representation based on inappropriate identification policies, procedures, or practices or to have any disproportionality that is significant under state criteria.

Positive Findings

• Initial Steps to Decrease the Percentage of Eligibility

Given the decrease in the percentage of students eligible for special education services, it is apparent that the PPS has been aware of its relatively high enrollment in special education services and has taken initial steps to address it.

• Initiation of Strong RTI Framework

As will be discussed in more detail in Section D, the PPS' initiation of a strong Response to Intervention (RTI) framework—assuming that it is implemented with fidelity—is likely to reduce the number of students who need special education services.

Areas of Concern

The following areas may affect the percentage of students needing special education services and the type of disability identified.

• Few Schools Referring High Number of Students

According to data discussed above, it appears that some schools refer a disproportionately large number of students for evaluations in the area of ED, MR, and LD. School-by-school data were not available in the area of speech/language. The PPS database does not include information showing the proportion of referrals based on school enrollment or whether a referral was an initial or special evaluation.

• Data Reports

User-friendly data reports are not available for Program for Students with Exceptionalities (PSE) staff members, principals, and others to easily take note of an unusually high percentage of students referred for an evaluation or unusually high disability eligibility rates. Such information would enable staff to follow up and ensure that actions are consistent with PPS policies and procedures.

• Policies, Procedures, and Practices Concerning Eligibility Criteria and Determinations

Mental Retardation. The PPS convened a committee of psychologists to develop criteria for determining whether a student has MR. The criteria developed appear to be based on Pennsylvania Department of Education (PDE) guidelines and accepted principles. However, PPS' percentage of students identified as MR (15.4), which is almost twice as high as the state's (8.1 percent), suggests that there may be varying interpretation and application of the criteria at the school level.

Emotional Disturbance. The PPS also convened a committee to review ED criteria and issued a report. Among 10 recommendations made as "preferred practices," one suggested a review of student documentation to determine response to early-intervening services based on scientific, research-based approaches. However, the report later stated: "as a state-identified, disproportionate district early-intervening services to address behavior are

required." This conflicting information may lead to varying interpretation in the field.

Parental Referral. It was reported that the PPS' practice requires an automatic referral of a student for a special education evaluation whenever a parent requests one. Federal and state laws, however, do not require an automatic evaluation to be initiated in this circumstance. Rather, if a district does not agree that a student requires an evaluation, the district must provide written notice to the parent of the decision not to initiate an evaluation, the basis for that decision, and a copy of procedural safeguards, including the right to request an impartial hearing to contest the decision.

Eligibility Decisions. It is unclear whether multidisciplinary teams include parents when making special education eligibility decisions. Some individuals interviewed by the team reported that psychologists call parents separately to discuss the eligibility determination. Also, it was reported that Program for Students with Exceptionalities (PSE) supervisors are responsible for coordinating the evaluation report and that psychological reports are not generally available for the multidisciplinary team to review. It appears that the psychological reports are not available without request and typically are not available until after the individualized education program (IEP) is written.

Policy and Procedural Manual. The PPS does not have a comprehensive policy and procedure manual, which is necessary to describe the manner in which staff members will implement federal and state legal requirements. Instead, the PPS relies on state regulations and guidelines on various subjects to inform staff about the district's local procedures.

Recommendations

- 1. Formalize, revise, and edit district criteria and benchmarks for eligibility and establish benchmarks for referrals throughout the PPS.
- 2. Develop reports that are readily available and user-friendly to identify schools with referral and eligibility data (overall, MR, ED, LD, and S/L) that exceed benchmarks established by the PPS. Collect information (e.g., individuals initiating the referral, reason for the referral, basis for eligibility) to facilitate analysis among schools that depart from the norm. Identify schools with disproportionately high referral and eligibility rates and monitor a sample of files to ensure that all PPS criteria and procedures are being followed.
- 3. Develop a policy and procedural manual by June 2010 that includes all relevant information needed to identify, evaluate, educate, and provide procedural safeguards to students with disabilities. The manual should incorporate federal and state requirements and indicate how they will be implemented within the PPS. Further, the manual should be user-friendly, communicated widely, be available on the district's Web site, and serve as the basis for comprehensive training for all individuals responsible for and involved in the education of students receiving special education services. Differentiate professional development and written materials depending on the audience, e.g., parents, principals, general education teachers, special educators, etc. The School District of Philadelphia's comprehensive manual is available on its Web site and may provide a template for adaptation; the district provided an electronic copy to the PPS' Program for Student with Exceptionalities.

B. Performance and Instruction of Students Receiving Special Education Services

Positive Findings

• Meeting Adequate Yearly Progress (AYP)

The PPS is one of the few urban school districts in the nation to meet AYP for the 2008-2009 school year. In Pennsylvania, achieving AYP means that a district met all of its targets for high school graduation/attendance rates, test participation, and academic performance. To meet the targets for academic performance, a district must have at least 63 percent of its students score proficient or advanced in reading (compared with 54 percent in 2007) and at least 56 percent scoring proficient or advanced in math (compared with 45 percent in 2007) on the Pennsylvania System of School Assessment (PSSA) exams. All students and all student subgroups must meet these targets in at least one grade band. Grade bands refer to grades 3-5, 6-8 and 11. The PPS met this standard by meeting the 3-5 grade-band targets. Students with disabilities met the standard using the "safe harbor with confidence" calculation. As a result, the PPS' *No Child Left Behind* status improved from Corrective Action II to Making Progress. The district's strong performance provides a solid foundation upon which to improve the achievement of all students.

• Graduation Rates

The PPS graduation rate for students receiving special education services increased from 90.87 percent (FY 2007) to 98.47 percent (FY 2008), exceeding both the state rate and the special education State Performance Plan (SPP) target. The Pennsylvania Department of Education (PDE) has not yet released graduation data for FY 2009.



Exhibit 6. Graduation Rates (FY 2007 and FY 2008)

• Dropout Rates

In the 2006-2007 school year, a smaller proportion (6.96 percent) of PPS students with disabilities dropped out of school than at the state level (14.7 percent). The PPS' rate was only .31 points higher than the SPP target (6.65 percent). Pennsylvania has not yet reported district dropout data for the 2007-2008 school year; however, its Special Education Data Report indicates that the SPP target increased to 12.75 percent. Therefore, it is likely that the PPS will meet the SPP performance indicator once the data are available. (Exhibit 7 below.)





• Teaching and Learning Teams

Led by school management executive directors, teaching and learning teams include staff members from all education divisions, including special education, and are tailored to the specific needs of each school. These teams use standard protocols to gather information and share observations with each principal and school staff. The teams also review each school's strategic plan to determine whether the school is performing at expected levels and they help to provide support in any area showing insufficient progress.

• Focus on Results

A number of different groups interviewed by the team spoke positively about the district's use of the Focus on Results process in the K-5 cluster. Participants appreciated the focus on data, progress monitoring, and cross-talk between schools on substantive issues, resulting in a dramatic change in school instructional practice and culture.

• Interventions

As will be discussed in more detail in Section D (Response to Intervention), the PPS has invested significant material and human resources on literacy and math interventions that include students receiving special education services. Staff members anticipate that as teachers become more proficient with the interventions and the systems are implemented with higher fidelity, the performance of students with disabilities will improve significantly.

• Co-Teaching

Last school year, the PPS initiated a co-teaching pilot in seven schools, with 25 special education and general education teacher teams. The schools were selected based on principal/teacher-team commitment to inclusive practices as a building-level goal.

• Postsecondary Employment

It was reported that based on a FY 2009 post-school survey, 75 percent of PPS students with disabilities are engaged in postsecondary employment and/or education, surpassing the state's target of 66.1 percent.

Areas of Concern

• Participation in Statewide Assessments

In FY 2009, 95 percent or more of students with disabilities (SwDs) participated in statewide assessments at all grade levels, except at 11th grade for both reading (93.8 percent) and math (94.4 percent). This was the only subgroup that did not meet the required 95 percent participation target. However, the participation was higher than the overall rates of 88.26 percent in FY 2007 and 90.2 percent in FY 2008.

• Reading

As with many other school districts across the country, the percentage of students with disabilities scoring at or above proficiency on statewide assessments is significantly below that of other students. Although this subgroup met AYP through "safe harbor with confidence" in grades 3-5, the proficiency rate was relatively low (26.2 percent). This percentage improved by 6.9 points over the previous year. Students scored lower at the middle school level (18.4 percent) and 11th grade (13.2 percent), and the scores decreased somewhat from the prior school year.

Grade Bands	% At/Above Proficiency	Over/Under Prior Year	Results		
Grades 3-5		·			
All Students	56.5	2.7	GM^6		
SwDs	26.1	6.9	SHC ⁷		
Grades 6-8					
All Students	56.7	1.1	GM		
SwDs	18.4	-1.0	Х		
Grade 11					
All Students	50.1	-0.6	Х		
SwDs	13.2	-0.4	Х		

Exhibit 8. Reading Performance of Students with Disabilities and All Students

⁷ SHC: Group met target using Safe Harbor with Confidence Level

⁶ GM: Group met target using Growth Model

• Math

More students with disabilities scored at or above proficiency in math: 36.9 percent (grades 3-5) and 21.3 percent (grades 6-8). These scores were higher than those from the prior school year. As in reading, 11th-graders had the lowest scores.

Grade Bands	% At/Above Proficiency	Over/Under Prior Year	Results		
Grades 3-5		-			
All Students	67.8	1.3	\checkmark		
SwDs	36.9	4.8	SHC		
Grades 6-8					
All Students	59.5	2.2			
SwDs	21.3	1.0	Х		
Grade11					
All Students	43.1	-9.4	Х		
SwDs	8.9	-3.3	Х		

Exhibit 9. Math Performance of Students with Disabilities and All Students

• Access to Core Curriculum

Focus-group participants expressed a general concern about students with disabilities' access to the core curriculum for various reasons. Some of these reasons related to inadequate differentiated instruction; compliance with pacing requirements while ensuring that students are learning what has been taught; instruction in self-contained special classes that are generic in nature and not aligned with grade-level standards, etc.

• Scheduling

Focus group participants expressed concerns that students with disabilities commonly have been scheduled last for classes by schools and their individualized education programs (IEPs) have not been taken into consideration. As a result, students have been placed in intervention programs that were not aligned with their needs and have been scheduled into inappropriate general education classes. Participants also expressed concerns about scheduling problems that resulted in insufficient time for general and special educators to co-plan for programming.

Recommendations

4. Ensure through school visits and monitoring by Teaching and Learning staff that all students who have poor reading or math performance or behavior problems and who are in special education receive appropriate research-based interventions that are implemented with fidelity.⁸ Ensure that progress monitoring is implemented for all students receiving these interventions, and that relevant staff members are reviewing the necessary data and making

⁸ Note: Information discussed in Section D, Response to Intervention and Positive Behavior Intervention Support, is pertinent for students with disabilities.

instructional adjustments as needed. Teaching and Learning staff and Program for Students with Exceptionalities (PSE) staff should collaboratively review summaries of monitoring data for students receiving interventions by school to identify those that are showing significant success or little progress. Study and share strategies used by those schools having the most success to support replication. Intervene with those schools demonstrating little success.

- 5. Review the interventions available for students with disabilities in each school and identify schools that do not have sufficient intervention materials. Based on these results, develop a phased-in plan for the purchase of needed materials, training, and support.
- 6. Review the School District of Philadelphia's *Access to the Core* publication and consider adapting it for the PPS' implementation for the 2010-2011 school year. Review current plans for professional development, coaching, and support for schools to provide all students access to the core curriculum.
- 7. Identify schools that are developing schedules for students receiving special education in general education classes in a way that takes their IEP, intervention needs, and teacher coplanning into consideration. With staff from these schools, develop processes that may be replicated in or improved by other schools. Based on these results, develop a strategy for working with schools requiring assistance to facilitate improved scheduling and co-planning next year. Relevant schools should amend their Continuous School Improvement Plans to reflect appropriate strategies.
- 8. Ensure that at least 95 percent of students receiving special education at all grade levels taking statewide assessments participate in those assessments during spring 2010. Hold principals accountable for this requirement.

C. Organizational Structure to Support Special Education Services

Positive Findings

• High Level of Collaboration and Cooperation

Dr. Patricia Gennari has promoted a high level of collaboration and cooperation between the Program for Students with Exceptionalities (PSE) and her colleagues in the short time she has held her position.

• Senior Program Coordinator Highly Regarded

Mary Jane Conley was highly regarded by multiple focus groups, including parents, school and central-office staff, and the Pittsburgh Federation of Teachers (PFT).

• Cooperation and Support to the "Rights to Local Education Task Force"

Parent participants reported that their Rights to Local Education Task Force has been able to accomplish much more this year because of the cooperation they have received from the PSE

and its "change in culture," including effective communications. Through Ms. Conley's and Dr. Gennari's support, the PPS has met state requirements on support of the Task Force.

• PSE Staff Singled Out

Several PSE individuals were singled out as being extremely effective with respect to their support of school staff.

• Generous Support for Transition Services

The district provides schools with a generous amount of support for transition services, including a rehabilitation counselor at each high school, compared with other school systems reviewed by the Council of Great City Schools.

• Additional Behavioral Staff

The school system is adding one PBIS coordinator and 10 behavior specialists to support 30 schools' implementation of Positive Behavior Intervention Support (PBIS).

Areas of Concern

• General and Special Education Operate in Isolation

Although key appointments of Dr. Lane, Dr. Gennari, Dr. Jerri Lippert, and Ms. Conley have promoted more collaboration between general and special education, these two entities have functioned separately historically. This situation has been further exacerbated by the PSE's administrative isolation in a separate building apart from other educational functions. Also, the PSE's isolation has affected its ability to interact effectively with staff in other district offices, such as the Teaching and Learning staff they should be meeting with regularly.

• Senior Program Title Insufficient to Meet Leadership and Responsibilities Required

Because Ms. Conley's position is currently classified as a senior program officer, she is neither seen nor included as a peer with general education executive directors. This positioning diminishes her institutional leadership and ability to collaborate and further separates her administrative work from that of general education. In addition, the senior program officer title does not reflect the breadth and depth of her significant responsibilities.

• Ineffective Organizational Structure of the PSE

The organizational structure of the Program for Students with Exceptionalities (PSE) does not reflect the core functional responsibilities necessary to support schools and their provision of special education and related services. Because these functions are not readily apparent, it may be more difficult for those not familiar with them to easily contact appropriate staff.

• Lack of Productivity and Effectiveness of Special Education Supervisors

One of the most critical functions of the PSE is to support school staff in their delivery of special education and related services. Although there is a generous ratio of special education

supervisors to perform this duty, compared with other districts reviewed by the Council of Great City Schools, the supervisors' effectiveness and productivity are diminished by a number of factors.

 Supervisors are overwhelmed with responsibilities, which are managed in other systems by principals and their staff. In addition to their involvement in initial referral decisions, supervisors manage the initial eligibility and IEP process, a time-consuming job that is described by an experienced and well-regarded supervisor in the following way:

"We are the ones that watch the time lines, meet with the parents prior to obtaining consent, proofread the Evaluation Report for misspellings or inappropriate statements, search RTI (Real Time Information) for test scores and data [not provided by teachers.] Once we check and add to the E[valuation] R[eport] until it is compliant we send it out to the parent with an invitation for the upcoming IEP meeting. We then contact the school to make arrangements for coverage for the meeting, facilitate the actual IEP meeting, make all of the necessary copies once the meeting is done, pass them out to the appropriate team members, and create a file and turn it into the PSE. After closely evaluating my schedule over the last several weeks, this process consumes approximately 60 percent of my work time on a weekly basis while another 10 percent is spent in travel to and from schools. [This leaves] only 30 percent of my workweek to address the instructional and curricular issues that desperately need our attention."

- The supervisors are assigned to schools in a way that is not aligned with the organizational structure of the four assistant superintendents responsible for most principal supervision. This lack of alignment has the following results:
 - Four supervisors are assigned to schools with students from kindergarten to 12th grade,
 - Some supervisors have schools with several different assistant superintendents. As a result, the supervisors have conflicting priorities and the assistant superintendents are unable to include supervisors consistently in their school walk-throughs and planning/strategy sessions. In addition, this misalignment makes it difficult for each assistant superintendent and superintendent to work together to address school-based issues in a proactive manner or to uncover these issues through principal evaluations.
- The absence of a comprehensive policy and procedural manual that describes the PPS' interpretation of and local standards for implementing state special education regulations and policies has contributed to a reported inconsistent communication between supervisors and school-based staff.

• Lack of Connection Between Behavioral PSE Staff and PBIS Implementers

PSE staff members who are involved in providing support to schools on behavioral issues are disconnected from those staff members implementing Positive Behavior Intervention Support (PBIS). As a result, district efforts to support this research-based activity are not coordinated for maximum effectiveness.

• Centrally Based Data Collection and Files

The district expends a significant amount of time and resources entering school-based data and maintaining special education files centrally. In other urban school districts, this function is performed at the school level.

• Poor Use of Central Clerk

A central clerk is used to type psychological reports. In other districts, the school psychologist performs this function or the report is handwritten if (s)he cannot type.

• Progress Monitoring in Isolation

The PSE employs an individual to address progress-monitoring only for students with disabilities. Therefore, student results are not analyzed on a systemwide basis.

• Lack of Significant Relationship Between Rehabilitation Counselors and General Education Counselors

There is no apparent institutionalized relationship between the rehabilitation counselors, who provide support for students receiving special education, the general education counselors, and PSE staff members who support transition. The rehabilitation counselors have the same role as general education counselors, but they are also responsible for providing transition planning for age-appropriate students with disabilities.

• Disparity with Teachers on Special Assignment

Currently, a number of teachers on special assignment function as administrators. As a result, they are compensated at a higher level (based on additional summer pay) than their administrative counterparts. Although this disparity does not appear to impact functionality, it does have substantial fiscal implications.

• Negative Impact of Separation of Early Intervention on the Program for Students with Exceptionalities (PSE)

The Council's team received information at the end of its visit that early intervention (EI) services for children with disabilities (birth through preschool) are administered within the early childhood unit of the Department of Curriculum, Instruction and Professional Development, which is supervised by Dr. Lippert. Although the Office of Child Development and Early Learning in the Pennsylvania Department of Education (PDE) recommended this structure, EI's separation from the PSE has resulted in very little coordination of special education services, as well as in needless bureaucracy.

As a result, it appears that transition activities, program coordination, and knowledge of children are affected negatively. Further, because of the Individuals with Disabilities Education Act preschool funding for this unit, the PSE has been notified by the state education department that the unit cannot be involved in the evaluation process for those children transitioning to school-aged programs. This funding issue and its current resolution significantly affect the work of PSE staff that have been required to take over this function.

• Staffing Ratios

Information obtained through a survey conducted by the Urban Special Education Leadership Collaborative in FY 2006 (and supplemented by data from other special education reviews conducted by the collaborative and the Council of Great City Schools) was used to compare the PPS' staff/student ratios in four areas to those of 35 school districts responding to the survey.⁹ Although the survey data are not current, they are the best available to compare staffing ratios across urban school districts.¹⁰

The exhibit below reflects the smallest and largest staff/student ratios reported by the districts in the following areas: special educators, paraprofessionals, speech/language pathologists, and psychologists. The PPS' ratio is shown in bold text. The exhibit also includes the number and percentage of districts having ratios that are larger than that of the PPS. For example, the smallest psychology-to-students with disabilities ratio was 1 to 90 and the largest was 1 to 714. The PPS' ratio is 1 to 319. Three of the districts (3 percent) reported a larger ratio than that of the PPS.

Exhibit 10. Comparison of PPS Staff/Student Ratios with Other Urban School Districts

	Special Educator		Para- professional		Speech/ Language			Psychol- ogist			
	SwD	All		SwD	All		SwD	All		SwD	All
	7	55		9	54		45	253		90	520
		78									
					110			706			
	14						127				
				20							1749
	30	422		100	594		714	6073		319 714	4150
% with Larger Ratios	35%	71%		23%	53%		29%	41%		3%	21%
No. with Larger Ratios	12	24		8	18		10	41		3	21

⁹ Note that all school districts did not provide data for every category surveyed: special educators, paraprofessionals, speech/language pathologists, psychologists, social workers, nurses, occupational therapists, and physical therapists. ¹⁰ Note that caution must be used when interpreting data from the survey because school districts may have used different rules when determining their staffing numbers, e.g., including contractual staff, part-time staff, etc. Also, school districts that place a larger proportion of students in private schools may appear to have larger ratios (e.g., special educators) because staff members employed by private schools are not included in the district count. However, the staffing data provides a rough picture about the PPS' standing in this area.

Other urban school districts have a smaller staff/student ratio, on average, than the PPS in most areas. Exceptions are seen with staff-compared-to-all students in the areas of special educators (78 percent with larger ratios) and paraprofessionals (53 percent with larger ratios). Note that districts with larger special education incidence rates tend to have smaller ratios when staff members are compared to total enrollment. The PPS' largest ratios are in the area of psychologists when compared to students with disabilities and all students. See Appendix A for more detailed information.

Recommendations

- 9. Recognize Ms. Conley's leadership position by reclassifying her as an Executive Director.
- 10. As soon as possible, draft a PPS comprehensive policy and procedural manual for the administration of special education and related services that reflects the PPS' interpretation of and local standards for the implementation of relevant state regulations and policies. Once the draft is finalized, develop and implement systemic and differentiated professional development activities to ensure that all relevant central-office and school-based staff have the information they need to support the provision of special education and related services. The PSE should refer to the manual produced by the School District of Philadelphia's (SDP's) Office of Specialized Services Instruction and Support as it develops a Pittsburgh version. The SDP provided the PSE with an electronic version of the manual.
- 11. Eliminate the current PSE organizational structure and create a new one that reflects functions and the accountability systems necessary to support student performance. Once the organizational structure is established and new job descriptions reflecting changes in functions and reporting are completed, open and widely advertise all positions reporting to Ms. Conley. This process should require all individuals reporting to Ms. Conley to apply for the new positions.
- 12. Establish three functional units under the Executive Director (see Appendix B), as follows:
 - a. A senior program officer for *Service Delivery* responsible for the development of researchbased services and supports in the following areas:
 - 1) Teaching and Learning support: establish eight special education administrative positions; assign two positions to the four assistant superintendents for his/her general education schools. In addition to compliance oversight (not implementation), include the following elements that focus on teaching and learning in the special education administrator roles and responsibilities:
 - a) Conduct professional development, technical assistance, and coaching to teachers on research-based practices, including differentiated instruction, co-teaching, provision of interventions, etc.
 - b) Collaborate with school coaches, intervention specialists, and teachers to analyze student data and historical trends and plan strategies for improved performance
 - c) Strengthen the fidelity of progress monitoring and analysis to improve tiered academic and behavioral interventions and supports

d) Provide input for curriculum supervisors in such areas as curricular differentiation, grading, pacing, materials, testing modifications, etc.

Two actions are required to enable administrators to focus on the above activities:

- Transfer from special education supervisors to principals the local education agency (LEA) responsibility for directing and ensuring the provision of appropriate services to students with disabilities in the least restrictive environment. To accomplish this goal, the Strategic Support Team recommends that each assistant superintendent meet with his/her principals and other stakeholders to identify a knowledgeable school-based person or persons to carry out this role and describe the training needed to do so. The PSE may wish to include the Pittsburgh Federation of Teachers in this strategizing process. Based on input from these individuals, Dr. Gennari and Ms. Conley will have the information necessary to develop guidelines for the identification of appropriate school-based staff members, describe their relevant roles and responsibilities, and develop/implement professional development for identified staff. (The School District of Philadelphia's description of roles and responsibilities for this special education administrative position has been provided to the PSE for consideration.)
- To accomplish this action successfully, principals must be accountable for implementing required special education policies, procedures, and practices. Accordingly, local school responsibilities must be identified, communicated broadly, and supported through professional development. Additional information about this issue is discussed in Section G, Accountability.
- 2) Individuals with expertise in each of the following areas of responsibility:
 - a. Inclusion support
 - b. Autism support
 - c. Life skills and multiple disabilities
 - d. Out-of-district support
 - e. Transition services (Coordinate with special education high school administrators, specialists, three center school principals, and rehabilitation counselors)

House the following functions in the Curriculum and Instruction department to enable staff to work closely with that team, but continue direct reporting to the senior program officer for service delivery

- Five curriculum writers
- One reading specialist/coach
- One Wilson Reading support trainer
- b. A program officer for *Related Services* in the following areas:
 - 1) Speech/language, vision and hearing
 - 2) Assistive technology
 - 3) Psychological services

- 4) Behavioral support (ensure coordination with individuals involved with PBIS)
- 5) Interagency coordination
- 6) Assistive technology support
- c. A program specialist for Fiscal and Data Operations in the following areas:
 - 1) Fiscal support
 - 2) Data input (until Encore is operational and dual entry ceases)
- 13. Ensure that all individuals involved with transition activities coordinate with each other and other PSE and school-based counseling staff. Reduce the transition positions by one but ensure that these or other PSE/school-based staff members are able to cover all essential functions.
- 14. As soon as the new electronic IEP system (Encore) is implemented sufficiently, eliminate positions that enter data into Encore and the current special education data system, and eliminate any centralized filing of records, except for students placed outside of the district.
- 15. Eliminate the position with responsibility for typing psychological reports.
- 16. Consider whether it is feasible for individuals within the PPS who are responsible for progress monitoring to be responsible for collecting and analyzing data for students with disabilities, including Aimsweb, READ 180 data, or any other data collected through the PSE. Ensure that appropriate PSE staff members are involved in discussions about the data analysis and its implications for students with disabilities.
- 17. As soon as possible, transfer functions related to early intervention services for students with disabilities to the PSE in order to better streamline and coordinate administrative functions. Continue strong collaboration between Early Intervention (EI) and Early Childhood staff through indirect reporting and frequent meetings. Discuss with staff in the Pennsylvania Department of Education's Office of Child Development and Early Learning the rationale for transferring back EI services to the PSE and the Council team's recommendation.
- 18. Immediately determine if relevant positions supported by IDEA-preschool funding can be switched with other IDEA-preschool eligible activities funded by state/local funds so that EI staff can continue to be involved in conducting evaluations and facilitating meetings for students transitioning to school-aged programs.
- 19. Post all administrative assignments as administrative positions. Appendix B includes an organizational chart of the current PSE organization, a draft of a proposed new organizational structure, and a chart that illustrates the differences. The proposed draft is based on the team's collective knowledge of how effective special education organizations are designed to maximize school-based instruction and services. However, we strongly recommend that Dr. Gennari and Ms. Conley be given the flexibility to modify the proposal based on additional information about school demographics and needs.
- 20. Once the PSE's organization is finalized, prepare and widely disseminate user-friendly documents that describe the new organization and functions, and individuals who may be contacted for assistance.

21. Review the district's staffing ratios compared with other urban school districts and the extent to which the PPS' ratios require adjustment. Although it may be difficult to decrease staff ratios immediately, consider interim steps and possible longer-term accommodations.

D. Response to Intervention and Positive Behavior Intervention Support

Background

Generally, a relatively small number of students have disabilities that are obvious, such as blindness or deafness; most students have disabilities that are not obvious and are based on subjective interpretation. Medical personnel usually identify obvious disabilities before a child enrolls in school. School personnel almost always identify students with more judgmental disabilities after academic or behavioral problems become evident. These disabilities include learning disabilities (LD), mild intellectual disabilities, emotional disabilities, and other health impairments based on attention deficit hyperactivity disorder.

Nationally, the number of students identified as LD increased 22 percentage points over the past 25 years. The largest increase (44 percent) has been among youth ages 12-17. However, evidence shows that the rise in the identification of students with LD or other disabilities has not led to improvements in reading ability, particularly among students ages nine and above. Traditional approaches to reading instruction in the early grades have substantially underestimated the variability among children in their preparation for learning to read. Data suggest that many of these youngsters have difficulties reading, not because of a disability but because they are behind and did not receive the home and/or classroom instruction and supports necessary for foundational language and early reading skills. Students having difficulty reading often exhibit challenging behavior as well.

In practice, it can be difficult to distinguish internal child traits that require the ongoing support of special education from an inadequate opportunity or support for learning and behavior. If children with poor reading performance receive effective instruction that is early and intensive, they can often make large gains in general academic achievement. Research shows that reading failure rates as high as 38-40 percent were reduced to six percent or less by providing proper early intervention. At that point, special education resources could be deployed intensively to the six percent of struggling readers who did not respond successfully. Without early identification and effective intervention, students with LD as well as others with reading difficulties need longterm, intensive, and expensive special education services, which often show meager results. Similarly, staff can successfully reduce behavioral disruptions through the use of Positive Behavior Intervention Support (PBIS).

For academic and behavioral interventions to have the desired effect, they need to be implemented with increasing levels of intensity (three tiers), implemented with fidelity, and be accompanied by progress monitoring (preferably curriculum-based assessment), which is conducted regularly (e.g., every two weeks) and reviewed to adjust the interventions accordingly. This model not only reduces the need for special education, but also reduces racial/ethnic discrepancies.¹¹

In addition, it is critical that teachers effectively differentiate instruction, preferably using universal design,¹² so that students who are unable to read grade-level text continue to access the core curriculum appropriate for their grade level. This process requires teachers to use other instructional modalities, (e.g., text-to-aural technology, text content written at various levels of difficulty, etc.) to present relevant information.

Literacy and Math

Positive Findings

Systemwide RtI Process

The PPS introduced Response to Intervention (RtI) during its 2008 Summer Leadership Institute, focusing on reading in kindergarten through third grade. No formal requirements were placed on the schools for the first year of implementation. This school year, all schools were required to use the RtI process in all grades and implement a 30-minute intervention/enrichment period. The general education unit has led this effort in coordination with all other service areas, such as special education, Title I, English language learners, and migrant education. General and special educators collaborated to support this effort through their development of an RtI handbook.

Systemic Framework

Key to this effort has been the PPS' development of a written RtI framework for reading and math for K-5, 6-8, and high school grade levels. The framework identifies universal screening tools, various interventions at three tiers of intensity, the amount of time expected for the interventions by tier, and progress monitoring tools with expected frequency. The Curriculum and Instruction department has developed a decision tree to help teachers analyze universal screening data and other diagnostic testing to form appropriate homogenous intervention groups for students.

Universal Language

The PPS quickly facilitated the acceptance among staff of a universal language to refer to and describe the RtI process and the district's instructional framework. Focus group members interviewed by the team consistently articulated the PPS' process, including the use of increasingly intensive tiers of intervention, various intervention programs, and progress monitoring data to adjust instruction.

¹¹ Statement by Dr. Reid Lyon before the House Committee on Education and the Workforce Subcommittee on Education Reform (2002) at hhs.gov/asl/testify/t020606a.html; Technical Assistance Center on Positive Behavior Intervention Support at http://www.pbis.org/apbs2008.html; National Center on Student Progress Monitoring at http://www.studentprogress.org/; Minority Students in Special and Gifted Education (2001) at

http://books.nap.edu/openbook.php?record_id=10128&page=15

¹² Universal design is a framework for applying instructional materials, curricula, and educational activities in a way that they are achievable and challenging for students with a wide range of abilities and needs. For more information, see the Center for Applied Special Technology at http://www.cast.org/.

• New Excitement for Learning

Several individuals interviewed by the team shared anecdotes about struggling readers of various ages who were excited for the first time about learning. Interviewees also reported reduced tardiness and increased attendance among these students. These anecdotes suggest that the PPS' RtI efforts are beginning to show promise and that students and staff members are beginning to see meaningful results.

• 30-Minute Intervention/Enrichment Session

Participants interviewed by the team cited the personal attention being provided to students through the 30-minute intervention/enrichment session and how all available school staff are involved in its implementation, including principals, vice principals, paraprofessionals, librarians, physical education teachers, etc.

• Instructional Schedules for Tiers 2 and 3

The PPS developed a useful document to help leadership teams identify appropriate thirdthrough fifth-grade teachers to deliver intervention instruction and to show how student schedules might be arranged to facilitate instruction. The document includes a series of questions designed to produce useful information to problem-solve these issues. Also, the document offers several options for scheduling language arts and social studies. Finally, it provides information about ways in which special and general educators might collaborate to provide interventions.

• Pittsburgh Federation of Teachers (PFT)

After meetings with the PPS and PFT representatives and members, the union supports the RtI initiative but has concerns about how teachers are supported in implementing the initiative and their access to planning time. The union expressed a willingness to work collaboratively with the PPS on these issues.

Area of Concerns

• Fidelity of Implementation

It is not surprising for a systemic process still in its infancy that schools are in varying phases of RtI implementation and that some participants raised concerns about its fidelity, including the following issues:

- The number of students in intervention groups exceeding research-based parameters
- The number of students requiring intervention exceeding available human resources; scheduling issues; progress monitoring difficulties
- Staff support
- The need for instructional coaches to receive additional professional development on appropriate supports for students with disabilities.

• Inclusion of Students with Disabilities

Focus group participants interviewed by the team reported some cases in which reading intervention classes exceeded capacity and, as a result, students with disabilities were removed. As a result, these students lacked access to necessary interventions.

• Wilson Reading and READ 180

Participants cited the value of the Wilson Reading intervention for students with very low reading levels who are showing significantly improved reading performance for the first time. Although this intervention is listed in the district's framework as a Tier 3 intervention, there is a perception among staff that it is neither required nor available for students without IEPs even though it might be beneficial. Further, concern was expressed that the PPS does not pay for teachers to attend training necessary for Wilson certification, which is needed to implement the intervention. This situation is especially troubling given concerns that the district's capacity to implement Wilson Reading is not sufficient to include all students who would benefit from the program. Further, concerns were expressed that READ 180, another intervention program, is not available at the system's Accelerated Learning Academies (ALAs). Available information does not indicate whether alternative effective interventions are present.

• Educational Assistance Program (EAP)

Students in the after-school EAP program use a combination of intervention materials. However, if a student's performance in grades 3, 4, or 5 is not improving and the student has been identified as needing more intense interventions, Corrective Reading (Tier 2) or Sonday (Tier 3) is encouraged but not required. This circumstance raises the question of what EAP would provide students who require more intensive interventions to improve their reading performance.

• Effective Use of Interventionists

Participants also expressed a need for assistance in utilizing interventionist specialists most effectively, given their part-time schedule and conflicting training requirements.

• Progress Monitoring

Only students with disabilities have progress monitoring data that are collected and analyzed through an electronic process, i.e., the Aimsweb system. However, data reports provided to the Council's team only reflected the number of teachers using the system in a timely manner and contained no data on student progress.¹³ Other participants reported using a paper-pencil system to record Dynamic Indicators of Basic Early Literacy Skills (DIBELS) data for progress monitoring, which participants cited as cumbersome and negatively affecting data analysis and management. Some reported that principals unevenly support the process. High school participants indicated that they see an improvement in student performance in content classes, but have not seen data to demonstrate actual improvement.

¹³ Note: progress data is a feature of the Aimsweb system and may be readily available to teachers but was not included in the data provided to the Council team.

• Accountability

Another major issue confronting the PPS is a perceived lack of accountability for implementing RtI with fidelity when professional development has been provided and sufficient material and human resources are available. Apparently, struggling students are viewed too frequently as a "special education" issue only. This issue and related recommendations are discussed in more detail at Section G, accountability.

Behavior

Positive Findings

• PBIS Implementation

In 2007-2008, the PPS launched its Positive Behavior Intervention Support (PBIS) initiative. Currently, this program operates in approximately 30 (of about 48) K-8, K-5, and 6-8 schools. The Office of Student Support Services and the Watson Institute collaborate to provide professional development; and 10-15 behavioral support specialists carry out the initiative in the targeted schools. In addition, the PPS provides professional development in cultural competency.

• Positive Awareness

Participants consistently acknowledged the value of PBIS and its usefulness if implemented with fidelity.

• Progress Monitoring

For each school participating in the PBIS initiative, there is a rich database of information related to the number and reduction of office referrals, disciplinary incidents, and suspensions and expulsions. Outcome data from this initiative is available from the Watson Institute *via* the district's Office of Student Support Services.¹⁴

Areas of Concern

• Westat Evaluation of the Impact of PBIS

In a comprehensive report dated August 2009, Westat found that PBIS had a positive impact on school climate, but the research firm also found that school practices failed to reduce the overrepresentation of African American students in discipline referrals or reduce bullying incidents. Westat cautioned that the schools are still in early stages of implementation and that data from one year may not be a reliable indicator of progress.

• High Rates of Suspending Students One to Three Days.

One focus group participant indicated that a failure to meet student academic needs and rigorous district standards may end up triggering disciplinary behavior resulting in higher suspension rates. There may be reason to believe that this observation is correct, because the

¹⁴ However, data reports were not provided to the Council team, so outcome evidence was not available for review.

district's September 2009 suspension and expulsion report shows a high rate of short-term suspensions beginning at the middle school level and escalating in high school. Surprisingly, 60 percent of kindergarteners were suspended one to three days last year. And African American kindergarteners were five times more likely than were white students to receive such a suspension.



Exhibit 11. Percentage of Students by Grade Suspended 1-3 Days

Furthermore, school data show that some schools have even higher rates of suspension. Some elementary schools reported 50 to 52 percent of students suspended for between one and three days; some middle schools reported 67 and 69 percent suspended; and one high school reported as many as 76 percent of its students suspended one to three days.

• Racial Disparity

As illustrated in the exhibit below, African American (AA) students were much more likely than were white students to be suspended four to 10 days last school year. The disparity was greatest in eighth grade where African American students were six times more likely than were white students to receive this action. The report did not contain information that showed comparable suspension data for students with IEPs.



Exhibit 12. Risk Ratio of African American to White Students Suspended 4-10 Days

• Fidelity of Implementation

As with the implementation of RtI, participants raised concerns about the fidelity of PBIS implementation and the extent to which non-pilot schools were actually utilizing a model appropriately to promote positive student behavior. Focus group participants indicated that

schools with PBIS have not been sufficiently monitored and, as a result, implementation and performance is uneven. This year's process for implementing the program requires an 80 percent vote of support by the faculty, expressed support from the school-based leadership team, and a signed commitment form. Reportedly, progress is now being better monitored and concerns are addressed with principals and their assistant superintendent.

• Impact on Special Education

Concern was expressed that schools were using special education referrals to address behavioral issues rather than providing interventions and support to promote and reinforce positive behavior and reduce negative and aggressive behavior.

• Student Assistance Program

School Assistance Program (SAP) teams—which include counselors, social workers, principals, and teachers—work with community-service providers to address students' social/emotional issues. Focus group participants reported that the process was implemented effectively in about 40 percent of the district's schools. There was also a perception that SAP teams were not connected to the PBIS process, although the teams' services and process are consistent with PBIS' Tier 3 model.

• Accountability

As discussed above, focus group participants reported that PBIS' implementation would improve with increased accountability for its use.

Recommendations

- 22. Identify—in collaboration with appropriate stakeholders—the key performance measures that would show whether the PPS' RtI model is implemented with fidelity, e.g., universal screening is analyzed to identify student needs for interventions at various tiers; identified tiered interventions are implemented with fidelity; progress monitoring is conducted at expected intervals; and monitoring data are analyzed and used to adjust instruction. These measures should be used to drive professional development; monitored during Teaching and Learning visits; and inform the Pittsburgh Urban Leadership System for Excellence (PULSE) principal evaluation and the Research Based Inclusive System (RISE) of [teacher] evaluation processes.
- 23. Convene a group of people from schools having the most difficulty implementing RtI to identify issues that appear to be most challenging. Involve effective intervention specialists and experts in the field, as well as knowledgeable individuals from schools having greater success implementing RtI to identify strategies most likely to be beneficial. In addition, identify the strategies used by interventionist specialists and schools to interact most efficiently and effectively. Include these strategies in the PPS' RtI training. If any issues are beyond the capacity or resources of the school, the central office should follow up as appropriate.

- 24. Take steps to determine the extent to which any students with IEPs are denied access to appropriate research-based interventions when classes are full. If this is a systemic issue, take steps immediately to eliminate the problem.
- 25. Identify the core knowledge instructional coaches need to provide support to teachers involved with educating students with IEPs. Include this information in professional development activities and provide coaches with back-up support when they require assistance.
- 26. Investigate ways to expand Wilson Reading so that all students who need this or other comparably effective interventions will receive them. Identify the number of teachers that the PPS requires to be certified as Wilson Reading instructors and provide selected teachers with the financial support to become certified. Also, determine whether the PPS itself might be able to train and Wilson-certify teachers.
- 27. Review the interventions available at Accelerated Learning Academy (ALA) schools to ensure they have sufficient resources and training to implement RtI, including the provision of Tier 2 and 3 interventions that students require.
- 28. Target schools with disproportionately high rates of suspensions and monitor their use of PBIS, including the collection and review of office-referral data; and monitor implementation of the program, using the Schoolwide Evaluation Tool (SET). Include the results in the PULSE evaluation process. See Section G, Accountability Framework, for additional information related to this issue.
- 29. Report and analyze data on students with IEPs who are suspended using the same format as the suspension and expulsion report. Include in the analysis a risk ratio comparing students with and without IEPs who are suspended and expelled. Use the data to target schools with disproportionate results and include them in the activities referred to in Recommendation 28.
- 30. Utilize SET to analyze the extent to which each PBIS school is meeting the 80 percent benchmark target for faithful implementation of the program. Incorporate these results in PULSE principal evaluations. For non-pilot PBIS schools, require the use of PBIS or another model that is designed to promote positive student behavior and utilize a tool comparable to SET to measure fidelity of implementation and its results.
- 31. Review the Student Assistance Program (SAP) process and determine the extent to which it is integrated with PBIS. Based on this review, take appropriate steps to ensure this integration by drafting relevant written information and initiating professional development as needed.
- 32. Consider whether the PPS has the fiscal resources to purchase or develop a Web-based electronic system that would support RtI and PBIS integration with each other and other district databases. Such a system should support the identification of students requiring various tiers of intervention; document student needs; help identify appropriate interventions; collect and post progress monitoring data or import it from another electronic source; initiate user-friendly reports on student progress; and be used to document follow-up action. Such an electronic system might also support data that could be used to compare the effects of various

interventions on student achievement and behavior, adjusted for student demographics and program implementation rates. Also, the system might facilitate analysis of student progress by school, grade, subgroup, etc.

E. Educating Students in the Least Restrictive Environment

Background

• State Performance Plan

Each state is required by the Individuals with Disabilities Education Act (IDEA) to develop annual targets for the placement of students with disabilities into three educational settings: regular class for 80 percent or more of the time; regular class for less than 40 percent of the time; and other settings outside of a regular school attended solely by students with disabilities. Although states are required to monitor district progress toward meeting established targets, state educational agencies are not required to include this area as a compliance indicator when determining whether a school district has met IDEA requirements. Pennsylvania has chosen to consider educational placement as a performance measure rather than as a compliance indicator.

• Placement in Regular Classes 80 Percent or More of the Time

Last school year, 42.9 percent of PPS students were educated in regular classes for 80 percent or more of the time; and the district did not meet the state's target of 57.1 percent. The district's percentage (45.1) was higher in FY 2007.



Exhibit 13. Regular Class 80 Percent or More of the Time (FY 2007-2009)

• Placement in Regular Classes Less than 40 Percent of the Time

In Pennsylvania, this placement category is commonly referred to as "full-time special education classes." Last school year, 10.4 percent of PPS students were educated in full-time special education classes, narrowly missing the state target of 10.2 percent. The district's percentage in this category increased significantly over FY 2007.



Exhibit 14. In Regular Class Less Than 40 Percent of the Time (FY 2007-2009)

• Placement in Other Settings

This category is commonly referred to as separate or special schools/centers. Last school year, 12.9 percent of PPS students were educated in separate schools. This percentage is significantly higher than the state target of 3.7 percent. The district's percentage of students placed in this setting has not changed significantly since FY 2007. See Exhibit 15.



Exhibit 15. In Other Settings (Outside of a Regular School)
Positive Findings

• Commitment to Inclusive Education

A prior school board member reported that in 2000, the PPS was perceived as being one of the least inclusive school districts in the nation, but this image has changed significantly as the school system made a commitment to providing more educational opportunities for students with disabilities. One parent shared that her family moved to Pittsburgh to obtain an inclusive education for her child with Down's syndrome. Although the process of obtaining the services was somewhat rocky, the parent expressed satisfaction with her child's school success. Assistant superintendents, central-office administrators, principals, teachers, and parents consistently acknowledged the district's commitment to inclusive settings and expressed their strong belief that instruction in general education classes, with appropriate supports for students and teachers, is necessary to significantly improve academic performance.

• State Target for Separate Class Instruction

As discussed above, the PPS has almost reached the state's target for educating students in full-time classes (-.20 percentage points). Although the state target is lower this school year (9.1 percent), PSE representatives indicate that fewer students are being educated in this setting now.

• Successful Strategies & Support

Focus group participants cited the PPS' expansion of co-teaching, instructional coaching, common-planning time, more effective paraprofessional support and scheduling, and interventionist specialists' technical assistance as positive contributors to the district's inclusive education practices.

• Reducing Reliance on Placements Outside of the PPS

The PPS has taken steps to reduce its placement of students in private schools, especially among students requiring emotional support. This school year, the PSE returned about 24 high school students and placed them on a separate floor at Westinghouse High School, a general education school, with supports and services provided by a combination of contracted services (Holy Family Institute) and district services. An additional 13 students were placed at McNaugher School. The district is also using a portion of its IDEA American Recovery and Reinvestment Act (ARRA) funds to support the return to PPS schools of students attending private licensed facilities.

• Professional Development (PD)

To educate effectively more students in the general education classroom, the Program for Students with Exceptionalities (PSE) and the Departments of Assessment and Curriculum and Instruction have collaborated to offer professional development. Within the last few years, teachers have had access to multiple professional development sessions, including those held after school, weekends, and during the summer. Teachers earn credit hours and/or receive workshop rates for attendance. Professional development is also provided at schools

during the week or on designated professional development days throughout the calendar year. School-based reading and math coaches and intervention specialists assigned to individual schools also provide training. Reportedly, joint special/general educator training is more common now than it was previously.

Areas of Concern

Educating Students in General Education

• Sufficient Support

A number of focus group participants expressed concern that not all students with disabilities educated in general education classes are receiving the necessary supports that they need to improve their academic performance. Several issues were raised, such as scheduling the provision of services, insufficient common-planning time for general and special educators, and the availability of appropriate research-based interventions.

• Union Concerns

Representatives of the Pittsburgh Federation of Teachers (PFT) also expressed concern about the extent to which teachers are receiving the support that they need to include students with disabilities in general education classrooms, but they complimented the PSE's leadership and its collaboration with the union. Further, they welcomed a collaborative professional development effort with the PPS to improve current practices.

• Professional Development

Although the PPS has a significant amount of professional development available for teachers, there is a concern that when not mandated, teachers are not accessing the training in sufficient numbers. Further, concerns were raised about teachers not implementing what they have learned in professional development in their classrooms. For example, it was reported that teachers are not implementing information acquired from universal design consultations or workshops. Some people believe that this problem is based on some educators' opinion that universal design is a special education responsibility, rather than a research-based practice for all students. As a result, many teachers prefer to have students removed from general education classrooms rather than providing them with the necessary and reasonable supports to succeed.

• Including Special Education Teachers in Departmental Meetings

There does not appear to be a systemwide practice in schools of including special education teachers in departmental meetings. This practice is essential to ensuring that these teachers have information that they need to provide their students access to the core curriculum.

• Access to IEPs

Some focus group participants expressed concern that all teachers do not have access to Individualized Education Plan (IEP) information necessary to provide students with the accommodations they need.

• Separate Education for Students Who Are Gifted and Have IEPs

A number of issues were raised about the configuration of instruction for students who are gifted and have IEPs.

- Separate Classes.

Several focus group participants shared their concern about the district's use of full-time classes solely for students who are gifted and have IEPs. The participants believe that the PPS has not initiated more inclusive instruction for these students because of parental preference. While parental choice must be considered, it does not mean that the district should not encourage students to be in a least-restrictive-environment.

- Travel to Another School One Day Each Week

Some students who are gifted and have IEPs are bused to another school one day each week to receive "gifted education." As a result, they are not receiving core curriculum on those days or any interventions they may require.

Educating Students in Special Schools

• Not Meeting State Target

As discussed above, last school year the PPS placed 12.9 percent of its students receiving special education services in separate schools, well below the state's target of 3.7 percent and the state's placement target of 4.2 percent. This year the target decreases to 3.3 percent.

• State Monitoring

In October 2009, the Pennsylvania Department of Education (PDE) provided notice that it would be monitoring the PPS, along with 19 other Pennsylvania districts, to determine compliance with the IDEA and its federal class action settlement (*Gaskin*) regarding the placement of students outside of the district. The PPS reports that the state education department expressed special concerns about the disproportionate placement of African American males outside the district.

• Emotional Support in Kindergarten Through Fifth Grade

In addition to emotional support services provided in all schools, several regional PPS classes are available for students in kindergarten through fifth grade. In addition, therapeutic classes are available in nine schools. Some participants expressed concern that PBIS is not being used before students are placed in regional classes. See Section D for more information about PBIS.

• Emotional Support for Middle and High School Students

For students in sixth through eighth grades, therapeutic classes are available in nine of the PPS' 25 middle grade-level schools. Such classes are also available in one of the 11 high school grade-level schools. Various focus group participants expressed concern that there were insufficient emotional support services available at the middle and high school levels;

and, as a result, principals seek to have students requiring such support removed from their schools. Cost was not cited as a barrier for therapeutic classes, which enroll up to 12 students and provide a therapist, teacher, and paraprofessional; but space was cited as a major challenge. Providing high school students with access to meaningful vocational education opportunities was another major challenge.

• McNaugher Education Center

The PPS has one school that provides services only to students requiring emotional support in grades 4-12, but the school has only one room available for secondary school students.

• Westinghouse Program

As discussed above, the Holy Family Institute program was transferred to a separate floor at Westinghouse High School. Because the program is managed by a private agency, Program for Students with Exceptionalities (PSE) staff provides neither technical assistance nor support to these students. Furthermore, the district agreed that there would be no interaction between this special program and general high school students. The assistant superintendent who visits Westinghouse does not "walk though" the emotional support program; instead, Holy Family staff members conduct this activity. Because of their isolated setting, students in this program are considered to be in a separate center for state reporting purpose. It is unclear, however, if the state education department considers this program to be "outside" the district for reporting and monitoring purposes.

• Transitioning Students to Regular Schools

During the 2008-2009 school year, the PSE transitioned 15 students to general education schools and provided them with special education support on either a part-time or full-time basis. The Council's team was informed that the greatest challenge and barrier to returning students to the PPS' general education schools was the degree to which school personnel accepted and supported the movement.

In General

• Enrolling Students Receiving Special Education in Alternative Education Programs

Reportedly, one alternative education program, Community Education Partners (CEP), does not permit students receiving special education services to enroll in the program. As a result, this option is not available to provide emotional or learning supports to eligible students.

• Impact of School Choice on Least Restrictive Environment (LRE)

As is common in urban school districts across the country, one of the negative aspects of choice has been the lack of equitable access to services by students with disabilities. It was reported that the impact of school choice in the PPS is most noticeable at the high school level. At that level, comprehensive high schools—such as Langley, Oliver, Westinghouse, and Peabody— have close to a 30 percent special education enrollment rate. With such high rates, it is more difficult for school staff to teach and support students with disabilities in general education classes.

Recommendations

- 33. As with Response to Intervention (RtI) and Positive Behavior Intervention Support (PBIS), make universal design/differentiated instruction and the effective inclusion of students with disabilities in general education a major PPS initiative, with visible and high-level support from the superintendent's leadership team, in collaboration with the Pittsburgh Federation of Teachers and parent organizations.
- 34. Convene a group of people from schools that are having the greatest challenges educating students with disabilities in general education classes with appropriate supports to determine problems and barriers and to design solutions. Also include people who are knowledgeable about these schools, school representatives, effective intervention specialists, experts in the field, and knowledgeable individuals from schools reported as having a high level of general instructional support for these students.
 - a. Identify issues that appear to be most challenging to the schools.
 - b. Prioritize strategies that would be beneficial to most of the schools and identify the technical assistance and professional development that could be made available to support their implementation.
 - c. Require each school to amend, as appropriate, its Continuous School Improvement Plan to specify the steps it will take to improve its instruction and support for students with disabilities.
 - d. Follow up as appropriate if any issues are beyond the capacity or resources of local schools to handle.
- 35. Identify—with knowledgeable stakeholders—core research-based practices that provide evidence of effective inclusive education, including universal design/differentiated instruction and co-teaching. Review current protocols for Teaching and Learning visits and revise them as necessary to include these practices. Also, embed any practices not already included in current professional development activities.
- 36. Identify schools that are implementing these practices effectively and analyze the performance of students who are co-taught, compared with other students with and without disabilities. If the data provide positive performance gains for co-taught students, take steps to expand the co-teaching model.
- 37. Analyze the risk ratio of African American males placed in schools outside of the PPS, compared with students from other subgroups. Also, identify the number of African American males in these settings by grade and by other data available. Convene a cross-functional group of knowledgeable individuals to review these data and develop a set of hypotheses about conditions contributing to this pattern of placement. Based on these hypotheses, review the recommendations from this report and supplement them to include other relevant strategies. Review the data in September and February next school year and follow-up with revised strategies as needed.

- 38. Develop a report that analyzes the following data districtwide, by school, and grade band; and group schools associated with each assistant superintendent: the percentage of students with disabilities educated in general education classes more than 80 percent of the time; 80 percent to 40 percent; and less than 40 percent.
 - a. Identify targets for these educational settings for the PPS, and for each school based on its current configuration of services. (Note: Some schools have regional or clustered classes that include students placed from other schools.)
 - b. Identify data points that would recognize a school as needing improvement.
 - c. Based on this analysis, require targeted schools to amend, as appropriate, their Continuous School Improvement Plans to identify steps they will take to increase the education of students with disabilities in general education classes. As part of this process, ensure the provision of the technical assistance and professional development necessary for each school to implement its plan.
- 39. Develop a monthly and annual report showing the number and percentage of students each school transfers to another school for special education services by reasons for the transfers. Identify targets for the PPS and each school, and data points that would recognize a school as needing improvement.
- 40. Continue to develop strategies and programs that would permit students with disabilities to attend their home school or school-of-choice with appropriate supports and services. Include cross-functional teams in this process.
- 41. With stakeholders (assistant superintendents, principals, central-office staff, union representatives, parents, etc.), consider ways in which services could be improved in order to meaningfully support students with significant emotional/behavioral needs at the middle and high school levels within the district. As part of this process, consider the recommendations regarding PBIS in Section D. Engage PPS leadership in the review of these recommendations and discussion of steps that would need to be taken to implement those recommendations that are research-based and designed to improve the provision of emotional supports.
- 42. Review the Holy Family Institute program at Westinghouse High School to identify ways in which the students might be allowed to have meaningful interaction with the schools' general education population. Also, include the program as part of the assistant superintendent's Teaching and Learning visits to ensure that the PPS' curricular standards and expectations are being met and expand knowledge about any effective supports that may be useful for other school programs. Ask the Pennsylvania Department of Education whether the Holy Family program is considered to be an "outside the district program."
- 43. Offer to collaborate with the Pittsburgh Federation of Teachers (PFT) in providing professional development related to effective inclusive practices, including universal design/differentiated instruction, and co-teaching. As part of this collaboration, discuss potential strategies for increasing special educator and other teacher participation in professional development activities.

- 44. Take appropriate steps quickly to ensure that all special education teachers have access to grade-level and/or content-area meetings, and include the results of these sessions in general Teaching and Learning visits to schools.
- 45. Develop an "IEP At a Glance" summary sheet with knowledgeable stakeholders that would include the most important IEP-related information for distribution to students' teachers and other staff having a "need to know." Such information often includes any important health data, accommodations, interventions, etc. With electronic IEP systems, identified data fields should be able to migrate into the IEP summary without any additional data input.
- 46. Review the configuration of services for students who are gifted and have IEPs and identify strategies that would enable those currently in full-time special education classes to be educated in regular gifted classes for core curriculum areas with support and differentiated instruction. Also, consider alternatives to the current practice of busing students for gifted services to another school one day a week.
- 47. Contact Community Education Partners (CEP) representatives and discuss how its program could be modified to provide special education and related services. The School District of Philadelphia facilitated this modification; and its CEP alternative school includes students with IEPs.
- 48. Convene representatives of the PPS' leadership team to review data on the enrollment of students receiving special education services in charter schools and magnet programs to consider any inequitable access and negative impact that choice programs may be having on comprehensive high schools with respect to their disability incidence rates. If any issues are identified, convene a task force to develop short- and long-term strategies that may be taken to reduce this negative impact. In addition, identify what additional materials and/or human resources the comprehensive high schools may need to address their disproportionately high special education enrollments.

F. Fiscal Issues

Positive Findings

• Due Process

District data show a low number of due process hearings requested by parents to challenge educational decisions affecting their children. Only two have been filed this school year, both of which are pending. Also, last school year, only three were requested; one was withdrawn and two were settled (one with attorney fees).

• Transportation

According to the Director of Transportation, the district's cost for transporting students with disabilities is not as high as other comparable districts, based on an audit that was completed several years ago. He does not believe results have changed since the audit.

Areas of Concern

• High Per-Pupil Costs

According to information provided by the PPS, last year's per-pupil costs were \$1,000 more than the costs of statewide peers. Also, per-capita spending was \$3,000 more than what a state consultant considered would be adequate. The Council did not separately analyze district expenses to determine whether it was in agreement with this conclusion.

• High Incidence Rate

As discussed previously, the PPS' special education incidence rate is higher than that of most urban districts. As a result, the district employs more special education teachers than 71 percent of urban school districts sampled based on their total student enrollment. (See staffing information discussed in Section C.)

• Holy Family Institute Program

Although the PPS' collaboration with the Holy Family Institute enabled the school system to transfer the program to Westinghouse High School, the contract with the agency did not result in any cost savings.

• Charter Schools

There are seven charter schools in Pittsburgh that educate 272 students identified as needing special education services. It was reported that there were cases in which a charter school, after it has received its proportionate share of IDEA funds, transferred students with disabilities back to the PPS, citing an inability to provide appropriate services. The Council has heard of similar situations in other cities.

• Transportation

Another issue that drives transportation costs relates to the placement of regional classes. Transportation staff members voiced concern that they are included in discussions with the PSE only when a proposed placement is not physically accessible. The education of more students at or near home schools (the school students would attend if not disabled) would reduce transportation costs.

• Contractual Services

The PPS relies heavily on contractual paraprofessionals and bus aides. The Council's team heard contradictory information about the fiscal benefit of contracting out these services.

• Schoolwide Title I Program

It was reported that the PPS has not considered any possible benefits of blending Title I and IDEA funds in schools with schoolwide Title I programs.

• State Financial Support for Approved Private Schools (APS)

A high percentage of students in separate schools are educated outside the district. Four of these outside schools are APS, which receive 60 percent funding from the state and 40 percent from the PPS. State funding is not available to the PPS for any students receiving comparable services within the district. This fiscal situation would seem to have a negative impact on the PPS' development of alternative in-district emotional-support services for students currently in need of an APS. As in most states, this funding mechanism was established years ago before school districts had any capacity to develop intensive services for students with significant educational needs.

Recommendations

- 49. Review the Holy Family Institute program and determine whether the PPS has the capacity to implement those elements that are effective in improving student performance.
- 50. Determine whether any data exist to support the perception that one or more charter schools has released students with disabilities inappropriately and/or that the timing of this release was suspect, based on funding schedules. If such data do exist, determine whether there are steps that the PPS can take under current rules to address this situation or whether additional options are needed. If no such data exist but a perception persists, develop a mechanism for collecting future data for review analysis.
- 51. Consider ways in which the Program for Students with Exceptionalities (PSE) and district transportation staff could collaborate to reduce transportation costs.
- 52. Investigate and analyze whether contractual use of paraprofessionals and bus aides is more costly than using PPS employees. If so, develop and implement a plan to change this practice.
- 53. As a long-range goal, explore strategies that would allow school districts to access the 60 percent funding for in-district programs currently available only for APS students.
- 54. Review the rules for blending Title I and IDEA funds in schools with schoolwide Title I programs and, if eligible, determine whether this funding model would be beneficial. If it is determined that would be the case, follow up with steps necessary to implement the blending at selected schools. The Council can assist the district in this area.

G. Accountability Framework

Positive Findings

• PULSE

Three years into its Excellence for All reform agenda, the PPS initiated in 2007 a comprehensive development program for principals, called the Pittsburgh Urban Leadership System for Excellence (PULSE). The system was designed to recruit, train, support, evaluate, improve, and compensate principals. Funded through a \$7.4 million federal Teacher

Incentive Fund grant, the program acknowledges school leadership as the "heart of the district's Excellence for All reform agenda."¹⁵ Two of PULSE's six components include performance-based evaluations and compensation. Principal evaluations are based on seven performance standards and 27 practice components. A rubric is used to assess performance on four levels. Performance-based compensation, i.e., pay-for-performance, recognizes and rewards the contributions of top performers.

• Gates Grant and RISE

More recently, the PPS was awarded a \$40 million grant from the Bill & Melinda Gates Foundation to Empower Effective Teachers. The plan builds upon current activities to improve student achievement by ensuring that there is a highly effective teacher in every classroom. It identifies three priorities for improving teaching and learning: (a) increase the number of highly effective teachers in the district; (b) increase exposure of high-need students to highly effective teachers; and (c) ensure all teachers work in learning environments that support their ability to be highly effective. The district also will receive additional funding from the foundation to support research over the next two academic years to develop fairer and more accurate measures of effective teaching.

As part of this initiative, the PPS developed the Research Based Inclusive System of Evaluation (RISE), which addresses four areas of research-based teaching: planning and preparation; classroom environment; professional responsibilities; and instruction. This year, RISE is being piloted in schools that volunteered for this opportunity. Next year, it will be implemented districtwide.

• Teaching and Learning Feedback Tools

The PPS has developed a set of metrics for monitoring school progress during school visits and learning walks. Protocols for English Language Arts (ELA) [grades K-2, 3-5, and 6-12] and science were shared with the Council's team. The monitoring process focuses schools on a small number of indicators to measure improvement. The PPS uses these data to generate mid-year and end-of-year progress reports on school improvement. The framework is not used for summative evaluations of teachers. To enhance this effort, the PPS strengthened its Real Time Information (RTI) system to track school and district-level performance on achievement-related initiatives to target activity on schools to maximize student achievement.

• School Plans for Excellence

Schools use a two-year continuous school improvement plan process to analyze and address educational needs and map activities designed to improve student achievement.

• Pittsburgh Promise

The Pittsburgh Promise is a cornerstone of the PPS' efforts to ensure that all students graduate college-ready. With support by the PPS, the scholarship program was created by The Pittsburgh Foundation and funded through the University of Pittsburgh Medical Center,

¹⁵ PPS Web site at http://www.pps.k12.pa.us/14311043013230450/site/default.asp.

foundations, corporations, and individuals in the Pittsburgh community. Last year, 757 graduates (67 percent of eligible students) won Promise scholarships. By tracking recipients attending college, the district hopes to identify important indicators of college readiness and completion. To win a Promise scholarship, a student must graduate from a PPS or public charter high school; be a district student and Pittsburgh resident continuously since ninth grade; earn a GPA of at least 2.5; maintain a minimum 90 percent attendance rate; and be admitted to a Pittsburgh Promise public or private postsecondary school, which includes all Pennsylvania state-funded schools, community colleges, and private schools that offer two-or four-year degree programs, including many trade schools.

Areas of Concern

• PULSE

The Pittsburgh Urban Leadership System for Excellence (PULSE) principal performancebased evaluation system appears to lack components that would address the following: disproportionately high referrals for special education evaluations; placement of students in full-time classes in or outside of the school; suspension of students with IEPs; or faithful implementation of RtI/PBIS, universal design/differentiated instruction, and inclusive special education instruction. In addition, the evaluation system does not appear to take into account students with disabilities' growth in academic performance; timely completion of eligibility decisions and IEPs; and development of appropriate IEPs—including transition planning that are implemented with fidelity.

• RISE/Teaching and Learning Protocol

It is not apparent that Research Based Inclusive System of Evaluation (RISE) or the Teaching and Learning feedback tools include components related to the faithful implementation of RtI/PBIS, universal design/differentiated instruction, and inclusive special education instruction.

• Pittsburgh Promise

It is not clear whether the tracking of Promise recipients and their college success includes information pertaining to students' prior special education status and disability area so that indicators of college readiness and completion can be used to improve the PPS' instruction for this group of students.

• Interim and Unit Assessments

The state's interim and unit assessments used to predict student performance on annual statewide assessments have not been aligned with the Pennsylvania Department of Education's new modified achievement assessment (PSSA-M). As a result, students lack access to a valid assessment tool that will enable their teachers to make appropriate instructional adjustments.

Recommendations

- 55. Review Pittsburgh Urban Leadership System for Excellence (PULSE) to ensure that components include gathering of evidence that pertains to the following:
 - a. Faithful RtI and PBIS implementation
 - b. Faithful universal design/differentiated instruction implementation
 - c. Education of students receiving special education in general education classes for most of the school day with appropriate supports and accommodations. If co-teaching, effective use of method
 - d. Disproportionately high rates of suspensions, referrals for special education services, and placement of students in full-time classes either inside or outside the school
 - e. Growth in academic performance of students with disabilities
 - f. Timely completion of special education eligibility decisions and IEPs
 - g. Development of appropriate IEPs and faithful implementation, including transition services.
- 56. Review RISE to ensure that its components include the gathering of evidence pertaining to the faithful implementation of RtI/PBIS, universal design/differentiated instruction and inclusive special education practices, including co-teaching.
- 57. Review the elements related to the tracking of Pittsburgh Promise recipients and ensure they include disability status to facilitate data analysis and planning for this group of students.
- 58. Join with other districts to approach the Pennsylvania Department of Education regarding its development of interim and unit assessments aligned with PSSA-M.
- 59. See relevant recommendations from other sections pertaining to accountability.

CHAPTER 4. SUMMARY OF RECOMMENDATIONS

Recommendation Matrix

The recommendations from the previous chapter are summarized below and highlight various activities related to implementation. The reader should note that each recommendation often comes with a detailed explanation and suggestions for implementation that are included in the preceding chapter but are not presented here.

AREAS	Recommendations	Meet	Data	Write	ΔA	Communicate	Accountability	Fiscal
Ice	1. Formalize, revise, and edit district criteria and benchmarks for eligibility and establish benchmarks for referrals throughout PPS. (Plan, Write, PD)	\checkmark		\checkmark	\checkmark	\checkmark		
SwD Incidence	2. Develop reports that are readily available and user-friendly to identify schools with referral and eligibility data that exceed benchmarks established by PPS.		\checkmark				\checkmark	
SwI	3. Develop a policy and procedural manual by June 2010 that includes all relevant information needed to identify, evaluate, educate, and provide procedural safeguards to students with disabilities.			\checkmark	\checkmark	\checkmark		
	4. Ensure through school visits and monitoring by Teaching and Learning staff that all students who have poor reading or math performance or behavior problems and who are in special education receive appropriate research-based interventions that are implemented with fidelity.		\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	
nce	5. Review the interventions available for students with disabilities in each school and identify schools that do not have sufficient intervention materials.		\checkmark		\checkmark			\checkmark
Performance	6. Review the School District of Philadelphia's <i>Access to the Core</i> publication and consider adapting it for PPS implementation for the 2010-2011 school year.	\checkmark		\checkmark	\checkmark	\checkmark		
Pe	7. Identify schools that are developing schedules for students receiving special education in general education classes in a way that takes their IEP and intervention needs into consideration.	\checkmark			\checkmark	\checkmark		
	8. Ensure that at least 95 percent of students receiving special education at all grade levels taking statewide assessments participate in those assessments during spring 2010. Hold principals accountable for this requirement.			\checkmark		\checkmark	\checkmark	
zation	9. Recognize Ms. Conley's leadership position by reclassifying her as an Executive Director.							\checkmark
Organization	10. Draft a PPS comprehensive policy and procedural manual for the administration of special education and related services that reflects PPS' interpretation of and local standards for the implementation of relevant state regulations and policies.			\checkmark	\checkmark	\checkmark		

AREAS	Recommendations	Meet	Data	Write	PD	Communicate	Accountability	Fiscal
	11. Eliminate the current PSE organizational structure and create a new one that reflects functions and the accountability systems necessary to support student performance.			\checkmark		\checkmark		
	12. Establish three functional units under the Executive Director (Appendix B).					\checkmark		
	13. Ensure that all individuals involved with transition activities coordinate with each other and other PSE and school-based counseling staff.					\checkmark		
	14. Eliminate positions that enter data in Encore and the current special education data system, and eliminate any centralized filing of records, except for students placed outside of the district.					\checkmark		
(p	15. Eliminate the position with responsibility for typing psychological reports.	\checkmark				\checkmark		
Organization (Continued)	16. Consider whether it is feasible for individuals within PPS responsible for progress monitoring to be responsible for collecting and analyzing data for students with disabilities, including Aimsweb, READ 180 data, or any other data collected through PSE.	V						
rganizat	17. Transfer functions related to EI services for students with disabilities to PSE in order to better streamline and coordinate administrative functions.	\checkmark				\checkmark		
0	18. Determine if relevant positions supported by IDEA-preschool funding can be switched with other IDEA-preschool eligible activities funded by state/local funds so that EI staff can continue to be involved in conducting evaluations and facilitating meetings for students transitioning to school-aged programs.	\checkmark						\checkmark
	19. Post all administrative assignments as administrative positions. Appendix B includes an organizational chart of the current PSE organization, a proposed organizational draft, and a chart that illustrates the differences.	\checkmark				\checkmark		
	20. Prepare and widely communicate user-friendly documents that describe the new organization and functions, and individuals who may be contacted for assistance.			\checkmark		\checkmark		
	21. Review the district's staffing ratios compared with other urban school districts and the extent to which PPS ratios require adjustment.					\checkmark		\checkmark
IS	22. Identify the key performance measures that would show whether PPS' RtI model is implemented with fidelity.	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	
RtI & PBIS	23. Convene individuals from schools having the most difficulty implementing RtI to identify issues that appear to be most challenging.	\checkmark			\checkmark			
ł	24. Take steps to determine the extent to which students with IEPs are denied access to appropriate research-based interventions when classes are full.	\checkmark				\checkmark	\checkmark	

AREAS	Recommendations	Meet	Data	Write	PD	Communicate	Accountability	Fiscal
	25. Identify the core knowledge instructional coaches need to provide support to teachers involved with educating students with IEPs.	\checkmark		\checkmark	\checkmark	\checkmark		
	26. Investigate ways to expand Wilson Reading so that all students who need this or other comparably effective interventions will receive them.	\checkmark						\checkmark
	27. Review the interventions available at ALA schools to ensure they have sufficient resources and training to implement RtI, including the provision of Tier 2 and 3 interventions that students require.	\checkmark			\checkmark			\checkmark
RtI & PBIS	28. Target schools with disproportionately high rates of suspensions and monitor their use of PBIS, including the collection and review of office-referral data, and monitor implementation of the program, using the Schoolwide Evaluation Tool (SET).		\checkmark		\checkmark		\checkmark	
RtI &	29. Report and analyze data on students with IEPs who are suspended using the same format as the Suspension and Expulsion report.		\checkmark				\checkmark	
	30. Utilize SET to analyze the extent to which each PBIS school is meeting the 80 percent benchmark target for faithful implementation of the program. Incorporate these results in PULSE principal evaluations.		\checkmark		\checkmark	\checkmark	\checkmark	
	31. Review the SAP process and determine the extent to which it is integrated with PBIS.	\checkmark		\checkmark	\checkmark			
	32. Consider whether PPS has the fiscal resources to purchase or develop a web-based electronic system that would support RtI and PBIS integration with each other and other district databases.	\checkmark					\checkmark	\checkmark
(E)	33. Make universal design/differentiated instruction and the effective inclusion of students with disabilities in general education a major PPS initiative.	\checkmark			\checkmark	\checkmark	\checkmark	
onment (LRE)	34. Convene a group from schools that are having the greatest challenges educating students with disabilities in general education classes with appropriate supports to determine problems and barriers and to design solutions.	\checkmark		\checkmark	\checkmark		\checkmark	
Least Restrictive Environme	35. Identifywith knowledgeable stakeholderscore research-based practices that provide evidence of effective inclusive education, including universal design/differentiated instruction and co-teaching.	\checkmark		\checkmark	\checkmark	\checkmark	\checkmark	
east Restric	36. Based on the research-based practices for co-teaching identify schools that are implementing these practices effectively and analyze the performance of students who are co-taught, compared with other students with and without disabilities.		\checkmark					\checkmark
I	37. Analyze the risk ratio of African American males placed in schools outside of PPS, compared with students from other subgroups.	\checkmark	\checkmark		\checkmark		\checkmark	

AREAS	Recommendations	Meet	Data	Write	PD	Communicate	Accountability	Fiscal
	38. Develop a report that analyzes the following data districtwide, by school, and grade band, and group schools associated with each assistant superintendent: the percentage of students with disabilities educated in general education classes more than 80 percent; 80 percent to less than 40 percent; and more than 40 percent.		\checkmark		\checkmark		\checkmark	
	39. Develop a monthly and annual report showing the number and percentage of students each school transfers to another school for special education services by reasons for the transfers.		\checkmark		\checkmark		\checkmark	
	40. Continue to develop strategies and programs that would permit students with disabilities to attend their home school or school-of-choice with appropriate supports and services.	\checkmark						\checkmark
Continued	41. Consider ways in which services could be improved in order to meaningfully support students with significant emotional/behavioral needs at the middle and high school levels within the district.	\checkmark		\checkmark	\checkmark		\checkmark	\checkmark
Least Restrictive Environment (LRE) - Continued	42. Review the Holy Family Institute program at Westinghouse High School to identify ways in which the students might be allowed to have meaningful interaction with the schools' general education population.	\checkmark					\checkmark	\checkmark
Environme	43. Offer to collaborate with PFT in providing professional development related to effective inclusive practices, including universal design/differentiated instruction, and co-teaching.	\checkmark						
trictive	44. Take appropriate steps quickly to ensure that all special educators have access to grade level and/or content area meetings.					\checkmark	\checkmark	
Least Res	45. Develop an "IEP At a Glance" summary sheet with knowledgeable stakeholders that would include the most important IEP-related information for distribution to students' teachers and other staff having a "need to know."	\checkmark		\checkmark	\checkmark	\checkmark		\checkmark
	46. Review the configuration of services for students who are gifted and have IEPs identify strategies that would enable those currently in full-time special education classes to be educated in regular gifted classes for core curriculum areas with support and differentiated instruction.	\checkmark		\checkmark	\checkmark	\checkmark		
	47. Contact CEP representatives and discuss how its program could be modified to provide special education and related services.	\checkmark						\checkmark
	48. Convene representatives of PPS' leadership team to review data on the enrollment of students receiving special education services in charter schools and magnet programs to consider any inequitable access and negative impact that choice programs may be having on comprehensive high schools with respect to their disability incidence rates.	\checkmark	\checkmark				\checkmark	
Fiscal	49. Review the Holy Family Institute program and determine whether PPS has the capacity to implement those elements that are effective in improving student performance.	\checkmark						\checkmark

AREAS	Recommendations	Meet	Data	Write	PD	Communicate	Accountability	Fiscal
	50. Determine whether there are any data to support the perception that one or more charter school has released students with disabilities inappropriately and/or that the timing of this release was suspect based on funding schedules.		\checkmark				\checkmark	\checkmark
ont)	51. Consider ways in which PSE and district transportation staff could collaborate to reduce transportation costs.	\checkmark						\checkmark
Fiscal (Cont)	52. Investigate and analyze whether contractual use of paraprofessionals and bus aids is more costly than using PSS employees.	\checkmark	\checkmark					\checkmark
I	53. As a long-range goal, explore strategies that would allow school districts to access the 60 percent funding for in-district programs currently available only for APS students.	\checkmark						\checkmark
	54. Review the rules for blending Title I and IDEA funds in schools with schoolwide Title I programs and, if eligible, determine whether this funding model would be beneficial	\checkmark				\checkmark		\checkmark
	55. Review PULSE to ensure that components include gathering of evidence on special education.	\checkmark	\checkmark		\checkmark		\checkmark	
oility	56. Review RISE to ensure that its components include the gathering of evidence pertaining to the faithful implementation of RtI/PBIS, universal design/differentiated instruction and inclusive special education practices.	\checkmark	\checkmark		\checkmark	\checkmark	\checkmark	
Accountability	57. Review the elements related to the tracking of Pittsburgh Promise recipients and ensure they include disability status to facilitate data analysis and planning for this group of students.	\checkmark	\checkmark				\checkmark	
	58. Join with other districts to approach PDE regarding its development of interim and unit assessments aligned with PSSA-M.	\checkmark					\checkmark	
	59. See relevant recommendations from other sections pertaining to accountability.						\checkmark	

CHAPTER 5. SYNOPSIS AND DISCUSSION

The Pittsburgh Public Schools (PPS) has made important strides over the last five years. The district has substantially increased student achievement; it has begun to narrow some of its racially identifiable achievement gaps; it has initiated a cutting-edge new scholarship program; it has attracted major new investments; and it has built the instructional architecture for future academic progress for its students.

Moreover, the progress extends to the district's students with disabilities, a group that challenges many city school systems. The PPS has seen decreases in the numbers of its students categorized as needing special education. The district met its Adequate Yearly Progress (AYP) targets among students with disabilities—a rare achievement among urban school districts. It increased the rate at which students with disabilities were graduating from school. It is developing a strong and well-articulated three-tiered system for both instructional and behavioral interventions. It reduced the number of dropouts among students with disabilities and increased the percent of its graduates who were employed. The district also began to develop a system of co-teaching with its special education students that holds promise for additional academic gains. It has attracted excellent staff and worked to build greater collaboration around the needs of students with disabilities. It has instituted a positive behavior program that holds substantial promise. It has established strong working relations with the teachers union around the instruction of special education students. It has provided a substantial amount of professional development to teachers and other staff members. It has made progress in providing instruction for its students with disabilities in a least restrictive environment. And the district has very few due process cases.

In many respects, the Pittsburgh Public Schools has programming for its students with disabilities that is more advanced and sophisticated than the Council of the Great City Schools often sees when it reviews its member districts' efforts.

Still, the PPS continues to face substantial challenges for students receiving special education services. The incidence rate continues to be higher than state and national averages, and higher than that of most city school systems as well. The district substantially over-identifies African American students as having a disability. It also suspends these students at disproportionately high rates. The district has an important and evolving school-based accountability system, but the system lacks meaningful components around the performance of students with disabilities. The district's ability to ensure that these students have full access to the general education curriculum needs work. The district does not have a comprehensive policy and procedure manual to describe how staff members will implement federal and state legal requirements. The organizational structure used to administer programs for students with disabilities is badly fragmented and is not very functional and efficient. It is not clear how faithfully the district implements its programs. And many of its signature programs lack much overt recognition of the unique needs of special education students.

The Council's Strategic Support Team finds most of these issues—and many others—in the vast majority of other big city school systems that it reviews. What is more encouraging in Pittsburgh is that the school district, its leadership, and staff appear determined to do something

about the challenges rather than waiting for someone else to tackle the problems. It was also clear to the Council's team that the district was moving in the right direction on many of the initiatives the community would want. The team had a number of proposals to the district to improve its ability to get the most from its reforms, especially those that could affect the learning of students with disabilities.

The Strategic Support Team proposed that the district tighten its eligibility rules for special education services. It proposed to overhaul the organizational structure and staffing of the district's special education department. It recommended making accountability systems more explicit in meeting the needs of special education students. It proposed ways to strengthen progress monitoring. It suggested standardizing the district's policies and procedures. It proposed intervening in schools with disproportionate referral and suspension rates, particularly among African American students. It advanced suggestions to improve the district's interventions and how they are applied, along with many other steps.

Over the long run, the district's high incidence rate may come down as the district improves its instructional program, particularly in reading, and provides increasingly intensive interventions through RtI and PBIS. It was clear to the team, however, that too many teachers and staff members were using special education as an escape hatch when they did not know what else to do with students who were experiencing learning or behavioral problems. This is not an unusual situation in many public school systems across the country, but the Pittsburgh Public Schools has the potential to make a real dent in the problem because of its determined leadership, strong collaboration with its teachers union, and its forward momentum.

The Pittsburgh schools have a checkered history in its efforts to successfully integrate its schools and classrooms to serve all students. The data presented in this report suggest that traces of this history remain. But the Council's team thought that the district was on the right track with its reforms and was confident that the community could be confident on greater gains in the future. There is no reason to think that the public schools of the Great City of Pittsburgh couldn't be one of the finest in the nation if it stays the course and addresses the issues presented in this report. The Council stands ready to help in any way the district needs.

APPENDICES

Appendix A.	Comparison o	f Staffing Ratios:	Urban School Districts
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	Incidence		Special	Ed Tea	chers	Para	educate	ors		Speech/	Languag	e	Psy	chologi	sts
	۵X			Rati	o To:		Ratio	o To:			Ratio	o To:		Rati	o To:
	% Students w/Disability	SwD Enrollment	Number	SwD	Enroll- ment	Number	SwD	Enroll- men	Number	% S/L Licensed*	SwD	Enroll- ment	Number	SwD	Enroll- men
Alexandria City, VA	17.4	900	199	10	55	201	9	54	27		70	405	21	90	520
Atlanta, GA	8.8	4200	659 ¹⁶	7	79	211	20	296	55		76	945	24	175	2166
Boston, MA	20.5	11534	1200	10	47	800	14	70	147		78	383	48	240	1173
Buffalo, NY	17.8	9289	798	12	65	402	23	130	125		74	417	52	179	1003
Chicago, IL	12.5	52409	3753	14	112	2905	18	145	392		134	1072	235	223	1788
Clark County, NV	10.9	31921	3019	11	98	2087	15	141	257		124	1145	153	209	1923
Dallas ISD, TX	8.1	13000	880	15	182	750	17	213	105	.86	124	1524	52	250	3077
Evanston, IL	19.6	1238	94	13	67	92	13	69	24		52	263	12	103	526
Hartford, CT	15.9	3883	289	13	84	240 ¹⁷	16	102	46		84	531	23	168	1062
Homewd-Floss IL	9.2	267	18	15	162	23	12	127	1.6		166	1819	1.8	148	1617
Kalamazoo, MI	13.0	1462	68	22	154	63	23	167	11.5		127	913	11.5	127	913
Kyrene, AZ	10.3	1909	126	15	147	100	19	185	37		52	501	14	136	1323
Lakota, OH	8.8	1547	115	14	152	120	13	146	30.4		51	576	11	141	1593
Los Angeles, CA ¹⁸	9.65	76752	4971	17	149	7490	11	100	122		700	6073	566	151	1309
Memphis, TN	15.5	18226	854	21	138	683	27	173	56	.96	325	2105	61	299	1932
Miami-Dade, FL	11.6	39,758	2886	13	119	1445	27	237	204		194	1679	229	174	1496
New Bedford, MA	20.4	2778	230	12	59	305	9	45	33		84	412	10	277	1359
Newport, RI	21.6	650	22	30	136	35	19	86	6	.96	108	500	3	216	1000
NYC, NY ¹⁹	11.1	137930	11810	13	105	12516	12	99	2015		75	617	1170	128	1062
Norfolk, VG	13.89	37,000	428	12	86	237	22	156	42		122	881	23	223	1608
Passaic City, NJ	17.2	13563	187	73 ²⁰	422	135	100	584	19		714	4150	19	714	4150
Philadelphia, PA	13.3	26,980	1564	17	104	547	49	298	99		273	1647	101	167	1614
Pittsburgh, PA	18.2	5,096	359	14	78	252	20	110	40		127	700	16	319	1749
Pr. George's, MD	11.6	15362	1258	12	106	1125	14	118	67		229	1985	71	216	1873
Rochester	17.97	6019	681	9	49	491	12.3	68	132		45	253	62	97	540
San Diego	12.1	16,200	1433	11	93	1283	12.6	104	189		86	709	124	131	1081
South Bend, IN	26.5	5573	350	16	60	306	18	69	48	.9	116	438	19 ²¹	293	1105

²¹ Includes 4 diagnosticians

¹⁶ Includes central office administrators
¹⁷ From 2004-5 Hartford School District Strategic School Profile
¹⁸ From 8/26/05 NYC, NY report (see F.N. 4) Data from Los Angeles Public Schools (04/05) - *
¹⁹ 03-04 data from Tom Hehir, et. al., Report of NYC August 26, 2005 - *
²⁰ This ratio appears to be unusually large and may be due to an error in reporting.
²¹ Includes 4 disconstructions

	Incidence Special E			Ed Tea	chers	Para	educate	ors	;	Speech/	Languag	e	Psychologists														
	ŝ			Ratio To:		Ratio To:			Ratio To:		Ratio To:				Ratio To:		Ratio To:		Ratio To:		Ratio To:		Ratio To:			Rati	о То:
	% Students w/Disability	SwD Enrollment	Number	SwD	Enroll- ment	Number	SwD	Enroll- men	Number	% S/L Licensed*	QwS	Enroll- ment	Number	SwD	Enroll- men												
Stafford, TX	9.6	289	24	12	125	16	18	187	6	.16	48	500	2	144	1500												
St. Louis, MO	16	5696	652	9	54	229	25	154	97	.79	59	363	35	163	1007												
Sun Prairie, WI	13.5	810	63	13	95	150	5.4	40	14		57	425	5	162	1200												
Trenton PS, NJ	19.5	2679	225	12	61	175	15	78	22		122	624	15	179	915												
Webster, MA	17.6	349	316	17	96	28	12	71	6	.83	58	331	1.2	291	1653												
Waukegan, IL	16.1	2657	171	15	96	131	20	125	33		81	503	17	156	970												
Yonkers, NY	14.9	3830	326	12	79	290	13	89	30		128	857	32	120	803												
U. S.				16			18				157			223													

	So	cial Wo	orkers		Nurses	i	Occupational Therapists				Physical Therapists				
		Ra	tio To:		Rati	io To:			Ratio	o To:			Ratio	о То:	
	Number	SwD	Enroll- ment	Number	SwD	Enroll- ment	Number	Licensed*	SwD	Enroll- men	Num- ber	Lic.	SwD	Enroll- men	
Alexandria City, VA	25	76	437	17	112	643	8		238	1366	3		633	3643	
Atlanta, GA	33	127	1576	27	156	1926	6		700	8667	3		1400	17333	
Boston, MA	6			100	115	563	67		172	840	17		680	3312	
Buffalo, NY	36	258	1449	44	211	1186	53	.43	175	984	16.4		566	3181	
Chicago, IL	358	119	1174	336	156	1250	106		494	3964	37		1416	11355	
Clark County, NY	10	-	-	166	192	1773	76		420	3872	28	.89	1140	10500	
Dallas ISD,TX	28	464	5714	183	71	874	16		813	10,000	1		-	-	
Evanston, IL	25	50	253	18	69	351	5		248	1263	1		1238	6314	
Hartford, CT	71	54	344	57 ²²	68	428									
Homewood-Flossmor IL	3	89	970	1	267	970	.5		534	5822	0				
Kalamazoo, MI	4.5	325	2333	2	731	5250	1.5		975	7000	1		1462	10500	
Kyrene, OH	6	318	3088	4	477	4630	8	.38	239	2316	2		955	9265	
Lakota, OH	2	773	8760	14.5	107	1208	8	.5	193	2190	2	.5	773	8760	
Los Angeles, CA	38	-	-	NA	-	-	140		610	5293	24		3560	-	
Memphis, TN	41	445	2875	46	396	2562	18	.63	1013	6548	13.5	.93	1350	8730	
Miami-Dade, FL	151	263	2268	195	204	1757									
New Bedford, MA	38 ²³	73	358	29	96	469	8	.75	347	1699	3		926	4531	
Newport, RI	3	217	1000	5	130	600	3	.33	217	1000	2		325	1500	
NYC, NY	1440	104	863	N/A	-	-	1151		131	1080	625		241	1988	
Norfolk, VG	23	223	1609	-			13	.92	395	2846	7		734	5286	
Passaic City, NJ	19	714	4150	30	452	2628	С				С				
Philadelphia, PA		-	-	251	108	650	23		1173	7090	20		1349	8153	
Pittsburgh, PA															
Prince George's Cty, MD	5	-	-	208 ²⁴	74	639	56		274	2375	27	.96	569	4926	
Rochester	69	87	485				34		177	985	9		668	3721	
San Diego				41	395	3268	41		395	3268	10		1620	13,400	
South Bend, I	25	223	840	24	232	875	12	.92	464	1750	3	.33	1857	7000	
Stafford, TX	0	-	-	5	57	600	1		289	3000	1		289	3000	
St. Louis, MO	48	119	734	86	66	410	21		271	1678	5		1139	7048	
Sun Prairie, WI	5.6	144	1071	1	810	6000	5		162	1200	2.6		311	2307	
Trenton PS, NU	45	60	305	21	128	653	5		536	2744	1		2679	13720	

Social Workers, Nurses, OTs & PTs

²² Includes 7 nurse practitioners;
 ²³ Refers to School Adjustment Counselors

²⁴ Includes 48 vacancies

	Social Workers			Nurses			Occupational Therapists				Physical Therapists					
		Ratio To:		Ratio To:			Rati	io To:			Ratio	o To:			Ratio	o To:
	Number	SwD	Enroll- ment	Number	SwD	Enroll- ment	Number	Licensed*	SwD	Enroll- men	Num- ber	Lic.	SwD	Enroll- men		
Webster, MA	1.5	233	1322	3	116	661	2.2	.54	159	902	1		349	1984		
Waukegan, IL	28	91	580	27 ²⁵	98	610	12.6	.84	211	1308	5	.8	332	3296		
Yonkers, NY	16	239	1605	54	71	476	32		120	803	14		274	1835		
U. S.		363							472				959			

Source: Comparison of Staffing Ratios: Urban Special Education Leadership Collaborative Survey (2005-6); Miami-Dade School District 2009; Chicago Public Schools 2009; Boston Public Schools (2009); Public Schools (2008); Rochester Public Schools (2008)

²⁵ Includes 16 certified school nurses



Appendix B. Proposed and Current Organizational Structures





Differences between Current and Proposed PSE Structures

Current Structure	Suggested Structure
1 Senior Program Officer 3 Program Officers 4 Clerks	 Executive Director Senior Program Officer Program Officer Program Specialist Administrative Assistant Clerks
 13 Supervisors 1 Autism Support 1 Life Skills/Multiple Disabilities Support/PA Alternate Assessment 1 Inclusion Support 	8 Supervisors - 5 1 Autism Support 1 Life Skills/MD Support/PA Alt Assesst 1 Inclusion Support
 Behavior Specialist Interagency Coordinator Social Work Liaison 	1 Behavior Support1 Interagency Coordination1 Out-of-District Support-0
 Community Based Voc Ed Facilitator Start on Success Itinerant Teacher Transition Facilitator City Connection Coordinators Travel Trainer Facilitator 	4 Transition Support 1 Travel Trainer Support -1
1 Records Clerk 1 Data Entry Clerk 1 Program Funding 1 Funding & Compliance	 Data Clerk Fiscal Support SDSS Data Clerk (data entry 'til Encore imp -1 & -1 SDSS clerk (after Encore implemented)
1 Psychology Clerk 1 Extended Schl Year/Alternate Asses 1 Progress Monitoring	1 Speech/Language, Hear, Vis Support Transfer Progress Monitoring function to District Unit responsible for this function. Incorporate ESY/PASA into other staff functions. -2
 Reading Coach Wilson Language Trainer Psychology Support Encore System Support Assistive Technology (AT) Support AT Assistant 	1 Reading Coach1 Wilson Language Trainer1 Psychology Support1 Encore System Support1 AT Support1 AT Assistant-0

Appendix C. Individuals Interviewed

- Mr. Mark Roosevelt
- Dr. Linda Lane
- Tricia Gennari
- Mary Jane Conley
- Susan Wiegand,
- Lillian Wright
- Linda Zilka
- Jerri Lippert,
- J. Kaye Cupples
- Jeannine French
- Derrick Lopez
- M'Liz Held
- James Palmiero
- Donna Westbrooks-Martin (submitted material)
- Linda Schachter
- Sylbia Kunst
- Tracy Brezicki
- Thomas Spickler
- Magi Berger
- Jocelyn Kramer (via phone)
- Ira Weiss
- Janis Ripper
- Ann Herrmann
- Rosemary Nilles
- Sandra Laux
- Holly Sousa
- Danielle Frye
- Jennifer Gruber
- Timothy Knight
- Marianne Trachok
- Patricia Zinger
- Lara Evans
- Ann Fillmore
- Dealyn Allen
- Paulette Colonna
- Debra Gloster
- Noel Hustwit
- Cheryl Kennedy
- Cynthia McKenzie
- Mindy Moody
- Dorothea Serzega

- Kathy Wooddell
- Kimberly Zangrilli
- Colleen Coudriet
- Jamie Crowell
- Joseph Altman
- Amy Devinney
- Nina Esposito-Visgitis
- JohnTarka
- Mary Van Horn
- Chris Berdnik
- Peter Camarda
- Dan Simmers
- Roberta Strauss
- Erica Grant
- Darlene Adamski
- Bud Bergi
- Julia Stewart
- Mary Jane Colen
- Megan Piscitelli
- Jessica Colbert
- Amber Dean
- Demetra Kontoulis
- Crystal Evans,
- Ashley McFall
- Gail Bair
- Susan Wetzel
- Kristen McIntire
- Peg Fitzgerald
- Deborah Caterino
- Vincent Lewandowski
- Viola Burgess
- LaVerne Anthony
- Valerie Lucas
- Toni Kendrick
- Debra Rucki
- James Nath
- John Vater
- Melissa Friez
- Jane Doncaster
- Rudley Mrvos
- Sylbia Kunst
- Barbara Rudiak
- Christiana Otuwa

- Christine Buffington
- Amy Guthrie
- Liz Healey
- Paulette Poncelet
- Ted Vasser

Appendix D. Documents Reviewed

- Overall Goals of PPS
- Safe and Orderly Environment for All Students and Employees, including Chart of Student Services Plan Required Components Related
- PPS Revised Final Draft Strategic Plan-Version 6
- Curriculum, Instruction and Professional Development Organization Chart
- Office of the Superintendent Organization Chart
- Office of Instruction, Assessment and Accountability Organization Chart
- Office of Chief of Staff and External Affairs Organization Chart
- Office of Research, Assessment and Accountability Organization Chart
- Office of Information and Technology Organization Chart
- Chief Operations Office Organization Chart
- Office of Human Resource Organization Chart
- Office of Finance Organization Chart
- Senior Program Officer and Staff of ESE Job Descriptions including:
 - o Descriptions of Behavior Specialists
 - Descriptions of Curriculum Support Specialists
 - o Descriptions of Inclusion Support Specialists
 - Descriptions of Itinerant Support Specialists
 - Progress Monitor Facilitator Description
 - o Assistive Technology Consultant and Encore Systems Administrator
 - Start on Success Itinerant Teacher
 - PSE Transition Facilitator
- 2009-10 Student Success: Leadership Matters
- Mathematical Observation Form
- Elementary Literacy K-2 Teaching and Learning Feedback Tool (Revised 7-01-09)
- "Getting Results" 2008-2010 Continuous School Improvement Plan
- Elementary Literacy Grades 3-5 Teaching and Learning Feedback Tool
- ELA Grades 6-12 Teaching and Learning Feedback Tool
- Science Teaching and Learning Feedback Tool
- Getting Results 2008 to 2010 Continuous School Improvement Plan- 2 Year Plan (Roosevelt Pre K-5; South Hills Middle; Sunnyside K-8; and High Schools)
- Intermediate Unit Special Education Plan Document 2009-10 School Year
- Instructional Handbook English 6-12
- Wilson Reading Systems: Tier 3 Interventions Currently Implemented in Special Education
- Assistant Superintendents Offices and School Listing 2009-10
- Phases of Continuous Improvement Planning
- Pittsburgh Public Schools Demographic Data
- Pittsburgh Public Schools Referrals for Special Education Evaluations
- Pittsburgh Public Schools IEP and Placement Data (06-07; 07-08)
- Instructional Support Team 1992-August 2008

- Multiple Documents for Response to Intervention for PPS; Including Excellence for All, RTI Tier 2 and 3 for Leadership Academy October 2008; RTI Reading Grades K-5 etc.
- Grading Guidelines/Elementary Literacy
- IDEA Compliance Verification PA Department of Education
- PaTTAN Review of Indicator 13 and 14
- State Performance Plan Indicators
- Due Process Requests
- Inclusive Practices Training
- Professional Development Training Calendar
- Psychological Assessments
- PSSA Letter from Superintendent Roosevelt for Achieving District AYP Status
- Guide to Offerings and Options in PPS for 2010-11
- Magnet & Choice Request Form
- District AYP Data broken down by grades and subgroups
- Graduation and Drop-out Rates
- IEP Students by Grade and School
- Special Education Expenditures by Area of Disability
- 2007-8 Cost per pupil vs. Allegheny County Average
- 2009-10 Special Education Program Budget
- Special Education Solutions Based on the 2007 Costing Out Study by the Commonwealth
- Commonwealth of PA Special Education Final Expenditure Report
- Intermediate Unit Transportation Fiscal Report School Year 08-09
- Sample IEP
- Pittsburgh RISE: Research-based, Inclusive System of Evaluation Version 8
- PPS Program for Students with Exceptionalities Psychological Services MR Committee
- CITY Connections: Creating Individualized Transitions for Youth
- Travel Training Instruction Manual
- Referrals and Training of Travel Training Students
- African Americans in Outside Placements
- PPS Suspensions and Expulsions 05-6; 06-7; 07-8; 08-9
- Code of Student Conduct
- Evaluation of Initiatives in PPS Excellence for All Agenda: Impact of Positive Behavior Intervention System
- PPS Program for Students with Exceptionalities Blind/ Visually Impaired Support Program
- PPS Program for Students with Exceptionalities Speech and Language Support Program
- Risk Ratio Data for Reading and Math

Appendix E. Team Agenda

Tuesday, November 17, 2009

700-9:00 PM	Team Dinner and Meeting Assistant Superintendent of Support Services
	Tuesday, November 17, 2009
7:00-9:00 PM	Team Dinner and Meeting Assistant Superintendent of Support Services And Senior Program Officer/Director, PSE
	Wednesday, November 18, 2009
8:15-9:00 AM	Mr. Mark Roosevelt, Superintendent and Dr. Linda Lane, Deputy Super.
9:00-10:00 AM	Assistant Superintendent, Support Services And Senior Program Officer/Director, PSE
10:00-11:00 AM	Program Officers
11:00-12:00 PM	Chief Academic Officer, Assistant Superintendent K-8 (no show) Assistant Superintendent Secondary Schools ESL Curriculum Supervisor (no show)
12:00-12:30 PM	LUNCH
12:30-1:30 PM	State Bureau of Special Education (Advisors from the State of Pennsylvania)
1:30-2:30 PM	Speech/Language Supervisor (materials submitted) Lead Psychologist, Principal Pioneer Education Center Interagency Coordinator/Counselor, Social Worker Senior Program Officer Counselors
2:30-2:45 PM	Break
2:45-3:45 PM	Special Education Attorneys
3:45-4:45 PM	Special Education, Learning Support and Emotional Support Teachers
3:45-4:45 PM	Autistic Support Teacher, Life Skills Support Teacher, Vision Itinerant, Inclusion Facilitator
5:00-6:00 PM	General Education Teachers

6:00 PM-Midnight Working Dinner with Mary Jane Conley, Senior Program Officer, and Team Work

Thursday, November 19, 2009

- 8:00-9:00 AM Special Education Supervisors
- 9:00-10:00 AM Coordinator of Behavioral Health, Program Officer, Facilitator Behavioral Support, Representatives from Community Organizations, Community Behavior Health, Residential Treatment Facilities
- 10:00-11:00 AM Representatives of PFT
- 11:00 AM-12:00 Chief Financial Officer, Executive Director of Budget, Facilitator Funding & Compliance, Program Funding Assistant and Instructional Technology
- 12:00-12:30 LUNCH
- 12:30-1:30 PM Deputy Chief of High School Reform and Representative of CTE Programs, Assistant Superintendent Secondary Schools, Executive Director of Career & Technical Education
- 1:30-2:30 PM Middle & Secondary Schools Instructional Teacher Leaders Including Curriculum Writer and Literacy Coach
- 2:30-3:15 PM Transition Personnel, Community Based Vocational Program Representative and Travel Training Personnel
- 3:30-4:30 PM Principals Elementary, Middle and Secondary
- 4:30-5:00 PM Assistant Superintendent K-5, Assistant Superintendent, ALA & Middle Schools
- 5:00-6:00 PM Parents Representing Local Task Force for Rights to Education and Parent Involvement Network
- 6:00-6:30 PM Chief of Research Assessment & Accountability
- 6:30-7:00 PM Director of Transportation
- 7:00 PM -1 AM Working Dinner and Debriefing from the day; Work on Initial Findings on Areas of Concern

Friday, November 20, 2009

- 8:30 12:30 Prepare for meeting with Superintendent, Complete work on recommendations
- 12:30-1:00 Working Lunch
- 1:00-2:00 Debriefing of Superintendent, Deputy Superintendent, Assistant Superintendent Support Services and Senior Program Officer/Director, PSE

Appendix F. Strategic Support Team

Sue Gamm, Esq.

Sue Gamm, a nationally recognized expert on special education, formerly served as Chief Specialized Services Officer for the Chicago Public Schools and Division Director for the Office for Civil Rights, Region V (Illinois, Minnesota, and Wisconsin). She has participated on Strategic Support Teams provided by the Council of the Great City Schools for school districts in the District of Columbia (1998), Guilford County, N.C., (2003), Richmond, Va., (2003), St. Louis (2003), Charleston, (2005), Milwaukee (2007), New York City, District 75 (2008), Rochester (2008), Boston (2009), and Philadelphia (2009). Ms. Gamm recently served as consulting attorney on the Council's amicus brief in support of the New York City Board of Education in Board of Education of the City School District of the City of New York v. Tom F., On Behalf of Gilbert F., A Minor Child (2007). She currently consults with the Illinois State Board of Education on the state's monitoring of the Chicago Public Schools on least restrictive environment (LRE) as part of the district's implementation of the Corev H. v. ISBE settlement agreement. Further, she consults with the Public Consulting Group and numerous school districts and state educational agencies and provides training at national, state, and local conferences on special education matters, particularly in the area of special education disproportionality. Ms. Gamm was an expert in 2006 for the plaintiffs in Blackman v. District of Columbia, et. al., Civil Action No. 97-1629 (PLF) Consolidated with Civil Action No. 97-2402 (PLF) in the areas of special education policies, procedures, and practices. In Baltimore, she completed a review of special education services in 2004-05 for the city's public schools and was an expert for plaintiffs Vaughn G., et al. v. Mayor and City Council of Baltimore, et al., Civil Action No. MJG-84-1911. Ms. Gamm has also done extensive special education consultation on LRE issues for the Los Angeles County School District and is a consultant for the class action consent decree in Los Angeles. Finally, Ms. Gamm has provided expert advice over the past five years to the New York City Board of Education. This assistance included writing a Principal's Quick Reference Guide to Special Education (2003). Ms. Gamm graduated with high honors from University of Illinois with a B.A. degree in regular and special education (1970) and earned a law degree from the De Paul College of Law (1976). She is admitted to practice before the Illinois Bar, the Federal, Bar and the U.S. Supreme Court Bar.

Leah Kelly

Leah A. Kelly is the Executive Director for Student Support Services in Broward County, Fla., the sixth-largest school system in the nation. She has been in this position for more than four years and was the special education director for six years prior to that. Her background includes being the supervisor for specific learning disabilities services in Broward County for 10 years, a child find specialist and a learning resources specialist in the Sarasota schools prior to that, as well as teaching students with emotional handicaps and learning disabilities. Ms. Kelly also has served as an adjunct professor at Florida Atlantic University, teaching both undergraduate and graduate courses in special education. In addition, she serves on the State Advisory Council for Special Education for the Florida Department of Education. She has provided consultative services to districts in Arkansas, Texas, and Mississippi in areas related to cooperative consultation and differentiated instruction to better meet the needs of students with disabilities.

She has worked with the Council of Great City Schools in providing district assistance to members of the Council and has worked with the Council in addressing federal legislators as the Individuals with Disabilities Education Act was being reauthorized in 2004. Ms. Kelly earned a bachelor's degree from Syracuse University and earned a master's degree from the State University of New York at Binghamton under a full fellowship. She completed coursework and received her certificate in educational leadership at Florida Atlantic University.

Brenda Taylor

Brenda B. Taylor is the Deputy Chief of Specialized Instructional Services for the School District of Philadelphia. In this position, she is responsible for overseeing programs and services in the areas of physical health, behavioral health, prevention and intervention, homeless student support and special education-ensuring that all such programs are in compliance with federal law and meeting the needs of the population of students that the district serves. She has developed and directed the implementation and administration of the district's policies and procedures aimed at maximizing the delivery of services that positively drive student achievement. Accomplishments in the area of special education under Ms. Taylor's leadership include: increasing the district's special education compliance rate for more than 26,000 students to 99 percent; developing a Web-based special education documentation system to ensure compliance with special education policies and procedures at both the federal and state levels; the Access to the Core Strategies Guide (a companion to the district's core developing curriculum) to support teachers and staff with meeting the needs of diverse learners; developing after-school on-site programs for students living in emergency/transitional housing; initiating annual districtwide counselor and psychologist conferences to ensure research-based best practices related to academic and behavioral intervention planning; collaborating with the Philadelphia Department of Behavioral Health to develop and successfully implement schoolbased programs that address the needs of students with various behavioral health diagnoses; developing a new social service model that increased the level of services available at the school level to support reducing barriers to learning; partnering with the University of Pennsylvania to support the success of teachers assigned to autistic support programs; and successfully initiating a partnership with Temple University to develop a leadership academy for current and aspiring directors of special education. Ms. Taylor is a graduate of the School District of Philadelphia and has more than 34 years of experience working on behalf of the students in the district. Before assuming her current position as a deputy chief in the district, she served as a grade-school teacher, special education teacher, special education supervisor, assistant principal, and administrator. Her passion is in working directly with parents and students to develop positive outcomes. She has worked in both elementary and secondary settings. In addition to her credentials as a teacher of elementary and special education, Taylor holds certification for elementary principal, secondary principal and superintendent.

Julie Wright Halbert, Esq.

Julie Halbert has been legislative counsel for the Council of the Great City Schools for more than 14 years. In that capacity, she has served as a national education legal and policy specialist, with emphasis on special education. She worked extensively on the reauthorization of the Individuals with Disabilities Education Act (IDEA) in 1997 and 2004. Ms. Halbert is responsible for drafting

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

Appendix G. About the Council

Council of the Great City Schools

The Council of the Great City Schools is a coalition of 67 of the nation's largest urban public school systems, including Pittsburgh's.²⁶ The organization's Board of Directors is composed of the Superintendent, CEO or Chancellor of Schools, and one School Board member from each member city. An Executive Committee of 24 individuals, equally divided in number between Superintendents and School Board members, provides regular oversight of the 501(c)(3) organization. The composition of the organization makes it the only independent national group representing the governing and administrative leadership of urban education and the only association whose sole purpose revolves around urban schooling.

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

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

²⁶ Albuquerque, Anchorage, Atlanta, Austin, Baltimore, Birmingham, Boston, Broward County (Ft. Lauderdale), Buffalo, Caddo Parish (Shreveport), Charleston County, Charlotte-Mecklenburg, Chicago, Christina (Delaware), Cincinnati, Clark County (Las Vegas), Cleveland, Columbus, Dallas, Dayton, Denver, Des Moines, Detroit, Duval County (Jacksonville), East Baton Rouge, Fort Worth, Fresno, Guilford County (Greensboro, N.C.), Hillsborough County (Tampa), Houston, Indianapolis, Jackson, Jefferson County (Louisville), Kansas City, Little Rock School District, Long Beach, Los Angeles, Memphis, Miami-Dade County, Milwaukee, Minneapolis, Nashville, Newark, New Orleans, New York City, Norfolk, Oakland, Oklahoma City, Omaha, Orange County (Orlando), Palm Beach County, Philadelphia, Pittsburgh, Portland, Providence, Richmond, Rochester, Sacramento, Salt Lake City, San Diego, San Francisco, Seattle, St. Louis, St. Paul, Toledo, Washington, D.C., and Wichita

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

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

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

Cincinnati		
	Curriculum and Instruction	2004
	Curriculum and Instruction	2009
Chicago		
	Warehouse Operations	2010
Christina (DE)	The second se	
	Curriculum and Instruction	2007
Cleveland		
	Student Assignments	1999, 2000
	Transportation	2000
	Safety and Security	2000
	Facilities Financing	2000
	Facilities Operations	2000
	Transportation	2004
	Curriculum and Instruction	2005
	Safety and Security	2007
	Safety and Security	2008
	Theme Schools	2009
Columbus		2003
Cordinous	Superintendent Support	2001
	Human Resources	2001
	Facilities Financing	2002
	Finance and Treasury	2003
	Budget	2003
	Curriculum and Instruction	2005
	Information Technology	2007
	Food Services	2007
	Transportation	2009
Dallas	Transportation	2009
Dunus	Procurement	2007
	Staffing Levels	2009
Dayton		2007
Dujton	Superintendent Support	2001
	Curriculum and Instruction	2001
	Finance	2001
	Communications	2001
	Curriculum and Instruction	2002
	Budget	2005
	Curriculum and Instruction	2005
Denver	Currentain and instruction	2000
	Superintendent Support	2001
	Personnel	2001
	Curriculum and Instruction	2001 2005
		2003

	Bilingual Education	2006
	Curriculum and Instruction	2008
Des Moines	Currentum and instruction	2000
Des Momes	Budget and Finance	2003
Detroit	Budget and Finance	2005
Denon	Curriculum and Instruction	2002
	Assessment	2002
	Communications	2002
	Curriculum and Assessment	2002
	Communications	2003
	Textbook Procurement	2003
	Food Services	2004
	Curriculum and Instruction	2007
	Facilities	2008
	Finance and Budget	2008
	Information Technology	2008
	Stimulus planning	2009
	Human Resource Operations	2009
Greensboro		
	Bilingual Education	2002
	Information Technology	2003
	Special Education	2003
	Facilities	2004
	Human Resources	2007
Hillsborough County (FLA)		
	Transportation	2005
	Procurement	2005
Indianapolis		
	Transportation	2007
Jackson (MS)		
	Bond Referendum	2006
	Communications	2009
Jacksonville		
	Organization and Management	2002
	Operations	2002
	Human Resources	2002
	Finance	2002
	Information Technology	2002
	Finance	2006
Kansas City		
	Human Resources	2005
	Information Technology	2005
	85	

	Operations	2005
	Purchasing	2006
	Curriculum and Instruction	2006
	Program Implementation	2007
	Stimulus Planning	2009
Los Angeles	Sumulus Flamming	2007
Los migeres	Budget and Finance	2002
	Organizational Structure	2002
	Finance	2005
	Information Technology	2005
	Human Resources	2005
	Business Services	2005
Louisville	Busiliess Services	2005
Louisville	Managamant Information	2005
	Management Information	2005
Manuali	Staffing study	2009
Memphis		2007
	Information Technology	2007
Miami-Dade County	a	
	Construction Management	2003
	Food Services	2009
	Transportation	2009
	Maintenance & Operations	2009
	Capital Projects	2009
Milwaukee		
	Research and Testing	1999
	Safety and Security	2000
	School Board Support	1999
	Curriculum and Instruction	2006
	Alternative Education	2007
	Human Resources	2009
Minneapolis		
	Curriculum and Instruction	2004
	Finance	2004
	Federal Programs	2004
Newark		
	Curriculum and Instruction	2007
	Food Service	2008
New Orleans		
	Personnel	2001
	Transportation	2002
	Information Technology	2003
	Hurricane Damage Assessment	2005
	Curriculum and Instruction	2006

New York City		
, , , , , , , , , , , , , , , , , , ,	Special Education	2008
Norfolk		
	Testing and Assessment	2003
Philadelphia		2000
	Curriculum and Instruction	2003
	Federal Programs	2003
	Food Service	2003
	Facilities	2003
	Transportation	2003
	Human Resources	2004
	Budget	2008
	Human Resource	2009
	Special Education	2009
Pittsburgh		
8	Curriculum and Instruction	2005
	Technology	2006
	Finance	2006
	Special Education	2009
Providence	Special Education	2007
Tioriadiide	Business Operations	2001
	MIS and Technology	2001
	Personnel	2001
	Human Resources	2007
Richmond		2007
Ittellinona	Transportation	2003
	Curriculum and Instruction	2003
	Federal Programs	2003
	Special Education	2003
Rochester	Special Education	2005
Roenester	Finance and Technology	2003
	Transportation	2004
	Food Services	2004
	Special Education	2004
San Diego	Special Education	2000
Sun Diego	Finance	2006
	Food Service	2006
	Transportation	2000
	Procurement	2007
San Francisco	Tiocurement	2007
	Technology	2001
St. Louis	reemology	2001
St. LOUIS	Special Education	2003
	Special Education	2005

	Curriculum and Instruction	2004
	Federal Programs	2004
	Textbook Procurement	2004
	Human Resources	2005
Seattle		2002
	Human Resources	2008
	Budget and Finance	2008
	Information Technology	2008
	Bilingual Education	2008
	Transportation	2008
	Capital Projects	2008
	Maintenance and Operations	2008
	Procurement	2008
	Food Services	2008
Toledo		
	Curriculum and Instruction	2005
Washington, D.C.		
	Finance and Procurement	1998
	Personnel	1998
	Communications	1998
	Transportation	1998
	Facilities Management	1998
	Special Education	1998
	Legal and General Counsel	1998
	MIS and Technology	1998
	Curriculum and Instruction	2003
	Budget and Finance	2005
	Transportation	2005
	Curriculum and Instruction	2007
Wichita		
	Transportation	2009