# RICHLAND SCHOOL DISTRICT
# REVIEW OF SPECIAL EDUCATION SERVICES
# JUNE 2018


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# SECTION A: INTRODUCTION

In winter 2018, Richland School District (RSD) contracted with the Urban Special Education Leadership Collaborative (the Collaborative) at Education Development Center (EDC) to conduct a comprehensive review of programs and services offered by the school district to students with disabilities. The district asked for the review because they want to have information and recommendations to improve special education services. It is our hope that these observations and recommendations will enable the district to strategically move to the highest level of service when supporting their students with disabilities.[1]

*Richland School District*
Richland is located in the southeastern part of Washington State by the Yakima and Columbia Rivers. Richland is one of the Tri-Cities, which also includes Pasco and Kennewick. Richland School District enrolls approximately 13,500 students. Of those, 11.8% receive special education services under the Individuals with Disabilities Education Act (IDEA). The racial makeup of the student population in Richland is 72.1% White, 17.1% Hispanic, 4.3% two or more races, 3.7% Asian, 2.1% Black/African American, and 0.5% American Indian. Students receiving free or reduced lunch comprise 34.9% of the population.

*Urban Special Education Leadership Collaborative*
The Collaborative, which is housed at EDC, is a national network of 100 school districts committed to improving outcomes for students with disabilities and other culturally and linguistically diverse learners. In addition to over 20 years of experience in providing leadership development and networking opportunities to its membership of special and general education administrators, the Collaborative has organized and delivered technical assistance to more than 50 local education agencies and state departments of education. The Collaborative approaches its work as a "critical friend" by asking probing questions, examining data through multiple lenses, and offering concrete recommendations with a full appreciation of what is already in place and working well. The goal of this technical assistance work is to assist education agencies in their efforts to improve outcomes and opportunities for students with disabilities and other culturally and linguistically diverse learners.

The Collaborative's understanding of special education stems from IDEA, which states that special education services are to provide children with disabilities a "free and appropriate public education" in the "least restrictive environment" to prepare them for "further education, employment and independent living." In addition, IDEA "ensure(s) that the rights of children with disabilities and parents of such children are protected." Dr. Thomas Hehir, responsible for the most sweeping updates of IDEA in 1997 has stated, and we affirm, that special education is meant to minimize the impact of disability and maximize the opportunities for children with disabilities to participate in general education in their natural community (Hehir, 2005). Further, as the law is clear that students should remain in the educational environment they would be in if they did not have a disability and removal from this environment must be justified, we work with the assumption that "special education is a service, not a place." In response to the school district's request for a program and service delivery review, the Collaborative organized a team of experienced educational leaders to identify organizational, programmatic, policy, procedural, resource allocation, and service delivery

[1] For a list and description of Collaborative team members, see Appendix A.

improvements that the district might implement to enhance student outcomes, address gaps in achievement for students with disabilities, and conform to standards of contemporary best practice.

*Methodology*

In order to conduct this study, we collected district, state, and national data; examined district documentation; interviewed approximately 75 central office and school level staff and families; and visited 10 schools.[2] We also communicated with staff and families via email. We collected and analyzed our data during the Spring of 2018. While our interviews and focus groups occurred during this time, the quantitative data we collected represented the 2016-2017 school year. As such, the data represented a snapshot of special education at that time.

*Organization of Report*

We have organized this report to move from general education to special education as it is our belief that because special education is a service, the stronger the district's general education practices, the stronger the district's special education practices. We want those reading this report to focus first on general education. Further, districts are required to support all students in meeting their academic standards and in building systems of tiered support. The first tier lays the foundation for the second and third tiers and, therefore, must not only be strong but purposeful in including students with disabilities.

*Acknowledgements*

The Collaborative Team recognizes the contributions of Mandy Cathey, Executive Director of Special Education and all of the staff and families in Richland. All of Richland staff we spoke with were open to this study. They were engaged and provided much of the information on which this report is based. Many seemed encouraged that this review could improve outcomes for students with disabilities. The families we spoke to were extremely passionate and concerned, and cared not only about their own children, but about Richland School District.

[2] For a list of interviewee roles, see Appendix B.

# SECTION B: OVERARCHING STRENGTHS

***Overarching Strength 1. The district has a wealth of knowledge, community backing, and a supportive School Board that is dedicated to making special education services the most effective they can be for their students.***

Based on the conversations we had with staff and the documents we reviewed, it was evident that the district has a wealth of knowledge on how to focus instruction to meet the needs of a variety of students. The Central Office Team shared their ideas to continue to build systemic practices throughout the district to support student learning for all students. Specifically, the School Board is supportive of the work the district is doing to improve the outcomes for students with disabilities to ensure they receive a quality education. Some Board members had even taken classes in special education and have interned in classrooms serving students with disabilities so they could better understand how to best support this population of students. Families we met with provided critical feedback, and it was clear they wanted to partner with the district to ensure these supports were in place to support all students.

***Overarching Strength 2. The district has placed a strong emphasis on closing the achievement gap between students living in poverty and those in higher socioeconomic (SES) ranges by creating school improvement plans and professional development that address core academics, suspension rates, attendance, and graduation rates for all students.***

There is a clear focus across the district to close the achievement gap for students in poverty. This work has been aligned with school improvement plans and professional development that is provided to all staff across the district. Based on this work, the district uses their school improvement plans and data, unique to each school, to consistently monitor the achievement gap in real time and make adjustments to practice. All building leaders understood how school improvement plans should be used to drive instruction and develop interventions to support all students. We commend this work as the district has made sure to align all areas to keep the focus consistent.

***Overarching Strength 3. The district employs staff that are highly qualified and who work diligently to provide the best education to their students.***

Staff we interviewed were eager to learn and wanted to make sure they were focused on improving their practice to help students work towards their full potential. The district does not have challenges hiring and retaining qualified staff, and there was evidence that the district is supporting administrators and leaders in the work they do at the building level.

***Overarching Strength 4. The district takes seriously issues raised in audits and citizen complaints and responds swiftly to concerns.***

Based on our interviews, the district used the recent citizen complaints to inform their practice and make changes with their current special education programs. The district's work went beyond simply answering a complaint but working collaboratively across departments to make sure students were getting the support they needed. This was done through hiring effective Central Office staff that believed in the new vision the district was taking to create specially designed instruction separate from

the district's Response to Intervention (RTI) models. Staff we spoke to were supportive of this shift and wanted to work together to understand how to best implement supports and services that meet the needs of all students and would allow students to make necessary gains in their education.

# SECTION C: OBSERVATIONS & RECOMMENDATIONS – RICHLAND SCHOOL DISTRICT

***Observation 1: Income-Based Achievement Gap***

> ***Richland School District's goal is to "expand learning for all while reducing the income-based achievement gap," addressing the gap between students with low SES and those with high SES. This gap is exacerbated when disability status is factored into the data.***

Richland School District (RSD) has targeted its efforts on reducing the income-based achievement gap. When disaggregating district data by income and disability status, it is clear that for students who are low-income (as defined by subsidized lunch) and classified with a disability, the gap is exacerbated. For example, as shown in Exhibit 1, math and ELA scores on the Smarter Balanced assessment are lowest for low-income students with disabilities, with less than 15% receiving proficient math and ELA scores.

Another indicator of this can be seen with suspensions. As shown in Exhibit 2, when examining high school suspensions (more suspension data are examined in Observation 15), it is clear that, in general, high schoolers with a disability are suspended more often (15%) than high schoolers without a disability (4%). However, when examining high schoolers with a disability receiving subsidized lunch, it is clear that they have higher suspension rates (18%) than those with a disability not receiving subsidized lunch (13%).

**Exhibit 1. Percentage of students scoring proficient or above, subsidized lunch and disability**

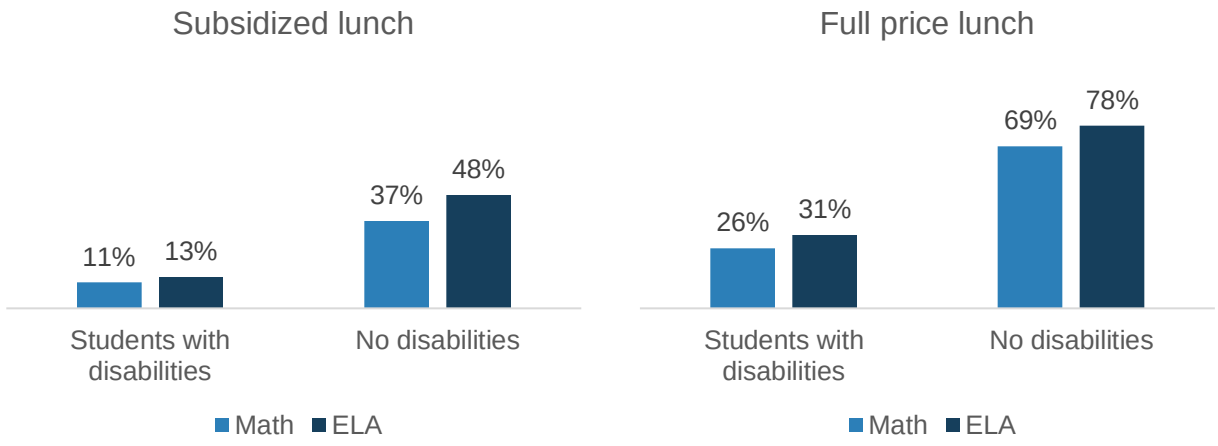
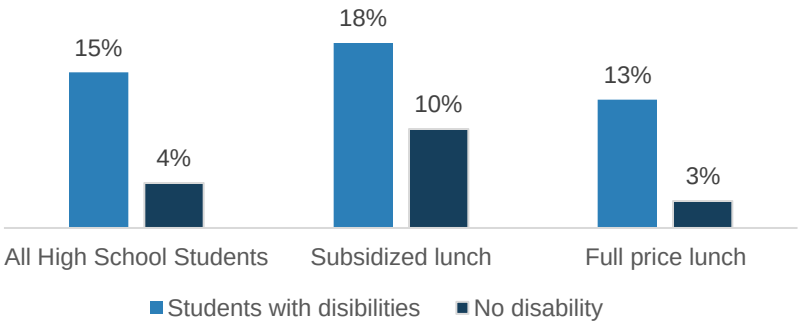


**Exhibit 2. Suspension among high school students with disabilities, by subsidized lunch status**




*Recommendation 1: Align the focus of RSD's Special Education to the overarching vision of reducing the income-based achievement gap, providing focus and targets disaggregated by disability status.*

The district has a focus of reducing the income-based achievement gap, a gap that is exacerbated when data are further disaggregated by disability status. It is our recommendation that data used at the district and school levels to help focus on the district vision be disaggregated by disability status in order to highlight the wider achievement gaps and to focus staff on the need to support the education of students with disabilities.

***Observation 2: Response to Intervention***

***The district has historically placed a strong emphasis on Response to Intervention (RTI). However, the RTI process is unclear to many in the district; implementation is inconsistent among schools; and the model has morphed into what might be considered a traditional categorical model of special education with Tier 3 essentially synonymous with special education.***

In our discussions, it was clear that the district uses an RTI model to support all students. The RTI model was implemented over the last 5–7 years when the previous special education director was in place. It seemed the district was implementing this model as a way to support inclusion practices across the district for students with and without disabilities. However, based on our discussions and focus group, it was clear that the RTI model came at the expense of developing specially designed instruction for students with individual education plans (IEPs). This eventually led to a citizen complaint as both staff and family noted IEPs were not being implemented with fidelity. In response to this complaint, the district has been working to develop a more comprehensive special education model that would provide a full continuum of supports. In creating this new continuum, the district has struggled to shift the culture from an RTI focus for students in special education to a model focused on developing specially designed instruction individual to student needs. The new Central Office leaders, including the Deputy Superintendent and Interim Special Education Executive Director, are working hard to shift the focus and help staff understand that RTI and specially designed instruction are two separate concepts, even though both models were developed to support students, albeit in different ways. This has been a significant shift for building administration, general education, and special education staff as they have been working hard to shift practices that have been in place for many years throughout the district.

As part of the existing RTI model, the district has Student Assistance Teams (SAT) in place to discuss students of concern that may require Tier 2 and Tier 3 interventions prior to considering special education services. These teams are supposed to meet regularly at the building level to discuss specific students, develop interventions, and monitor progress for students they have identified. Based on our discussions, these teams are not meeting with fidelity across the district. Some staff reported not having access to Tier 2 and Tier 3 interventions or not knowing how these interventions should be implemented. Some schools appeared to use Tier 3 interventions as special education services. When we discussed this with Central Office teams, they felt they supplied all buildings with several intervention tools and were confused why staff at the building level did not report they had access to these materials. Central Office teams had several lists of interventions and curricula they had invested in to support staff at the building level for tiered interventions and special education. However, after a review of the documents the district had created for math and reading interventions, we noticed the matrices that had been created by Central Office for ELA and math curricula were outdated or did not fully align with what was currently available. The math matrix was developed in 2010, and the reading matrix was developed in 2013. This did not appear consistent with what Central Office teams said was available to buildings. It was our understanding that over the past few years, the district had adopted new curricula in math and ELA that were rolled out to the district; however, the documents we were given for review did not reflect these changes.

Given the information provided during focus groups and our document review, the district does not have a consistent practice or documentation to drive the SAT process. This was largely based on discussions with staff, many of whom did not know what interventions were available to them, both academic and behavioral, and some reporting they did not participate in the SAT process. This was especially relevant for Tier 2 and Tier 3 interventions. Additionally, some staff appeared to believe the SAT process was the paper trail needed to have a student evaluated, when the opposite is true. When implemented appropriately, the SAT process should decrease referrals as tiered interventions support the large majority of students prior to referring them for a special education evaluation. Furthermore, when a student has been identified as having a disability and requires specially designed instruction, RTI should not be the only model considered when developing the IEP and identifying special education services. We also found that the district did not have a student intervention monitoring system to collect information on the interventions and strategies used to move students to higher levels of learning. Without a systematic way to share information between teachers and families, students are unable to receive customized support to demonstrate progress over time.

> *Recommendation 2: The district should consider a revision of the current RTI model that could include rebranding to a multi-tiered system of supports (MTSS) framework that employs universal design for learning, provides all students with a meaningful opportunity to learn and options for progress monitoring, and is a problem-solving process that helps match instructional resources and focus to educational needs.*

Multi-tiered system of supports (MTSS) is a relatively new term for what we know to be good teaching. MTSS has incorporated the idea that the more complex the learner is, the more intensive support they need, both in academics and in the social-emotional realm. MTSS says all students must have high-quality core instruction (Tier 1). There will be a small group of students who need more support, and they might receive skill building in a small group to meet grade-level standards (Tier 2).

After high-quality instructional and supplemental supports have been tried, there will be a smaller group of students who need even more intensive supplemental supports (Tier 3). These multi-tiered supports should be offered to all students for all academic subjects and social-emotional supports.

The beneficial use an MTSS [3] framework is that it draws from the strong research base that highlights both Response to Intervention (RTI) and positive behavior interventions and supports (PBIS). An MTSS framework implemented with fidelity integrates assessment and intervention in a schoolwide, multi-tiered prevention system to "maximize student achievement and reduce problem behaviors."[4]

The MTSS framework relies on high-quality general education instruction, which is aligned to the standards, whether they are Common Core State Standards (CCSS) or the Washington State Learning Standards, and it is differentiated to provide all students with a meaningful opportunity to learn. MTSS builds on the standards to provide a framework and a set of critical interventions and additional time to support teaching and learning at differing levels of intensity, depending on the needs of the student. In this way, the standards articulate the "what" in teaching, and MTSS provides a framework for "how and when" [5] to provide it. As described by the Council of the Great City Schools:[6]

> *In short, MTSS employs a problem-solving process that helps match instructional resources and focus to educational needs; makes the instructional adjustments necessary for continued improvement in both student academic performance and students' rate of progress; and assesses the effectiveness of instruction/interventions on student outcomes. MTSS is also designed to be preventive in nature because it uses a variety of early warning signs to ensure educators can work to accelerate student progress before it is too late. Furthermore, MTSS provides an earlier and more appropriate identification of students who are not on track academically and allows differentiated instruction and intervention as soon as a need is identified. So, students do not have to exhibit significant academic failure or behavioral difficulties before they receive support.*

Districts use the MTSS framework to ensure (1) the development of core curriculum and tiered supports for all students; (2) that students identified as needing special education services have ample opportunities to receive evidence-based instruction and interventions in reading, math, and social-emotional supports; and (3) their disability identification (as needing special education services) is not based on a lack of such opportunities. In this way, districts are also better able to mitigate any disproportionality in racial/ethnic disability identifications due to lack of instruction. This model

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[3] Commonly, the term multi-tiered system of supports (MTSS) is used to refer to a framework that supports academic achievement and positive behavior; the term is used in the federal Elementary and Secondary Education Act.

[4] Office of Superintendent of Public Instruction. (n.d.) Response to Intervention. Retrieved from http://www.k12.wa.us/RTI/default.aspx

[5] This reference to when to provide MTSS is not to be confused with any timing specified in school or district pacing guides, which provide information on "when" to teach a concept or skill. See Gamm, S., Elliott, J., Halbert, J. W., Price-baugh, R., Hall, R, Walston, D., Casserly, M. (2012). Common Core State Standards and diverse urban students: Using multi-tiered systems of support. Washington, DC: Council of the Great City Schools.

[6] Gamm, S., Elliott, J., Halbert, J. W., Price-Baugh, R., Hall, R, Walston, D., Casserly, M. (2012). Common Core State Standards and diverse urban students: Using multi-tiered systems of support. Washington, DC: Council of the Great City Schools. Retrieved from http://www.cgcs.org/cms/lib/DC00001581/Centricity/Domain/87/77--Achievement%20Task%20Force--RTI%20White%20Paper-Final.pdf

would be especially relevant to the work in Richland, which is focused on closing the achievement gap for students in poverty and ensuring this subgroup of students is not over-identified for special education services. Research also shows that the use of MTSS to support intensive interventions for all students leads to higher achievement for students with IEPs.[7]

When teaching and learning in general education is culturally competent[8], based on Universal Design for Learning (UDL)[9], and supports diverse learners, achievement for all students should increase and the special education identification process should be more effective and free from unintended bias. The process of developing a systemwide MTSS creates a shared sense of urgency among all stakeholders to improve educational outcomes for all students and articulate an accountability system for results.

Washington State has adopted the Washington State Multi-tiered System of Supports (MTSS), described as, "an action framework that structures service delivery to assist staff and students to create a culture for learning." Exhibit 3 shows a visual representation of Washington's MTSS model[10]. As shown, Tier 1 focuses on all students, Tier 2 focuses on some students, and Tier 3 focuses on a small number of students.

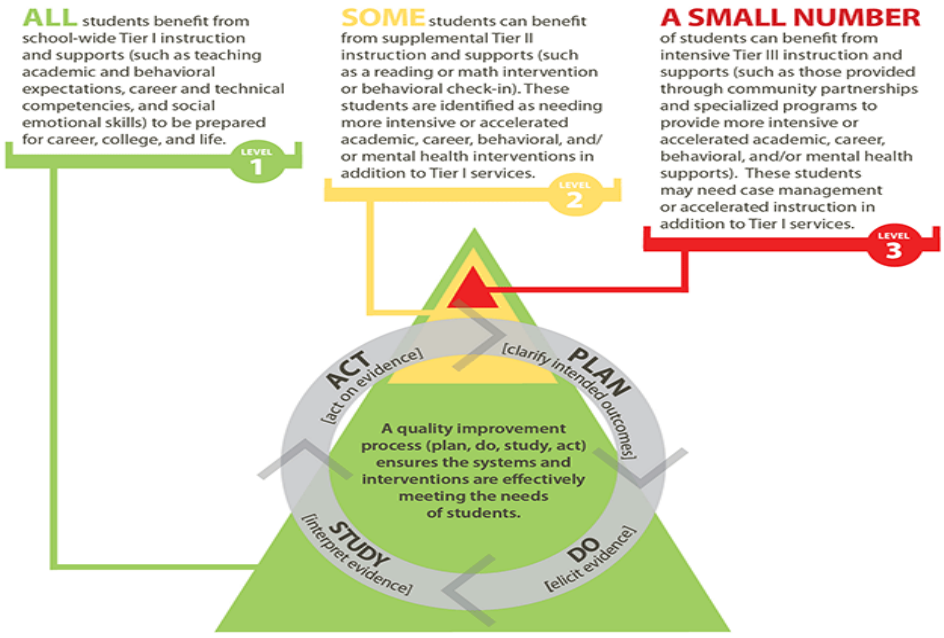
[7] See, for example, research published by the RTI Action Network, retrieved at http://www.rtinetwork.org/learn/research, and by the Center on Response to Intervention at American Institutes for Research, retrieved at http://www.rti4success.org/search?keywords=research

[8] "Cultural competence enables educators to work effectively across cultures their students represent. Competence in school settings is a process based on a clearly defined set of core values and principles that support policies, practices, behaviors, attitudes, and structures that enable educators to work effectively across the cultures their students represent. The system must develop the capacity not only to value diversity, but to manage the dynamics of diversity. A second element of cultural competence is to acquire and institutionalize cultural knowledge and adapt to diversity in the contexts of the communities being served." Elam, D., Robinson, S., & McCloud, B. (n.d.). New directions for culturally competent school leaders: Practice and policy considerations. Tampa, FL: University of South Florida, College of Education, David C. Anchin Center. Retrieved from http://anchin.coedu.usf.edu/publication/policybrief/PolicyBrief_Issue_1-1.pdf

[9] CAST. (n.d.) About Our Work. Retrieved from http://www.cast.org/our-work/about-udl.html#.VrFHz1KrbUk

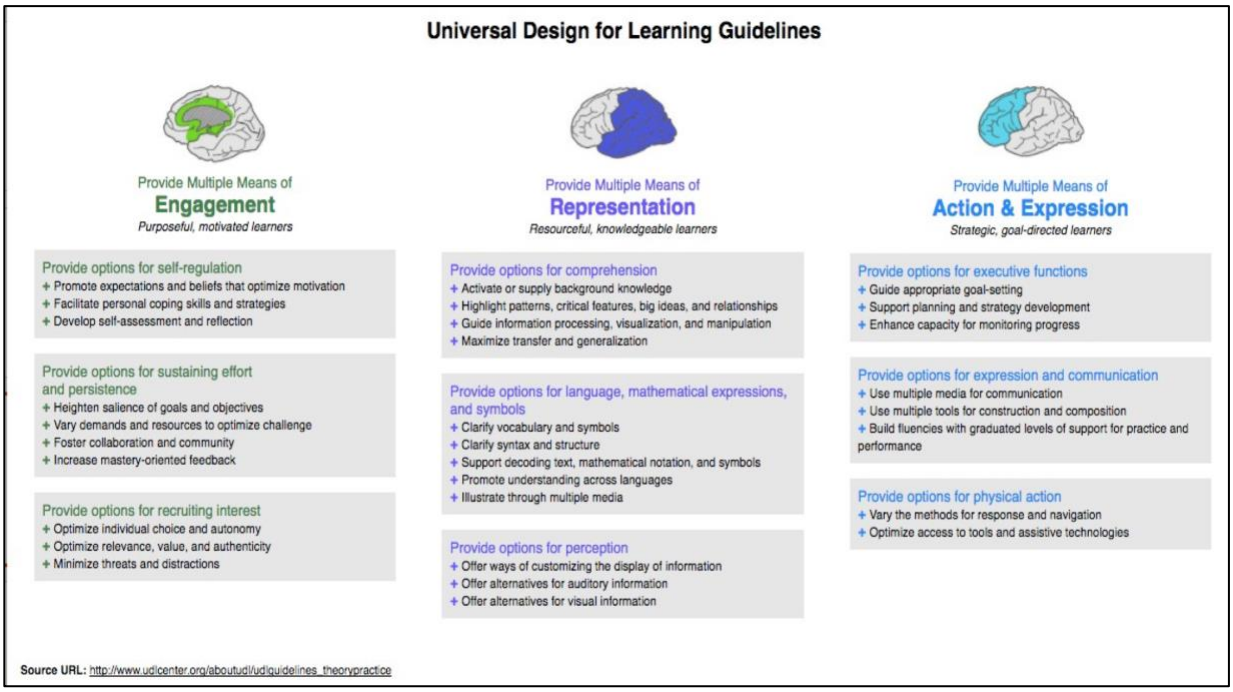
[10] Washington State Office of Superintendent of Instruction. (n.d.). Multi-Tiered System of Supports. Retrieved from http://www.k12.wa.us/MTSS/pubdocs/MTSSgraphic.pdf

**Exhibit 3. Visual representation of Washington State's MTSS model**




It is also important to understand that Tier 1 instruction should be based on the principles of UDL. As shown in Exhibit 4, UDL is a framework that can be used to develop high-quality, flexible learning environments that address the needs of all students and help all students achieve high standards. UDL helps educators by suggesting flexible goals, methods, materials, and assessments that empower them to address student variability while maintaining high-achievement standards for all students through multiple means of representation, action and expression, and engagement. Exhibit 4 shows a visual representation of the UDL framework.

**Exhibit 4. Universal Design for Learning guidelines**




We want to be clear that UDL is not a special education initiative, but is an instructional framework. We strongly recommend that general and special education teachers base their instructional practices on the UDL framework so that instruction is designed to meet the needs of ALL learners. We recommend that UDL be an integral part of the districtwide MTSS plan. This should be separate from special education supports and services. In previous years and under previous leadership, special education and MTSS were intertwined, and while both of these initiatives work in tandem, special education consists of specially designed instruction for students with identified disabilities and whose disability directly impacts their progress in the educational setting. In comparison, MTSS is for ALL students and should be used to support struggling learners, whether they are students with or without disabilities.

We recommend the district create a strong MTSS model with a focus on establishing capacity to support all learners. This should include a consistent written structure and protocol to guide implementation of a comprehensive MTSS model for improved academic achievement and positive behavioral supports. As this is a general education initiative, we suggest the Office of Special Programs and the Office of Teaching, Learning and Curriculum develop a team to manage the development process. We also suggest the district develop a task force of Central Office leaders, building administration, general education teachers, special education teachers, and school psychologist and counselors to collaborate across departments to develop a consistent MTSS process with documentation procedures that can be implemented districtwide. This will allow for valuable feedback and discussion around the current process and how all stakeholders believe it can be adapted to support their work at the building level. The reason we recommend a "task force" approach is because of the current belief that special education and MTSS are one and the same. Without having building leaders and staff at the table to develop this process, we believe this mindset will continue

and building-based staff will not fully understand how to separate MTSS and specially designed instruction for students with IEPs.

We recommend the revised MTSS framework be consistent across all schools and use the same name and documentation to track student progress. Some schools refer to this process as SAT, Academic Support Team (AST), and Building Support Team (BST), among others. A common language should be adopted by the district to create consistency across all schools for the MTSS model. A review of documents showed there were a few schools in the district whose documents could be used as a model in creating a consistent documentation process districtwide. Some of the staff we interviewed were unsure what tiered interventions were and the variety of options available to them. To support this work, one school, White Bluffs, used a checklist for tiered interventions, which could be beneficial for all schools to guide their work. We recommend the district look at the documentation districtwide and determine which documents most align with the district's vision for SAT and use these documents across all schools. We also suggest the MTSS plan include both academic and social-emotional instruction that (1) is inclusive of all grade levels and students of all abilities, including students with disabilities, and (2) addresses culturally appropriate instruction. As part of this process, refer to the Center on Response to Intervention, Response to Intervention – *Guide for New York State School Districts*[11], as well as other states and districts leading this effort.

Finally, we recommend an assessment of staffing needs related to MTSS and a plan to provide professional development to support staff during implementation.

***Observation 3: Collaboration***

> ***The district has several teams that collaborate around various initiatives; however, there is not a clear structure for the development and implementation of cohesive and collaborative leadership teams that support the development of all students in the district. Such a team would include leaders in special education, English language learners, teaching and learning, as well as Assistant Superintendents.***

During our interviews, it was evident the district has various initiatives in place to support the work the district is doing. One of the biggest initiatives the district has focused on is closing the achievement gap for students in poverty. The district has developed rich professional development from William Parrett and Kathleen Budge around this topic. Specifically, the district is studying and implementing the strategies outlined in the book *Turning High Poverty Schools into High Performing Schools* (Parrett & Budge, 2012). This book specifically focuses on three key areas of performance: (1) building leadership capacity; (2) fostering a safe, healthy, supportive, learning environment; and (3) focusing on student, professional, and system learning.[12] This work has been the focus across all schools in the district and the focus of each school's improvement plan. During our focus groups, it was clear that Central Office Leaders and building administrators were aware of this initiative and collecting data around the efforts each building was making to close the achievement gap for students in poverty.

[11] See link for resource guide http://www.p12.nysed.gov/specialed/RTI/guidance-oct10.pdf

[12] http://www.ascd.org/Publications/Books/Overview/Turning-High-Poverty-Schools-into-High-Performing-Schools.aspx)

However, when we talked to focus groups about curricula across the district, we found a gap between the efforts of the Special Education program, the Teaching, Learning, and Curriculum (TLC) Department, and the Title/Learning Assistance Program (LAP). Most of these teams agreed that work needed to be done around developing collaborative practices as these teams had become used to working in silos under the previous Executive Director of Special Education. We were informed the district had implemented a six-year curriculum adoption cycle. However, with regards to special education, consensus around curriculum and supports available to staff at the building level, including training for special education staff, to provide specially designed instruction, was not apparent. The TLC Team had worked with special education teachers in the past to gather information about what materials/curricula they needed and ordered these materials based on their feedback. But when we inquired with other focus groups about what they believed was available to special education teachers, they were unable to answer that question with consistency. We did learn that the current Interim Executive Director of Special Education was working with the TLC Team to ensure special education teachers are represented on the committees for curriculum adoption, but this was a new practice for the district.

Based on our conversations, it did seem collaborative practices across these three departments (Special Education, TLC and LAP) was starting to take shape, but they were in the beginning stages. We did note that Central Office teams seemed optimistic that the Interim Executive Director of Special Education was open to and encouraging of this collaborative work, which they did not feel was apparent under previous leadership.

> *Recommendation 3: Develop collaborative structures across departments to support districtwide initiatives and develop supportive processes at the building level that might include co-facilitating professional learning and conducting instructional rounds.*

Collaborative structures are critical to building a strong Central Office Team. The Central Office should be organized in a way that will improve the work in schools. As discussed previously, during observations, interviews, and focus groups, we noted a lack of collaborative structures between the Central Office team and schools. Or if collaborative structures existed, they were not being used in an effective manner to implement the change the district wanted to see. Following are two strategies implemented by highly supportive and collaborative school districts:

- Organize the Central Office—including special education, human resources, finance, curriculum, and instruction—to function cohesively to support principals and school leadership teams. The district should restructure or hire a staff that fits the needs of the schools' strategic plans, assists principals in removing ineffective teachers, and either through Central Office staff or consultants, provides technical expertise to schools in implementing their own strategic improvement plans.
- Establish a collaborative presence in schools including all departments focused on providing instruction that is focused on building the capacity of principals and teachers to

own school problems and to implement proven solutions.[13] This is discussed in more detail below.

Research from the Southern Regional Education Board's (SREB)[14] noted the importance of improving schools through district vision, district and state support, and principal leadership as one example for how the district can accomplish this work. We describe this here as one suggested path the district could take. The SREB authors outlined seven strategies that districts can implement to help improve student achievement and the learning environment. While the SREB authors focused mainly on middle and high schools, the same concepts can be applied to all schools to keep them moving ahead on the road to continuous improvement. Part of the improvement process includes special education, as special education is only as good as general education, and therefore, collaborative partnerships are critical when implementing strategic plans. The seven strategies Richland School District could consider when creating collaborative structures at central office level are quoted below:

- *Strategy 1: Establish a clear focus and a strategic framework of core beliefs, effective practices, and goals for improving student achievement.* Highly supportive districts provide principals with a focused mission and vision of key beliefs and practices to guide school improvement. This can be a short mission statement, such as "Striving for excellence—no exceptions, no excuses." Or it can be a living framework collectively developed and adopted by district staff in collaboration with community members over a period of time and continuously monitored and revised by an active School Board. This work has been started in the district with the work around closing the achievement gap for students in poverty. The district has done an excellent job aligning professional development to this initiative. Furthermore, the district has spent a considerable amount of time supporting each school in developing a school improvement plan and having it available online for each school. As part of these plans, Central Office and building leaders are continually monitoring their student data and progress toward closing the achievement gap for students struggling and, specifically, for students in poverty.
- *Strategy 2: Organize and engage the School Board and Central Office in support of each school.* In highly supportive districts, the School Board continuously focuses on improving student achievement, and Central Office personnel spend the majority of their time in the schools, working with principals and teachers to create cultures of success uniquely suited to the students' needs and the faculty's strengths. Principals are given the authority to make hiring and firing decisions for their schools and are expected to be (and supported as) instructional leaders. Central office staff were not present in schools to the extent that school staff wished. Some staff reported they had asked for guidance or support but did not receive a response from Central Office teams. Central Office staff reported they did not want to overstep their roles but would like to develop stronger partnerships with building leaders to support their work on the ground. Staff felt they needed more support and resources around classroom management, curriculum, collaboration with teachers, and the consultation model for special education. This is important feedback that the Central Office staff can use to guide their work in support of

[13] Southern Regional Education Board. (August 2010). The three essentials: Improving schools requires district vision, district and state support, and principal leadership. Retrieved from http://www.wallacefoundation.org/knowledge-center/Documents/Three-Essentials-to-Improving-Schools.pdf

[14] https://www.sreb.org/publications-2?page=1

each other when developing their strategic plan and establishing a collaborative presence in schools.

- *Strategy 3: Provide instructional coherence and support.* Highly supportive district leaders understand the challenging work principals must do and, in many cases, have been successful principals themselves. These leaders support the principals' focus on instruction and model that priority by focusing on curriculum and instruction in School Board and superintendent meetings. They routinely engage school and teacher leaders in developing and using tools such as walk-throughs; professional learning communities (PLC); and proven, research-based instructional practices. Based on this feedback, we recommend Richland develop a classroom walk-through protocol that allows all staff to observe instructional practices and support school leaders on the ground in targeted areas identified in need of additional support. This should include organizational structures that support schoolwide planning, teaching, and instructional decision-making to meet individual needs of students.
- *Strategy 4: Invest heavily in instruction-related professional learning for principals, teacher-leaders, and district staff.* Highly supportive districts give principals the tools to be effective instructional leaders and continuous learners. These districts set aside time for collective learning and instruction-focused professional development and provide beginning principals with induction and mentoring to increase their chances of success as effective instructional leaders. During observations, focus groups, and interviews, we noticed some schools had strong instructional practices in place, and other schools appeared to require additional support in developing lessons that were rigorous and engaging. This was evidenced across settings in both inclusive classrooms and during small group, pull-out instruction. We also received feedback that teachers in low-incidence classrooms felt they were lacking the curriculum and resources they needed to develop strong lesson plans. Many felt they had to develop their own curriculum because they were missing parts; the curriculum was not engaging or relevant to their students; or they did not fully know how to use the curriculum. This is why it is critical for Central Office staff to develop structures that allow them to provide support at the building level and observe classes and programs to gain an understanding of areas that require more collaboration and support in implementing effective instructional practices.
- *Strategy 5: Provide high-quality data that link student achievement to school and classroom practices and assist schools to use data effectively.* Highly supportive districts have adopted strategies to help principals disaggregate, analyze, and interpret their student achievement data quickly to discern student deficits and identify weaknesses in school and classroom practices. During our interviews and focus groups, we noted the district does an excellent job collecting and analyzing data through their school improvement plans. We also noticed during school observations that the rigor between schools throughout the district varied widely. Some classrooms had well-developed lesson plans, with students engaged in their learning, while other teachers appeared to struggle with classroom management or developing lessons aligned to standards to make student learning meaningful. Regular school walk-throughs and PLCs allow building leaders to coach their teachers to create strong instructional practices across all classes, both general and special education. We encourage Central Office staff to participate in these walk-throughs and support principals in becoming instructional leaders. This is not meant to be a punitive model, but a strategic model to mentor teachers and provide coaching from both building leaders and coaches from the TLC team. This may help clearly define the role for the coaches from the TLC team, who we were told only support teachers when a teacher

requests their support. Otherwise, coaches cannot provide feedback around instructional practices even if they feel the teacher would benefit from their support and mentoring. The district should work to encourage practices where teachers, building administrators, coaches, and Central Office staff can visit classrooms at any time, without being invited, to build on strong instructional practices and culture.

- *Strategy 6: Optimize the use of resources to improve student learning.* Highly supportive districts provide principals with resources—human and financial—and the flexibility to use those resources to address unique school needs while remaining consistent with school and district improvement frameworks and strategic plans. Schools with greater needs receive greater resources and assistance in assessing which school and classroom practices are working and eliminating ineffective practices. These schools also are supported by outside coaches and facilitators who are skilled in assisting the school and teacher-leaders to address how low-income and minority students are being taught and how instruction must change if achievement gaps are to be closed. As noted previously, there was significant variability in the level of rigor observed in the schools throughout the district. We recommend that Central Office teams closely examine instructional practices in each school to ensure all students are receiving the supports they need, both in special education and through the MTSS model. If there are discrepancies between schools, we recommend the district work to ensure strong instructional practices and supports are implemented in all schools and tailored to the needs of each school and their student populations.
- *Strategy 7: Use open, credible processes to involve key school and community leaders in shaping a vision for improving schools.* Highly supportive districts engage the whole community in setting a common vision for student learning. They seek principals' and teacher-leaders' ideas on major decisions about district policies, changes in curriculum and instructional improvements, use of professional development resources, and the district's budget. They encourage principals to use leadership teams to lead their schools and to engage the school community in setting a vision and creating a school improvement plan. It was noted in our focus groups that Richland has done an excellent job providing professional development to support schools in closing the achievement gap for students in poverty. They also have developed committees to support curriculum adoption that include a variety of stakeholders to provide feedback. However, it would be helpful to have the district craft a strategic plan that all Central Office departments assist in developing. We were told the new Superintendent would be tasked with creating a strategic plan when she takes over next year so the district has a plan to ensure this work begins.

***Observation 4: Budget***

***The district's expenses for special education have seen a significant increase over the last five years and the budgeting process for special education appears to allow for spending in areas that may not correlate to an increase in student achievement, specifically in the hiring of paraprofessionals.***

Richland School District currently does not have a standardized funding formula as it relates to the provision of special education supports and services. Without such a process, it is difficult to decide on appropriate staffing and the purchase of effective supplemental supports and supplies needed to provide special education services. Without strong guidance, the district currently spends an excessive amount of their budget on paraprofessionals and limited funds on effective supplemental supports.

*Recommendation 4: Consider implementing a funding formula and processes that support a tiered approach to accessing the general education curriculum and specially designed instruction and that standardize special education budget allocations, including the use of appropriate staff.*

Richland School District should consider a move to a systemwide approach to determining needs, establishing effective resources, and allocating funds for curriculum purchases, possibly implementing a funding formula (e.g., weighted student rates). Funds allocated for staff should be used to hire highly qualified educators to work in the areas of most need, including licensed professionals supporting social, emotional, and mental health growth (e.g., social workers, school adjustment counselors). For paraprofessionals, there should be limits on hiring to those working with classrooms and processes in place to assure paraeducators work as an extension of the teacher, rather than as a lead educator.

***Observation 5: Contract***

***The Richland Education Association (REA) contract impedes the ability of the district to provide professional development and encourages the use of paraeducators and overload pay for working with students.***

As stated in the finding, the REA contract puts parameters on professional development, an area in need of growth in the district. Further, the contract encourages the use of paraeducators, a practice we will discuss later in the report as remarkably larger than mandated or appropriate. Finally, the REA contract has the potential to incentivize overload pay for working with students.

*Recommendation 5: Examine in detail all contractual language for areas to address professional development and the use of paraeducators with the Richland Education Association.*

We examined the REA contract, searching for areas that might affect the provision of special education services. We provided suggestions to the district leadership on where to question and/or address the contents of the contract with the goal of providing the most effective special education supports and services for students with disabilities in Richland.

# SECTION D: OBSERVATIONS & RECOMMENDATIONS – RICHLAND SPECIAL EDUCATION

***Observation 6: Student Demographics***

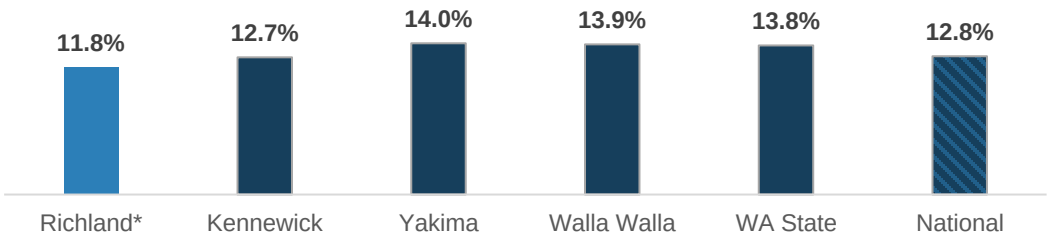
***Classification rates and decisions concerning educational environment need to be examined and tracked.***

In this observation, we provide demographic information pertaining to classification rates and educational environment of students with disabilities who receive special education services. Classification data are summarized and compared to the state and nation as they relate to overall percentages of students with disabilities and disaggregated by disability classification, SES, age group, and race. We examine students' educational placements, or the amount of time students with disabilities are educated in general education classes alongside their peers without disabilities. These data are summarized and compared to the state and nation and disaggregated by disability categories and race.

*Classification Rates*

According to state data from the OSPI Washington State Report Card, students with disabilities comprise approximately 12% of all students in Richland School District. This is commensurate with the national percentage of 12.8% students with disabilities. District data varies slightly from the state-reported numbers (state numbers are 11.8% while student-level data sent from the school's records shows a slightly higher 12.2%), and this difference is most likely attributable to revisions made to the district data after the numbers were reported to the state. Richland has a lower number of students with disabilities than surrounding districts, and the district is also lower than the state average of 13.8%, as indicated in Exhibit 5 below.

**Exhibit 5. Students with disabilities at Richland and surrounding districts, and at the state and national level**

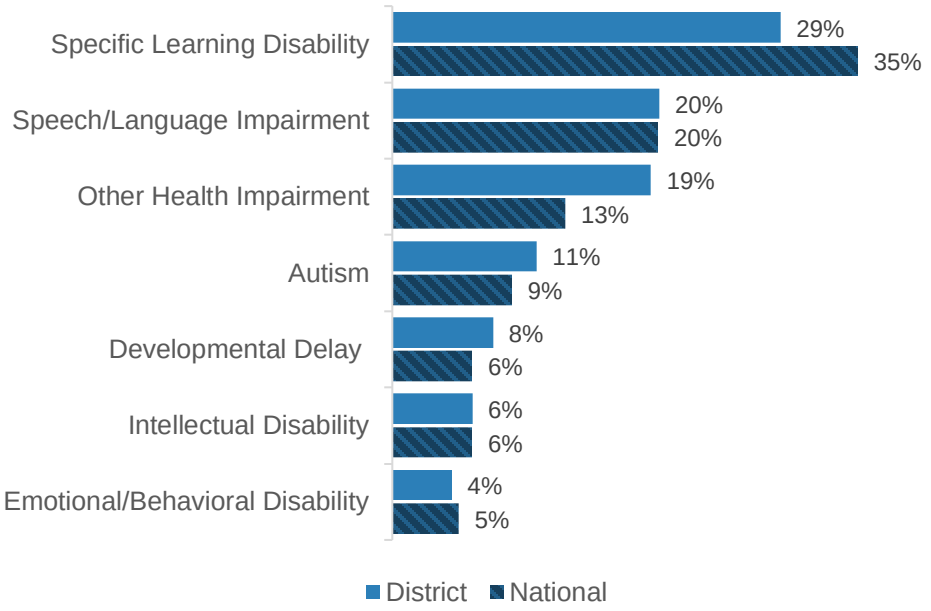



** Student-level data from the Richland school district database varies slightly from the stats on the OSPI WA State Report Card. The data represented in this table for schools in Washington State all come from the State Report Card.*

When disaggregated by disability type, as shown in Exhibit 6, RSD classifies students with speech and language impairments (20%) and intellectual disabilities (6%) at the same rate as the nation. The district classifies students with specific learning disabilities at a lower rate than the nation (29% vs. 35%) and students with other health impairments (19% vs. 13%), autism (11% vs. 9%), and developmental delays (8% vs. 6%) at higher rates than the nation. While there is no one reason, an

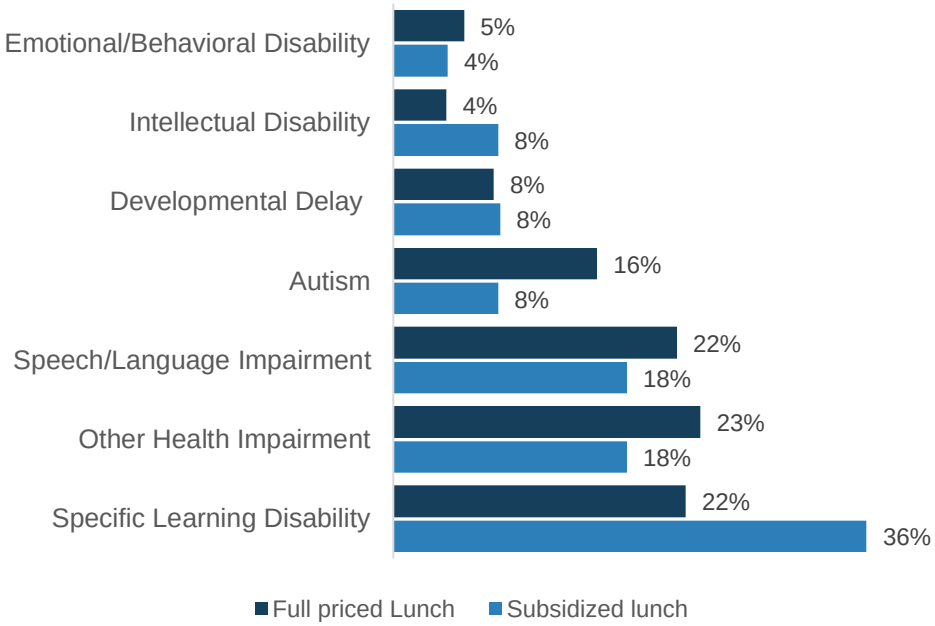
explanation for the difference in students classified with specific learning disabilities and those classified with other health impairments is that specific learning disabilities and ADHD often coexist. Another explanation could be found in a lack of clarity in definition and criteria.

**Exhibit 6. Percentage distribution of children and youth ages 3–21 served under the Individuals with Disabilities Education Act (IDEA), Part B, by disability type: School year 2014–15**



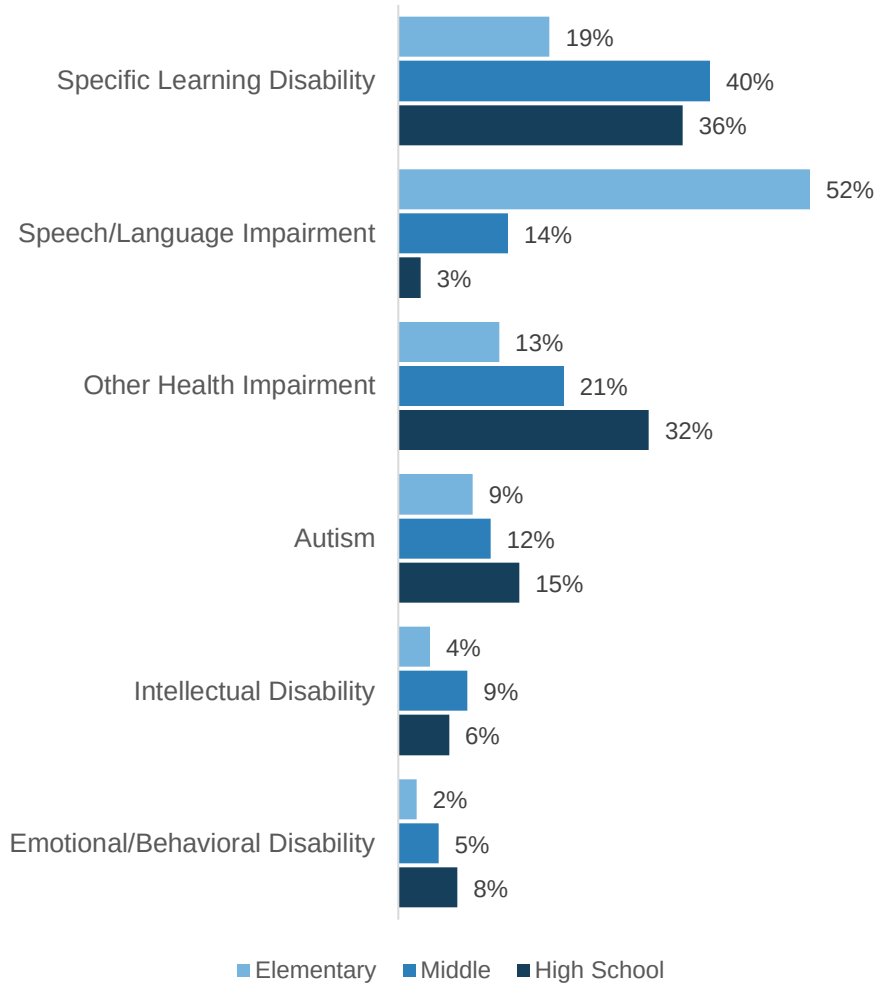

Further disaggregating the district data by poverty, in Exhibit 7 we see a disproportionate number of students below the poverty line classified with developmental delays and learning disabilities, and among students above the poverty line, we see more students classified with autism and other health impairments. While poverty is known to have a small effect on disability, the differences are minimal and should be found across the spectrum of disability classifications. Poverty does not, for example, have more effect on whether a student has a learning disability rather than autism.

**Exhibit 7. Poverty and exceptionality**




When disaggregated by age group, as shown in Exhibit 8, in grades K–5, RSD classifies a higher percentage of students with speech/language impairments and developmental disabilities. These seem appropriate as developmental disabilities are only an option until a student is 9, and many speech/language impairments are tackled in younger students. In the middle grades 6–8, there are larger percentages of students classified with specific learning disabilities and intellectual disabilities, and for high school-age students, there are larger percentages of students classified with other health impairments, autism, and emotional/behavioral disabilities. These raise some questions. For example, an intellectual disability does not begin in the middle grades. If a child has a brain injury after birth, this is called a traumatic brain injury (TBI), so this data seems inconsistent with what we know about intellectual disabilities. In another example, autism does not start when a child enters high school, so the fact that there is a higher percentage of students classified with autism in high school is questionable. Students classified with ADHD, a large portion of the students in the category of other health impairments, do not have ADHD in high school and not in middle or elementary school. These are questions that need to be considered.

**Exhibit 8. Exceptionality by age group**




We also examined state data on race and disability classification. Here, we are looking for any disproportionate representation of a group of students disaggregated by race. As research has made clear, there is no reason to assume that any one racial or ethnic group is more disabled than another group. Poverty is often seen as creating disability, however, the effects have been found to be negligible. In addition, if poverty created disability, logically, we should see higher rates of disability no matter the category. In fact, disproportion is found in the more subjective categories, such as other health impairment and intellectual disability, rather than the more objective disabilities, such as blindness, deafness, or Autism.

As shown in Exhibit 9, Washington State defines significant disproportionality as a risk ratio of >3.0 for three consecutive years. District are cited only for significant disproportionality. The state also has categories defining disproportionate overrepresentation (>2.0 to >3.0) and at risk for disproportionate overrepresentation (>1.5 to >2.0), no disproportionate representation (0.67 to 1.5), at-risk for disproportionate underrepresentation (>0.5 to >0.67), and disproportionate underrepresentation (≤0.5). Exhibit 10 shows that Richland does not have an issue with significant disproportionality representing students of color in special education, as defined by a risk ratio of >3.0 for three consecutive years.

That said, given the other criteria, American Indians/Alaskan Natives, Black or African Americans, and Caucasian or White students are either disproportionate overrepresented or at risk of disproportion in the following areas (highlighted in Exhibit 10):

- American Indians/Alaskan Natives
  - Disproportionate overrepresentation in emotional/behavioral disorder
  - At risk of disproportion in communication disorder
- Black or African Americans
  - Disproportionate overrepresentation in intellectual disability
- Caucasian or White
  - At risk of disproportion in autism

**Exhibit 9. OSPI defining risk ratio**

**Risk Ratio (RR)**

| ≤0.5 | >0.5 to <0.67 | 0.67 to 1.5 | >1.5 to <2.0 | ≥2.0 to <3.0 (3 consecutive years) | >3.0 (3 consecutive years) |
|---|---|---|---|---|---|
| Disproportionate Under-representation | At Risk for Disproportionate Under-representation | No Disproportionate Representation | At Risk for Disproportionate Over-representation | Disproportionate Over-representation* | Significant Disproportionality* |

*Note: The results of the calculations will be verified using multiple methods.

In terms of English Language Learners, we heard from the district that the numbers of students learning English had grown significantly and that that number of those students being qualified for special education services had also grown. At the time of writing this report, the numbers are too small to analyze for any disproportionate representation. We caution the district to keep track of these students and make sure that these students are not overrepresented in special education, as disproportionate representation of English Language Learners in special education is an issue across the nation.

## Exhibit 10. Indicator 9: Disproportionate representation of racial and ethnic groups in special education

| | Amer Ind/Alaska Native | | | | Asian | | | | Black or African American | | | | Native Hawaiian or Other Pacific Islander | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | *Weighted Risk Ratio* | | | Nov 2015 Fed count | *Weighted Risk Ratio* | | | Nov 2015 Fed count | *Weighted Risk Ratio* | | | Nov 2015 Fed count | *Weighted Risk Ratio* | | | Nov 2015 Fed count |
| **Indicator 9:** | **13–14** | **14–15** | **15-16** | | **13–14** | **14–15** | **15-16** | | **13–14** | **14–15** | **15-16** | | **13–14** | **14–15** | **15-16** | |
| All Disabilities | 1.71 | 1.54 | 1.58 | 10 | 0.55 | 0.45 | 0.55 | 25 | 1.22 | 1.58 | 1.35 | 32 | 2.01 | 0.76 | 0.87 | N<10 |
| **Indicator 10:** | | | | | | | | | | | | | | | | |
| Autism | 0.00 | 0.00 | 0.00 | 0 | 1.41 | 1.50 | 2.55 | N<10 | 0.76 | 0.37 | 0.26 | N<10 | 0.00 | 0.00 | 0.00 | 0 |
| Comm Dis | 0.80 | 2.01 | 1.78 | N<10 | 0.98 | 0.44 | 1.42 | N<10 | 0.70 | 0.83 | 0.35 | N<10 | 2.86 | 0.00 | 0.00 | 0 |
| EBD | 0.00 | 6.28 | 2.96 | N<10 | 0.00 | 0.00 | 0.00 | 0 | 0.00 | 0.00 | 0.88 | N<10 | 0.00 | 0.00 | 0.00 | 0 |
| Health Imp. | 4.07 | 2.36 | 1.12 | N<10 | 0.32 | 0.22 | 0.44 | N<10 | 1.57 | 1.80 | 1.44 | N<10 | 0.00 | 0.00 | 0.00 | 0 |
| Intellectual Dis | 2.62 | 5.21 | 1.39 | N<10 | 0.89 | 0.74 | 1.70 | N<10 | 1.54 | 3.89 | 2.87 | N<10 | 0.00 | 0.00 | 0.00 | 0 |
| SLD | 1.43 | 0.99 | 1.00 | N<10 | 0.16 | 0.21 | 0.53 | N<10 | 1.73 | 2.34 | 1.16 | 11 | 5.20 | 2.48 | 0.00 | N<10 |

| | Hispanic or Latino | | | | Caucasian or White | | | | Two or more Races – Multiracial | | | | Summary of the Data |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | *Weighted Risk Ratio* | | | Nov 2015 Fed count | *Weighted Risk Ratio* | | | Nov 2015 Fed count | *Weighted Risk Ratio* | | | Nov 2015 Fed count | Discrepant data for Indicator 9? |
| **Indicator 9:** | **13–14** | **14–15** | **15-16** | | **13–14** | **14–15** | **15-16** | | **13–14** | **14–15** | **15-16** | | No |
| All Disabilities | 1.36 | 1.38 | 1.28 | 234 | 0.83 | 0.82 | 0.86 | 801 | 0.87 | 1.00 | 1.01 | 44 | **If yes, in what area(s)?** |
| **Indicator 10:** | | | | | | | | | | | | | n/a |
| Autism | 0.53 | 0.56 | 0.48 | 15 | 1.34 | 1.48 | 2.02 | 120 | 1.44 | 1.12 | 0.57 | N<10 | Discrepant data for Indicator 10? |
| Comm Dis | 1.26 | 1.08 | 0.75 | 32 | 0.77 | 0.90 | 1.08 | 142 | 1.41 | 1.90 | 1.67 | 12 | |
| EBD | 0.54 | 0.39 | 0.81 | N<10 | 2.69 | 1.64 | 1.36 | 32 | 1.31 | 2.07 | 0.63 | N<10 | No |
| Health Imp. | 1.12 | 1.17 | 0.83 | 36 | 1.04 | 1.05 | 1.30 | 159 | 0.40 | 0.62 | 0.62 | N<10 | If yes, in what area(s)? |
| Intellectual Dis | 2.25 | 1.60 | 1.25 | 20 | 0.60 | 0.53 | 0.58 | 44 | 0.00 | 0.00 | 0.61 | N<10 | n/a |
| SLD | 1.70 | 1.93 | 1.47 | 92 | 0.66 | 0.61 | 0.71 | 202 | 0.80 | 0.71 | 0.99 | 13 | |

*Educational Environment*

The purpose of the IDEA is to ensure all students with disabilities are provided with a free, appropriate public education (FAPE) that includes special education and related services designed to meet students' unique needs and prepare them for postsecondary education, employment, and independent living. Furthermore, all services are required to be provided in the least restrictive environment (LRE) appropriate for the student.

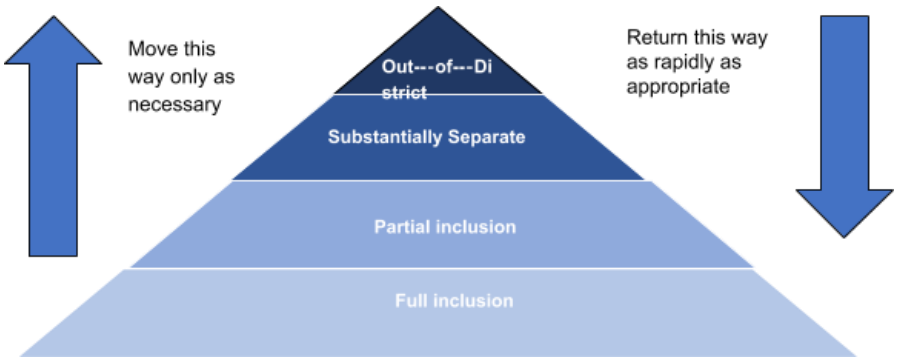
Research has consistently shown a positive relationship between effective and inclusive instruction and better outcomes for students with disabilities, including the following:

- Higher academic performance
- Higher likelihood of employment
- Higher participation rates in postsecondary education
- Greater integration into the community

The 10-year National Longitudinal Transition Study-2 (NLTS 2) described the characteristics, experiences, and outcomes of a nationally representative sample of more than 11,000 youth, ages 13–16, who were receiving special education services in grade 7 or above when the study began in 2001. The study found that while more time spent in general education classrooms was associated with lower grades for students with disabilities compared to their nondisabled peers, students who spent more time in general education settings scored closer to grade level on standardized math and language tests than did students with disabilities who spent more time in separate settings. Research also shows that including students with a range of disabilities in general education classes does not affect the achievement of their nondisabled peers.

IDEA requires local school districts to provide a continuum of special education services to their students, ranging from special education supports and services provided directly or indirectly to students in the general education classroom, where most students should be placed, to special education services provided outside of the general education class and even outside of the general education school. If a student's need is so great that the district cannot provide supports, the district is to provide this small population of students with an educational placement outside of the district that meets their needs. Exhibit 11 provides a visual representation of a comprehensive continuum of special education services.

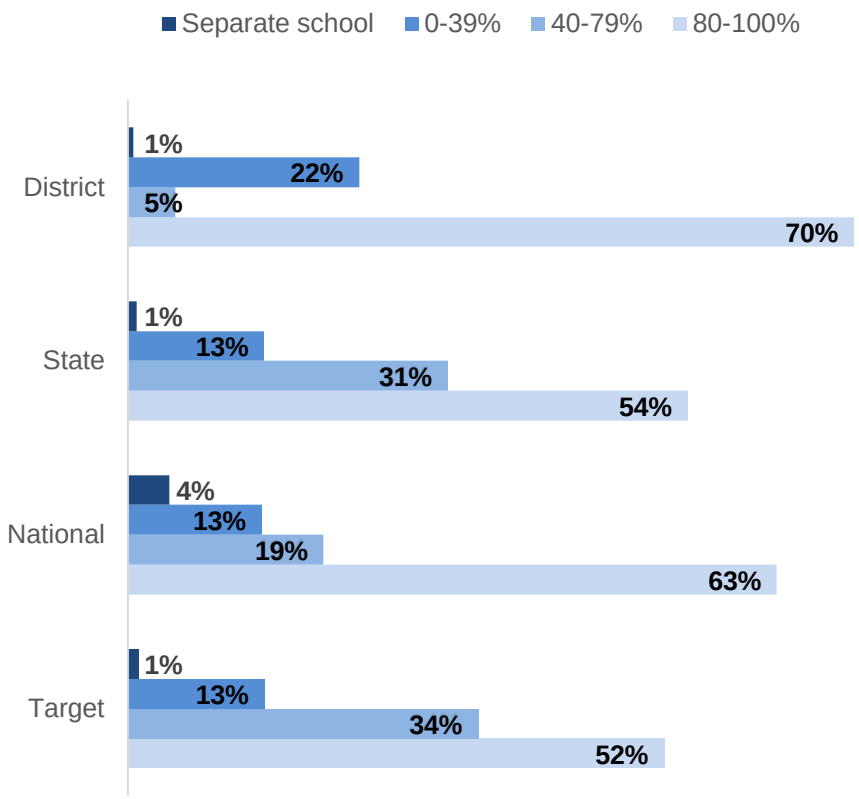
**Exhibit 11. Continuum of special education services**




When examining educational environment, as shown in Exhibit 12, we look first to the nation and see that the majority of students with disabilities (63%) are educated 80%–100% in the general education classroom, the next largest group (31%) are educated 40%–79% in the general education classroom, followed by the next largest group (13%) educated 0%–39% in the general education classroom, and the smallest group (4%) educated in a separate school. The state targets have a similar trend; however, smaller percentages are noted for 80%–100% and larger percentages educated for 40%–79% in the general education classroom.

Now examining RSD, we see a different trend from the state and nation, with a higher percent of students with disabilities educated for 80%–100% of their time in the general education classroom, often called full inclusion (70%), a lower percentage educated 40%–79% in the general education classroom, often called partial inclusion (5%), and a higher percentage educated 0%–39% in the general education classroom, often called substantially separate (22%). Such a trend triggers a positive reaction and some questions. While it is positive that the district has a high percentage of students educated in the general education environment, it also has a high percentage of students educated in special education settings and very few educated in the more flexible space of 40%–79% time in general education classes. What services and supports are students receiving in their self-contained classes that they cannot receive in less time in this setting, and what supports and services are students receiving in the general education environment?

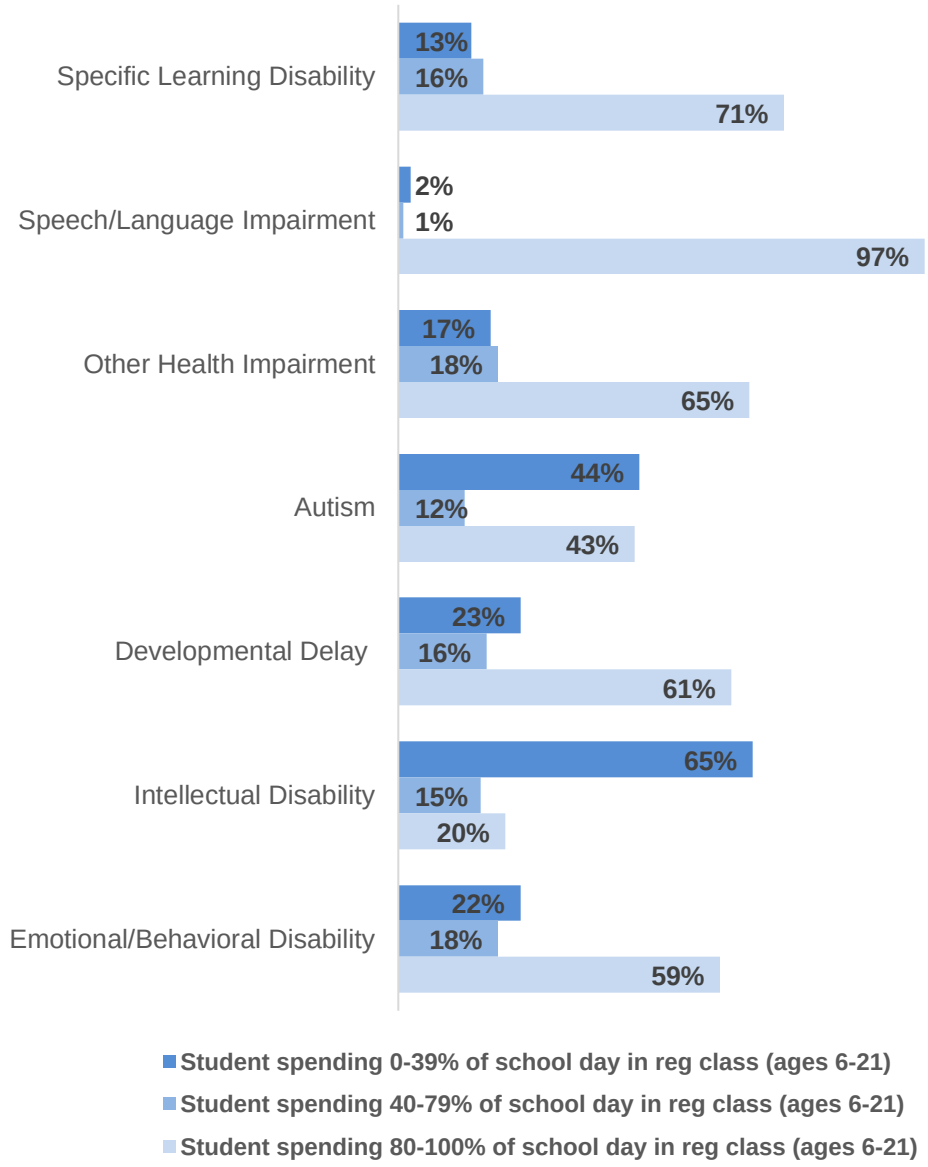
**Exhibit 12. Percent of time spent in a general education classroom (ages 6–21)**[15]




Disaggregating these data by disability type, as shown in Exhibit 13, the majority of students classified with specific learning disabilities, speech/language impairments, other health impairments, developmental delays, and emotional/behavioral disabilities spend 80%–100% of their time in the general education classroom. Approximately half of the students with autism spend 80%–100% of their time in the general education classroom and the other half in separate special education settings. The majority of students with intellectual disabilities spend their time in separate special education settings. Research is clear that there have been no studies showing academic benefit to students educated in separate settings and this includes students with intellectual disabilities.

[15] ***District, State, and Target***: OSPI Washington State Special Education Performance Data, Data included in the FFY 2015 Annual Performance Report, "5. Percent of students with IEPs aged 6 through 21, who spend X% of the day in the regular class/environment, 2015 – 2016;" ***National***: Department of Education IDEA Section 618 Data Products: Static Tables, "Number of students ages 6 through 21 served under IDEA, Part B, by educational environment and state: 2015-16."

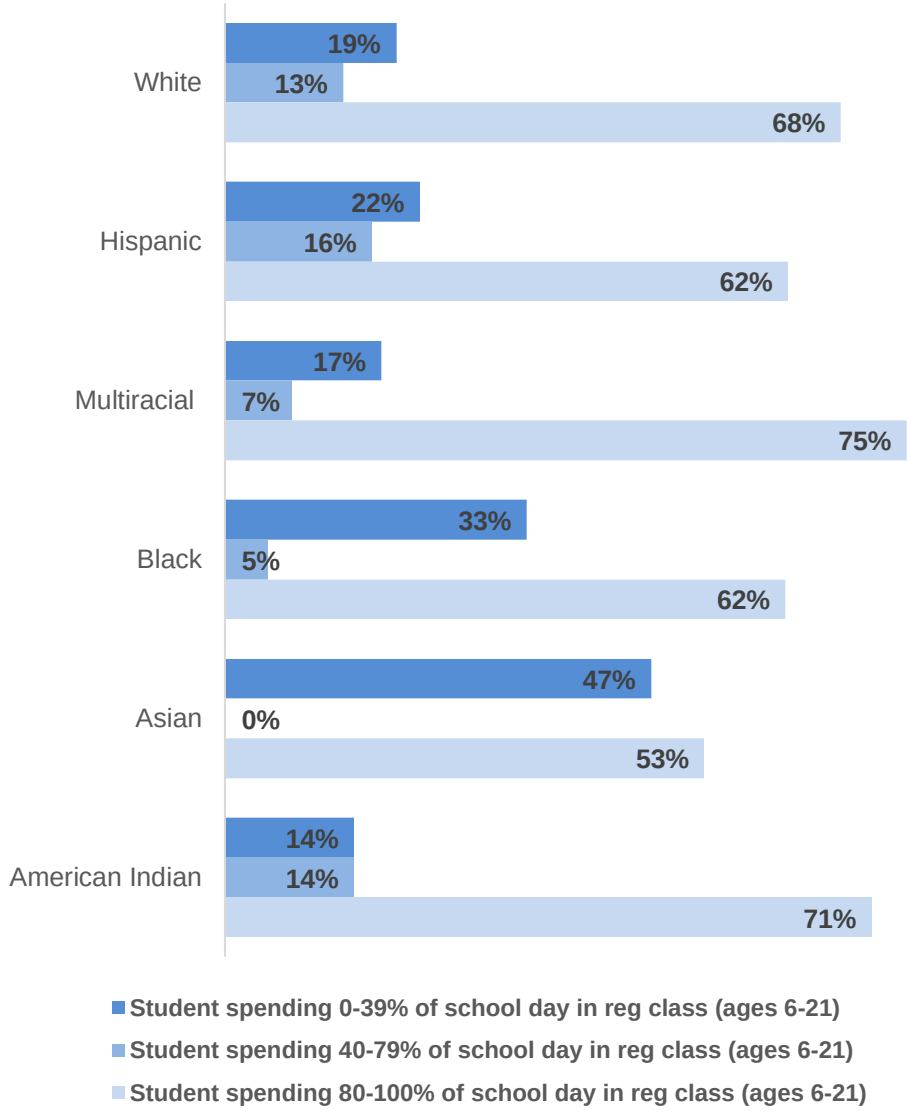
**Exhibit 13. Time in the general education classroom, by exceptionality type [16]**




Disaggregating these data by race, it is clear that for all racial groups, the majority of students spend 80%–100% of their time in the general education classroom. As such, compared to their peers in other racial groups, Black, Asian, and Hispanic students are less likely to be educated in general education classes (Exhibit 14).

[16] Exceptionalities with less than 10 students in a category have been suppressed.

**Exhibit 14. Time in the general education classroom by race**




*Recommendation 6: Examine classification, evaluation, and placement practices to assure fidelity and track classification and educational placement data.*

Evaluate criteria for classifying students with disabilities, ensuring that classification criteria are up-to-date, entrance criteria are well-developed, and there is fidelity of using those criteria to ensure that students who are classified as having a disability are done so appropriately, paying specific attention to classification of specific learning disabilities, which is low in the district, but higher for students in poverty and the classification of other health impairment, which is high in the district and also grows as students are older and the disproportionate representation of American Indians/Alaskan Natives and Black or African Americans. Further, we encourage the district to pay attention to the classification of students who are English Language Learners as the population in the district grows. Finally, the district should track these data and take action where appropriate.

Addressing educational placements, we recommend that the district ensure that placement decisions are made with the understanding the general education class is always the place to start. To remove a student from the general education class is a significant decision and must be justified. As shown in the data above, there is evidence that in the district, students are predominantly in the general education class, and the next largest group is placed in a substantially separate special education classroom. We encourage RSD to make use of the more flexible partial inclusion. Further, the district should track these data and take action where appropriate.

We offer three resources that discuss the positive outcomes of inclusive practices for students with and those without disabilities:

- A Summary of the Evidence on Inclusive Education
- SWIFT Research Brief on Inclusive Education's Benefits
- National Center on Inclusive Education: Research on Inclusive Education

We additionally want to provide two suggestions to use proactively to avoid the issue of overrepresentation of English Language Learners.

- *Increase awareness and skills of teachers and school leaders to distinguish language acquisition from a learning disability.*

  A primary challenge faced by educators is distinguishing between learning disabilities and language acquisition. Across the United States, state and local education agencies are developing processes to mitigate the over-identification and under-identification of English learners with disabilities. English learners are over-identified if they struggle to achieve similar academic progress as their English-Only or English-Fluent peers. Assessments are often inaccurate because the testing instruments are only validated for use with English speakers. In other cases, students are under-identified due to the lack of assessment and evaluation tools determining if a student is experiencing common struggles acquiring English or truly has a disability that hinders their academic progress (Maxwell and Shah, 2012).

  We recommend the provision of professional learning experiences for all teachers to help them distinguish difference from disability. Teachers need a clear process for what to do before referring an English learner for special education services. This process for providing instruction and intervention support should reflect and acknowledge the cultural diversity among students and plan to design instruction tailored to their unique language and learning needs (Artiles & Ortiz, 2002; Haager, Klinger, & Vaughn, 2007). By using a Multi-Tiered System of Supports framework, schools will be able to match instructional services to student need to ensure equitable access and opportunity in meeting grade level standards. For resources and strategies for identifying and supporting ELLs with learning disabilities, we recommend the district consult WestEd to access tools to distinguish between language and disability, manuals to supplement instruction, and data to identify EL students with disabilities.

- *Develop culturally and linguistically responsive practices to support academic success of ELLs in the general education setting.*

Culturally responsive teaching "connects students' cultural knowledge, prior experiences, and performance styles to academic knowledge and intellectual tools in ways that legitimize what students already know" (Gay, 2000). Culturally responsive practices are especially relevant for English learners who may feel isolated in a foreign culture. Teachers should invest in developing a deeper understanding about students' backgrounds and the way in which their culture influences their daily interaction with their peers and adults in the school.

We recommend that Richland develops or adopts a culturally responsive framework that helps teachers make content accessible by tapping into ELL's existing sources of knowledge and experience. This framework will include teaching practices to build students' background, instructional strategies, and modes of interacting that allows students to enhance their language and content knowledge.

***Observation 7: Academic Achievement***

***The academic achievement of students with disabilities in Richland School District is below the academic achievement of students without disabilities.***

Using large-scale assessments as a measure of academic achievement, students with disabilities in Richland are achieving at lower standards than their peers without disabilities. While unfortunately not an uncommon occurrence, one of the main goals of special education is to level the playing field between those with and without disabilities so that a student's disability does not impede their ability to succeed. There are practices that support high academic achievement and places that have succeeded.

To begin, it is important to understand that a small minority of disability classifications actually affect cognition (intellectual disability, and many, but not all, students classified with autism, multiple disabilities, and TBI). For the vast majority of disability classifications (specific learning disability, speech/language impairment, other health impairment, emotional/behavioral disability, orthopedic impairment, visual impairment/blindness, hearing impairment, and deafness), limited cognitive functioning is not part of the definition. According to the National Center for Learning Disabilities, "Lack of effective instruction can limit opportunities and lead to poor outcomes for students with learning and attention issues… With the right support, these students can achieve at high levels."[17] Research conducted on inclusive practices find that high expectations and being educated in the general education class by content experts is key to the students' success.[18] An in-depth study of inclusive schools in Boston, Massachusetts, highlights schools that are inclusive and where students with and without disabilities are high-performing.[19]

Examining Richland's Washington Kindergarten Inventory of Developing Skills (WaKIDS)[20] data as shown in Exhibit 15, again, it is clear that students with disabilities are less ready for success in school as they are performing at lower academic levels than their peers without disabilities, specifically, language (77% vs. 55%), literacy (83% vs. 52), and math (71% vs. 53%).

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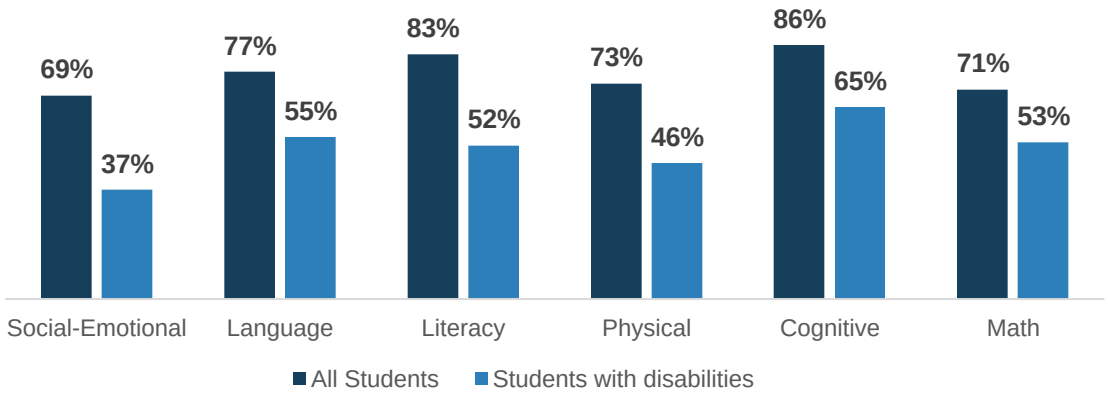
[17] https://www.ncld.org/supporting-academic-success

[18] http://alana.org.br/wp-content/uploads/2016/12/A_Summary_of_the_evidence_on_inclusive_education.pdf; add long form research doc from UNH.

[19] Effective inclusive – p. 14

[20] OSPI Washington State Report Card, Richland School District, WaKIDS, 2016–2017

**Exhibit 15. Percent of students who demonstrate characteristics of entering kindergartners**




Examining Richland's Smarter Balanced data for 4th and 8th grades in Exhibit 16, it is clear that students with disabilities perform at remarkably lower rates than their peers without disabilities; in 4th grade ELA (21% vs. 58%) and math (22% vs. 58%) and in 8th grade ELA (16% vs. 53%) and math (10% vs. 43%).

**Exhibit 16. Smarter Balanced scorecard – 2016-17[21]**

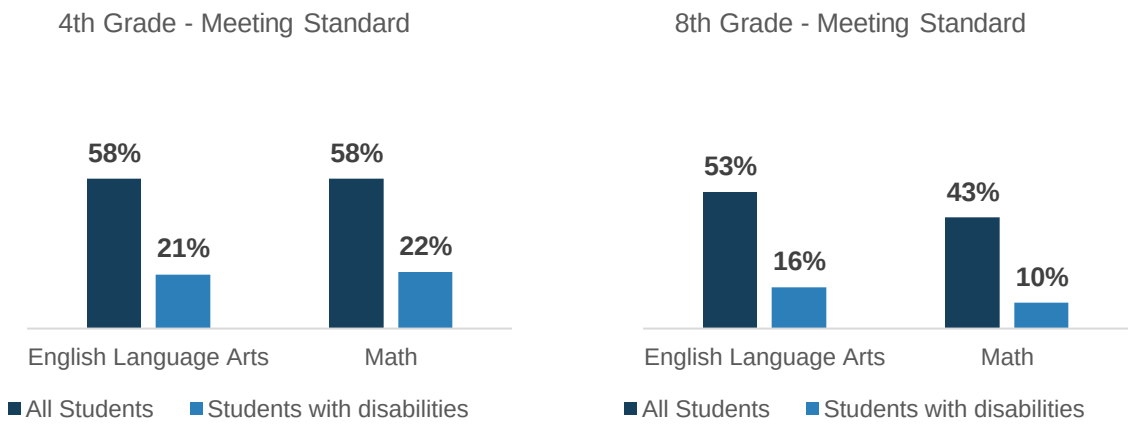
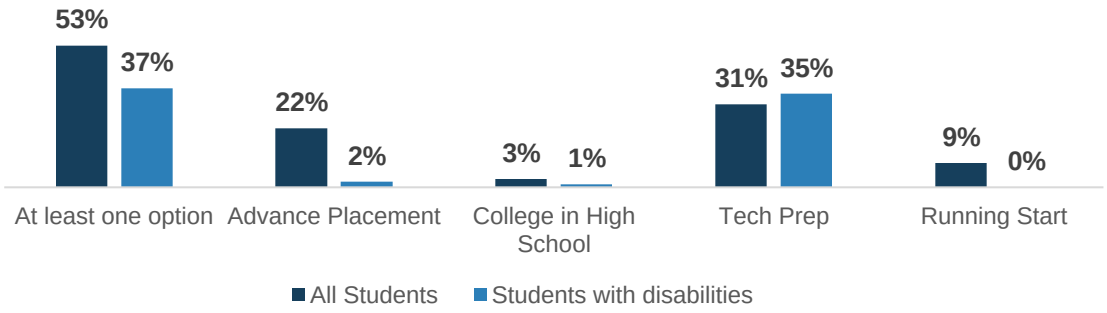



Exhibit 17 shows which students are enrolling in duel credits in high school.[22] As shown, a small number of students with disabilities compared to their peers without disabilities are participating in advanced placement course (2% vs. 22%), and more students with disabilities are participating in technical preparation than their peers without disabilities (35% vs. 33%). This suggests that fewer students with disabilities are enrolling in courses with very high academic standards.

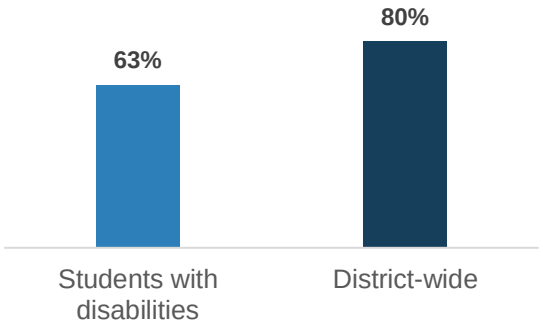
[21] OSPI Washington State Report Card, Richland School District, Smarter Balanced, 2016–2017
[22] OSPI Washington State Report Card, Richland School District, HS Dual Credit, 2016–2017

**Exhibit 17. High school dual credit participation by student demographics and program**




Finally, examining graduation rates, we see first in Exhibit 18 that as a whole, the district graduation rate is 80% and the graduation rates of students with disabilities is lower, at 63%.

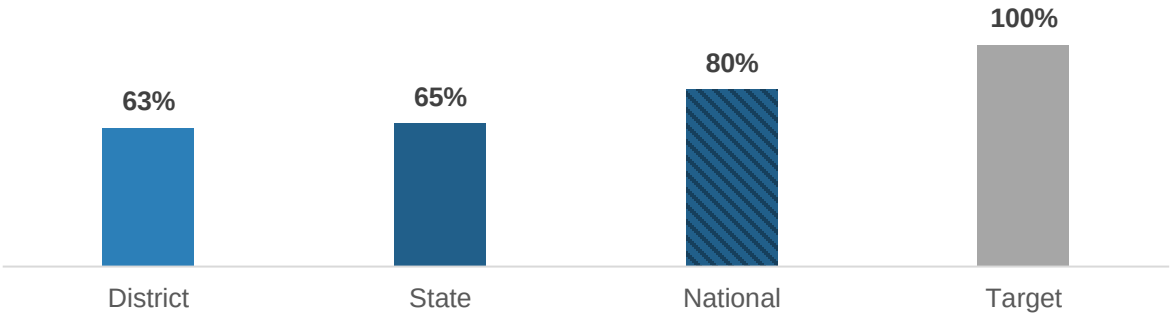
**Exhibit 18. Percent of youth graduating from high school with a regular diploma[23]**




Examining RSD's graduation rates for students with disabilities compared to the state, as shown in Exhibit 19, is comparable at 65%. Comparing the district and state's graduation rates with the nation's rates of students with disabilities graduating from high school at 80%, it is clear that Washington and Richland are lower.

[23] *District, State, and Target*: OSPI Special Education, Data included in the FFY 2015 APR "1. Percent of youth with IEPs graduating from high school with a regular diploma," from Washington State Special Education Performance Data – Richland District 2014-2015; *National*: Department of Education IDEA Section 618 Data Products: Static Tables, "Number of students ages 14 through 21 with disabilities served under IDEA, Part B, who exited special education, by exit reason and state: 2014-15."

**Exhibit 19. Percent of youth with IEPs graduating from high school with a regular diploma[24]**




*Recommendation 7: Using the MTSS process embedded with the UDL framework, improve academic outcomes for students with disabilities.*

It is imperative that the district focus on improving academic achievement for students receiving special education services. Achievement data and classroom observations indicate that a significant number of students with disabilities are receiving services in the general education classroom for more than 80% of the instructional day; however, students with disabilities are faring worse on the Smarter Balanced assessments for English language arts and math than students without disabilities. Factors that may influence lower achievement levels for students often stem from the classrooms where students lack opportunities, access, and progress due to barriers in the environment and instruction.

Educational literature increasingly refers to the benefits of proactively creating a learning environment that engages diverse learners. As previously presented in Observation/Recommendation 2, the MTSS framework provides tiered systems of supports. Universal design for learning (UDL) is a "framework to improve and optimize teaching and learning for all [students] based on scientific insights into how humans learn" (CAST, 2018). UDL is used to guide the instructional design of assessments, curriculum, materials, and teaching methodology by removing barriers that prevent students from achieving mastery. UDL reinforces the concept of learner variability within and across educational settings. The UDL framework helps all learners be successful. In order for the district's curriculum framework to focus on UDL, in the MTSS process, the district should incorporate UDL principles and practices in reading, math, science, and social studies classroom instruction.

***Observation 8: Special Education Vision***

***RSD lacks a clear vision and mission of what special education should be and specific action steps on how to achieve these goals.***

There is not a clear vision or understanding of what is special education as it has been entangled in the confusion surrounding misunderstandings of the RTI model and reactions to citizen's complaints. This

[24] *District, State, and Target*: OSPI Special Education, Data included in the FFY 2015 APR "1. Percent of youth with IEPs graduating from high school with a regular diploma," from Washington State Special Education Performance Data – Richland District 2014-2015; *National*: Department of Education IDEA Section 618 Data Products: Static Tables, "Number of students ages 14 through 21 with disabilities served under IDEA, Part B, who exited special education, by exit reason and state: 2014-15."

confusion is rooted in recent history. The district has seen significant changes in leadership over the last five years. The previous administrator responsible for RTI and special education held the role for some time, and we were told kept the special education department separated from the rest of Central Office. This included decision-making for programming, budget decisions, curriculum decisions, and professional development. Staff noted there was little to no collaboration with the special education department, and the focus shifted to an RTI model, as opposed to specially designed instruction. During this time, there was a significant shift in practice, and the district has moved to a Case Manager model. Under the Case Manager model, there was typically a special education teacher assigned to the student. The Case Manager acted as the point of contact for school personnel and parents with the goal of ensuring that the services in the IEP were in place and delivered with fidelity. The Case Manager also supported the IEP development and gathers information about the student's progress throughout the IEP period.

This practice was in place for some time until a citizen complaint was filed, and the district was mandated by OSPI to change their practice and provide services as outlined in students' IEPs. This resulted in a fundamental shift in practice across the district. It was during this transition that the current Interim Executive Director of Special Education was moved into the role.

At this time, the special education department has been working hard to address citizen complaints that continue to be filed against the district. The current Interim Executive Director of Special Education has been focused on reactive strategies as opposed to proactive strategies since there are so many issues that need to be addressed. This takes her away from planning new initiatives for the special education department. In our conversations with staff, it was noted there are three vacant administer positions in the special education department. This will also make it challenging to focus on proactive and strategic planning until these leadership roles are solidified and filled. However, it does provide the district with the opportunity to closely examine these roles and make necessary changes to these positions in order to support the department in working more efficiently and effectively. For example, the current Interim Executive Officer of Special Education is responsible for overseeing middle schools and magnet programs. Magnet programs in the district refer to substantially separate programs for students with severe disabilities that cannot be served in more inclusive settings. This is not a typical practice, as the Executive Director of Special Education should oversee all areas of special education, and the department's Assistant Directors should oversee the day-to-day functioning of special education programs.

> *Recommendation 8: Special Education must go through a process to create a vision and strategic plan focused on the educational outcomes of students with disabilities and aligned to the district's overarching focus on reducing the income-based achievement gap.*

Once the special education leadership positions are filled, we recommend the department develop a plan that focuses on a broader vision for special education. The vision should be specific to special education services and students with disabilities but also aligned with the district's plan. As part of the department's strategic plan, the team should consider these questions:

1. What is the district's vision for providing students with the best special education services?
2. What are the goals that will get the district to this vision?
3. What are the steps that that district needs to take that will allow it to meet these goals?

From the vision and goals, the department can create a strategic plan that lays out the road map and tells the community what you are going to do and when and what data you will collect as evidence. A

strategic plan for the department should include a timeline of activities, a communications plan, performance metrics, and a map of what professional development staff might need and when and how they will receive it. Many of the goals in the strategic plan can be pulled from the recommendations in this report to help guide its development. It is our understanding that the Deputy Superintendent is also going to be working on a district strategic plan when she takes over as Superintendent. We strongly recommend that the district strategic plan and the special education strategic plan align so all central office- and building-level staff are working toward the same goals for general education and special education. To move toward the vision, the department might conduct a needs analysis and spend time in classrooms to identify areas for improvement. Examples of such assessments include the ASCD School Improvement Tool, the North Dakota Special Education Improvement Planning Guide and the North Carolina Comprehensive Needs Assessment.

Many staff felt that the special education department is removed from the day-to-day challenges of working with students with disabilities. Therefore, spending more time in buildings will not only help the department determine which areas require more support, but it will also develop a stronger culture as staff feel they are supported in their roles. Principals were open to the idea of having staff from the special education department work collaboratively to visit special education services in general education classes and separate special education classrooms and support the teacher evaluation process, when necessary.

We would like to provide two examples of strong strategic plans, one from the Tacoma Public Schools[25] and the other from the Syracuse City School District.[26] Tacoma used recommendations from a review such as this to create its strategic plan, timeline of activities, performance metrics, and communication plan. Syracuse did the same, and the document also shows how their plan aligns to the district's overarching strategic plan but includes a theory of action and goals specific to the special education department. We suggest using these and other districts' work to help guide Richland's planning process.

***Observation 9: Special Education Supports and Services***

> ***As stated, there is not a clear understanding of what is special education. Specifically, special education does not appear to be a service supporting students to succeed in the general education curriculum; there is limited understanding of the flexibility within a continuum of special education services and supports; few special education supports and services are provided in the general education environment; and there is limited understanding of what is specially designed instruction (SDI).***

Special education in Richland School District is not clearly defined. This is in line with the fact that school district has no stated vision or goals for how special education supports and services should be provided. Staff reported confusion as to what is special education and what are tiered supports that are typically Read 180 or Math 180. While effective for some students, special education is focused on the individual student's unique needs. Students with disabilities may need support accessing the general

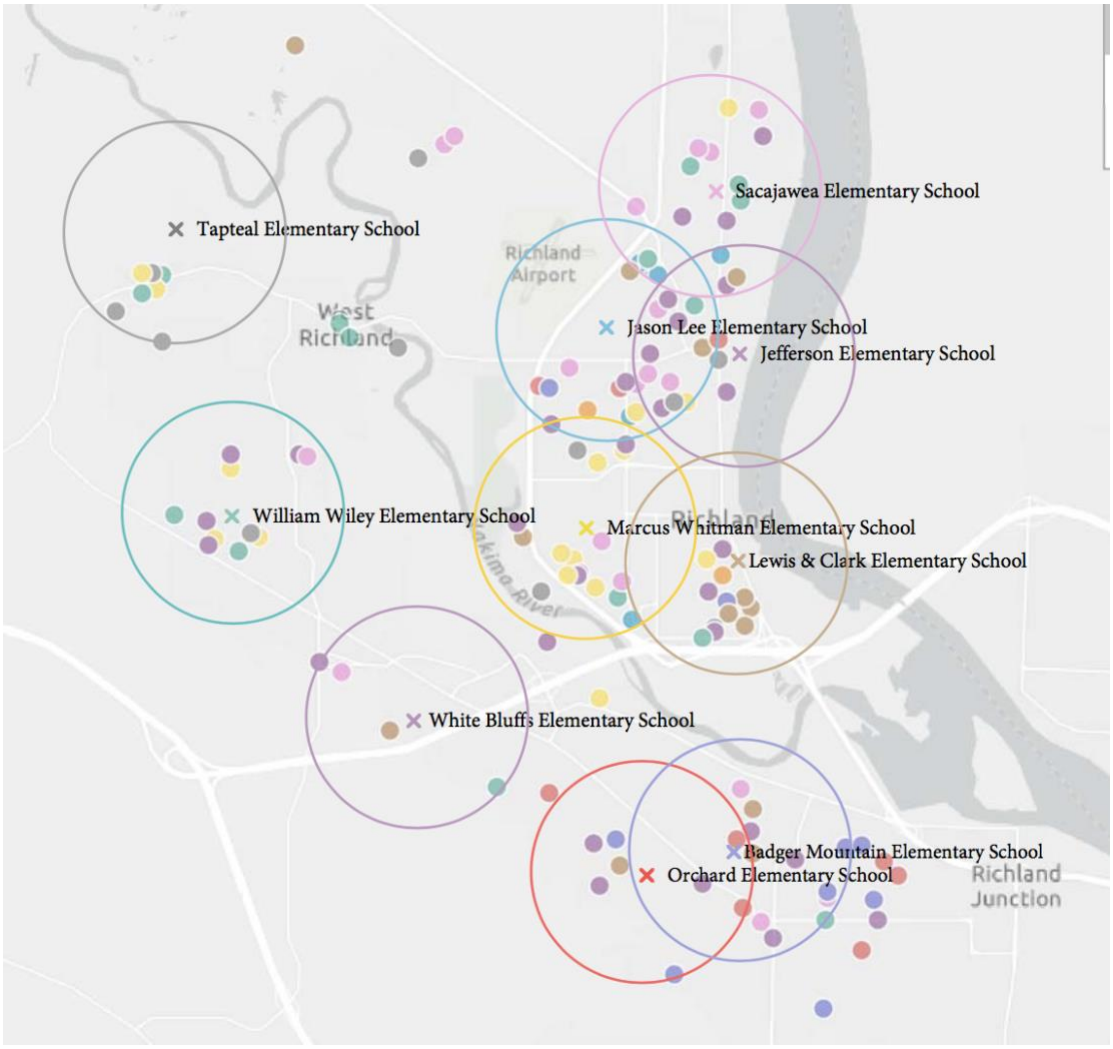
[25] Tacoma Public Schools. (n.d.) Student Services: The Urban Collaborative: Information and resources. Retrieved from https://www.tacomaschools.org/se/Pages/Urban_Collaborative.aspx

[26] Syracuse City School District. (n.d.) Special education: 3-year strategic plan. Retrieved from http://www.syracusecityschools.com/tfiles/folder610/Special%20Education%203-Year%20Strategic%20Plan.pdf

education curriculum; they may require supplemental supports in order to build academic or behavioral skills; or they may require related services such as speech and language to access the curriculum. Those few students with cognitive disabilities may require modified curricula, whereas now they have limited options available to them. There is also a lack of clarity about the continuum of services, with some schools providing flexible supports in and out of the general education environment and other schools providing those supports only outside the general education environment. We observed little evidence of general and special educators collaborating to provide supports and services. For many students in self-contained classes who spend some of their time in general education, a typical pattern is to assign them to "specials," such as art and music as opposed to academic classes. We saw limited evidence of the development of inclusive supports and services that match the individual student's strengths and needs. In fact, the majority of the special education services we observed were provided outside of the general education class. While this does provide targeted supports, such practices require students to move to the program or be transported to a different school, rather than students receiving the service in the school they would attend if they did not have a disability.

To gain a sense of the extent of students attending schools more than 1-mile from their home, we developed a map of where students who receive special education services attend school. Exhibit 20 shows a map of elementary school students receiving special education services and the elementary schools they attend. Each school is surrounded by a circle depicting a 1-mile radius and a unique color. Dots represent students, and the color of the dot represents the school's color. As an example, Sacajawea Elementary School has the color pink. Pink dots represent students with disabilities who attend Sacajawea. Pink dots within the circle surrounding Sacajawea represent students who live within a 1-mile radius of the school. Pink dots outside of the circle surrounding Sacajawea represent students who live more than 1-mile from the school. As seen on the map, there are more pink dots outside the circle than inside the circle, there are more students with disabilities attending Sacajawea who live more than 1 mile from the school. This trend appears to be the case for all schools except Jason Lee, Lewis & Clark, and Tapteal. To the extent possible, students should attend the school they would attend if they did not have a disability. This allows for stronger community bonds for the students and parental bonds with the school. This also removes the need for students to spend time in busses. Further, there is a cost for transporting students to different schools, and these funds could be used toward robust supports and services.

**Exhibit 20. Map of students enrolled in elementary school receiving special education services, where they live, and schools they attend[27]**




*Recommendation 9: Ensure that there is a full continuum of services throughout the district, with an emphasis on inclusive practices and supports and services that provide access to both the general education curriculum and the specially designed instruction.*

Richland School District must develop a full continuum of services throughout the district, with an emphasis on inclusive practices and supports and services providing access to both the general education curriculum and specially designed instruction, specifically:

[27] Note: This map shows only the elementary schools (X's), a 1-mile radius around the school (circles), and elementary students with disabilities (dots). The colors of the dots corresponds with the school the student attends. For example, the Tapteal School is color-coded in grey. Grey dots (students) within the grey circle (1-mile radius of school) are students who attend Tapteal and live within a 1-mile radius of the school. The yellow and teal dots within the Tapteal circle represent student who live within a 1-mile radius of the school but attend other schools (yellow = Marcus Whitman, teal = William Wiley).

- To begin, the district needs to focus supports and services that provide students with access to the general education curriculum, or the core curriculum, no matter students' skill level.
- Special education supports and services must also provide specially designed instruction to develop students' skills so they can access the general education curriculum.
- Special Education needs to identify supplemental materials that provide explicit and sequenced-based systematic reading and math instruction based on students' needs and IEP goals and that supports moving all students to greater independence.
- Benchmarks should be defined that drive instruction and measure student growth against standards and IEP goals.

Richland must develop a full continuum of services, with the flexibility for more inclusive options in each school that allow students to access curriculum and receive specially designed instruction. There should be room for the development of collaborative practices where general and special education teachers plan and teach together and provide both direct supports, such as specially designed instruction, and indirect supports, such as accommodations and consultative services.

***Observation 10: Individualized Education Programs***

***While the IEP process is generally technically compliant, issues related to the understanding of disability and special education supports and services are evident in the IEP. Specifically, IEPs are developed with low expectations of students with disabilities and an overreliance on disability classification to make disability and placement determinations. In addition, there are not effective processes for general education staff and paraprofessionals to know and be educated concerning the most relevant information in the IEP.***

IEPs in Richland are generally technically compliant; however, IEP contents often include low expectations and placement decisions based on disability classification. There is a lack of clarity as to how to focus on accessing the curriculum, what is specially designed instruction, how to provide these services in a general education setting and when to use a separate setting.

Technically, staff are not clear as to who has access to IEPs, and there is no process in the district for general education and paraprofessionals to have access to the most important information in the IEP. There are also not enough translators to attend IEP meetings and to translate documents. Finally, there is no process for deciding on independent evaluators, no list to choose from, and no pricing guidelines that the district has negotiated with these evaluators.

*Recommendation 10: Develop IEPs with a deep understanding of disability and the possibilities of effective and inclusive individualized special education supports and services, and processes to share this information with all who work with the student.*

To begin, IEPs should be based on the expectation of high academic standards of the general education curriculum. Within the MTSS framework and utilizing the principles of UDL, specially designed instruction can support the development of skills and accommodations should focus on accessing the students' grade level curriculum. Very few students should not have access to the general education

curriculum. Placement decisions need to start with the general education class, and if there is any specially designed instruction that cannot be provided in the general education class, then a justification can be made. Professional development for special education staff must include these concepts.

In addition, there must be a process for general and education staff and paraprofessionals to know who has access to IEPs and to be educated concerning the most relevant information in the IEP. This can be accomplished with a summary document, which is sometimes called an "IEP at a glance." There also needs to be a concerted effort to have more translators for IEP meetings and to document the translation, perhaps through a third-party agency. Finally, we suggest that the district create a district list of independent evaluation providers with negotiated fees for IEP teams to choose from.

***Observation 11: School Leadership***

> ***Principals are willing to, and have taken more ownership of, the special education process in their schools. However, the focus of the special education department's work with principals has been on the details of the IEP process, and there is to date limited communication and collaboration between the special education department and principals as it relates to instruction and student success.***

The district's Special Education office has taken several steps to share responsibility with school principals. This year, principals were trained on special education law, developing standards-based IEPs, and serving as a member of the IEP team. However, at this time, principals have been directed to focus on compliance instead of supporting and monitoring instructional improvement efforts as they relate to students with exceptionalities. The absence of school leadership dedicated exclusively to student achievement has led to the increased exclusion of students from the general education classroom, incoherence in instructional strategies, and a lack of frequent coaching and support for general and special education teachers. This issue has also contributed to many school principals feeling overwhelmed and ineffective in impacting this population.

As instructional leaders, principals are responsible for giving feedback, modeling effective instruction, supporting collaboration, providing professional development opportunities, and communicating an instructional vision (Blase and Blase, 2000). To date, principals in RSD have struggled to prioritize high-quality teaching and learning due to a lack of time, increased paperwork, and a perception from the district that their role is to serve as a compliance manager. Educating students with disabilities is a critical dimension of an instructional leader's role; however, without the knowledge and skills to understand how disabilities mitigate educational performance, school leaders will not be able to adequately set high expectations or invest in creating strong programs. To that end, we have identified several recommendations for RSD to improve outcomes for all exceptional learners.

> *Recommendation 11: Further develop systems of collaboration and provide guidance that support principals to use their expertise as instructional leaders to participate in the determination and implementation of special educational supports and services to students with disabilities in their schools.*

RSD principals are willing and have the ability to be active participants in the determination and implementation of special education supports and services to students with disabilities in their schools. In order to develop the collaborative process and build the skills of principals, we suggest that the Office of Special Education conduct an analysis to determine the principals current levels of knowledge and experience as they relate to providing effective instructional leadership. Such an analysis could include a survey or information from focus groups or shadowing principals as they monitor IEP meetings or support teachers. This could lead to working with principals to develop professional goals to improve their practice as instructional leaders, identifying gaps as they relate to behavior management, leading and facilitating collaborative teams, or constructing positive learning environments for diverse learners. Finally, the district could develop and provide a professional development model to deepen instructional leaders' understanding of disability; its varied impact on learning; as well as evidence-based instructional methods, techniques, and strategies.

***Observation 12: Staffing***

***While RSD employs highly qualified special educators, the district relies heavily on the use of paraprofessionals to provide special education services and does not use an appropriate number of teachers, instructional specialists, mental health providers, literacy specialists, etc., to support effective and inclusive special education supports and services.***

Richland School District employs a cadre of highly qualified special educators. In interviews with Central Office staff, we repeatedly heard that they were proud of their teachers and other staff. We found also that the district had explored multiple avenues to build its teacher pipeline, including partnering with local institutes of higher education to train paraprofessionals to become teachers and work with interns to provide behavioral supports. The district also created elective courses in their high schools for students to serve as mentors or peer support for students with significant disabilities, and many of these students have gone on to major in special education and return to the district to serve as special education teachers.

While the teaching staff was solidly in place, we found through staffing data, interviews and focus groups, classroom observations, and reading the REA contract that the district has a heavy reliance on paraprofessional support. Paraprofessionals' work occurs in supporting roles but also in the provision of direct instruction. Paraprofessionals are used in classrooms, both special and general education, and on buses and to support related services staff as well as itinerant staff. We recognize that the use of paraprofessionals is done with positive intentions, and we understand that paraprofessionals are often assigned with the intention of supporting a variety of areas, including assisting students with disabilities, supporting the work of classroom teachers and special educators, and being responsive to requests from parents. While we understand trained and supervised paraprofessionals serve an important need, this seemingly logical solution can lead to a dilemma at both the school and district levels. This does not mean that actual paraprofessionals are the problem. We recognize that this dedicated workforce is often underappreciated in school systems. However, we also recognize that an overreliance on paraprofessionals is often indicative of underlying systemic issues (Giangreco, Smith & Pickney, 2006).

We believe that paraprofessionals perform their work in the following roles:

- Social skills paraprofessionals – Responsible for delivering social skills lessons to small groups.

- Itinerant paraprofessionals – Responsible for supporting all itinerant staff, including occupational therapists, physical therapists, and speech and language therapists.
- Behavior paraprofessionals – Assigned to various buildings and work under school counselors to support students who are experiencing behavioral challenges.
- Transportation paraprofessionals – Responsible for supporting students on the bus both to and from school. These paraprofessionals are not working in schools, only on the bus.
- General education paraprofessionals – Responsible for supporting the delivery of Tier 3 interventions for general education teachers.

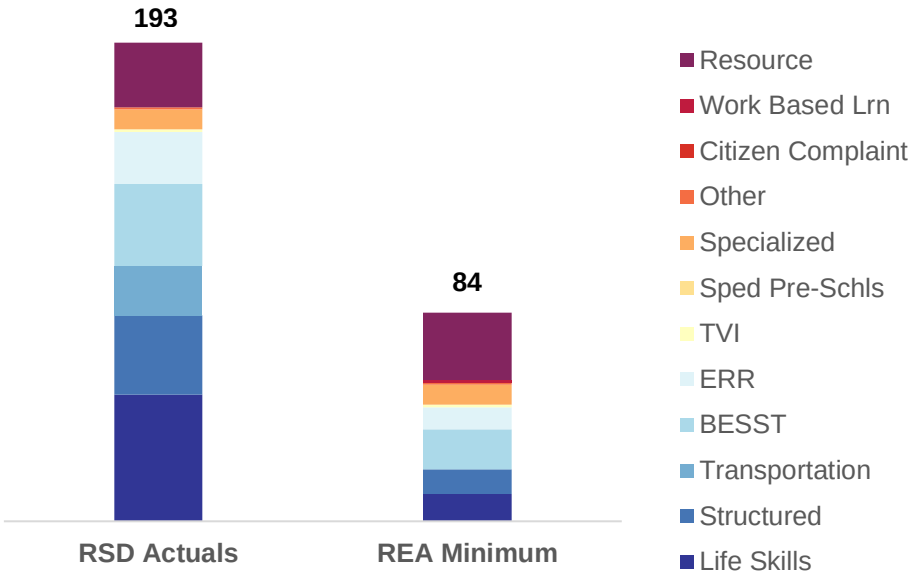
Examining human resource data, two findings are clear: (1) the use of paraprofessionals grew from the 2016-17 school year to the 2017-18 school year, and (2) RSD has more paraprofessionals than are required by the REA contract. To begin, as shown in Exhibit 21, the number of paraprofessional hours used increased from 969.20 to 1,957.75, equaling an increase of 88.6 paraprofessional hours. The largest increase (55.6 of the 88.6 hours) are paraprofessionals placed in resource programs.

**Exhibit 21. Paraprofessional hours**

| Program | FTE 16–17 | FTE 17–18 | Para Hours 16–17 | Para Hours 17–18 | Hours Variance |
|---|---|---|---|---|---|
| Transportation | 0.0 | 0.0 | 107.6 | 93.7 | -14.0 |
| Sped Pre-Schls | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| TVI | 0.5 | 0.5 | 7.6 | 7.6 | 0.0 |
| Work Based Lrn | 1.0 | 1.0 | 0.0 | 0.0 | 0.0 |
| Citizen Complaint | 0.0 | 0.0 | 0.0 | 2.4 | 2.4 |
| ERR | 9.0 | 9.0 | 114.7 | 117.1 | 2.4 |
| Other | 1.0 | 1.0 | 2.0 | 6.0 | 4.0 |
| Life Skills | 11.0 | 11.0 | 289.5 | 297.2 | 7.6 |
| BESST | 8.0 | 8.0 | 176.5 | 184.5 | 8.0 |
| Structured | 10.0 | 10.0 | 152.5 | 162.0 | 9.5 |
| Specialized | 0.0 | 0.0 | 33.1 | 46.1 | 13.0 |
| Resource | 16.5 | 24.3 | 85.7 | 141.3 | 55.6 |
| Totals | 57.0 | 64.8 | 969.2 | 1057.8 | 88.6 |

Continuing to analyze staffing data, the REA contract specifies the minimum number of paraprofessionals required in each special education program. That said, the district provides a much larger number of paraprofessionals than the REA requires. Exhibit 22 shows the difference between the number of paraprofessionals used in the district and the number required by REA. As shown, when totaled, REA requires 84 special education paraprofessionals, and the whole district employs 193 special education paraprofessionals, a difference of 109.

**Exhibit 22. Number of paraprofessionals in the district and number required by REA**



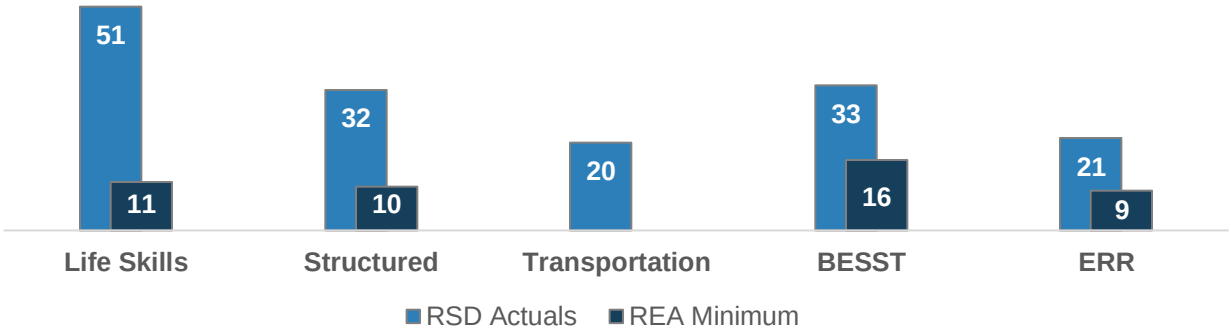

As evident from the chart above in Exhibit 22, there are 109 more paraprofessionals working in the district than the union minimum. As shown in Exhibit 23 below, there are two staffing types that are below the union minimum and five that are above the union minimum. The two staffing types that are below minimum are Resource and Work Based Learning, both understaffed by one. This underage is not deemed to be problematic as the underage is negligible. There are five staffing categories that do not have an overage or underage, although it should be noted that two of these five categories do not have a stated minimum.

**Exhibit 23. District Paraprofessional Staffing Levels vs. Union Minimums**

| | RSD Actuals | REA Minimum | Staff Overage | Percent Over Minimum |
|---|---|---|---|---|
| Resource | 26 | 27 | -1 | 96% |
| Work Based Lrn | 0 | 1 | -1 | n/a |
| Citizen Complaint | 0 | 0 | 0 | 0% |
| Other | 1 | 1 | 0 | 100% |
| Specialized | 8 | 8 | 0 | 100% |
| Sped Pre-Schls | 0 | 0 | 0 | 0% |
| TVI | 1 | 1 | 0 | 100% |
| ERR | 21 | 9 | 12 | 233% |
| BESST | 33 | 16 | 17 | 206% |
| Transportation | 20 | 0 | 20 | n/a |
| Structured | 32 | 10 | 22 | 320% |
| Life Skills | 51 | 11 | 40 | 464% |
| **Totals** | **193** | **84** | **109** | **230%** |

What needs to be addressed are the five staffing types that are above the union minimum where the overages range from 233% to 464%. Life Skills is the most over-saturated, with an REA Minimum of 11 and RSD Actual of 51. This is an overage of 40 staff persons and is 464% of the union minimum. Details of these staffing discrepancies can be found in the table below, Exhibit 24.

**Exhibit 24. District Paraprofessional Staffing Levels vs. Union Minimums by program**




When we asked how the hiring of paraprofessionals was justified and approved, we were given mixed answers. We were told the final approval for additional paraprofessionals was made by the Director of Special Education; however, other staff reported they were approved by the Assistant Superintendent(s). It was unclear how the process worked for either department, but in special education, a justification process was used, for which the team or teacher requesting this support had to justify, through data, the need for additional paraprofessional support. It was unclear how programmatic paraprofessionals were assigned to specific programs. Some programs for students in substantially separate classrooms had two classroom paraprofessionals, while other classrooms visited had up to five paraprofessionals. Since the district had few 1:1 paraprofessionals in the district, it was not clear if some of these staff were 1:1 or if student need dictated the discrepancy in numbers across schools and programs.

> *Recommendation 12: Develop district guidance, processes, and systems of oversight to decide when the use of a paraprofessional is appropriate and how the paraprofessional will provide services.*

Based on a review of the data, classroom observations, feedback from focus groups, and a review of the roles and responsibilities of paraprofessionals throughout the district, there appears to be an overreliance on paraprofessional support. We recognize that the use of paraprofessionals is done with positive intentions and, understand paraprofessionals are often assigned with the intention of supporting a variety of areas, including assisting students with disabilities, supporting the work of classroom teachers and special educators, and being responsive to requests from parents. While we understand trained and supervised paraprofessionals serve an important need in some areas, this seemingly logical solution can lead to a dilemma at both the school and district level. This does not mean that paraprofessionals are the problem. We recognize this dedicated workforce is often underappreciated in school systems. However, we also recognize that an overreliance on

paraprofessionals is often indicative of underlying systemic issues (Giangreco, Smith & Pickney, 2006).

One of the most common responses to the needs of students with disabilities has been to hire more paraprofessionals. Requests for more paraprofessionals have led to increases in their use "despite the absence of supportive data or a sound theoretical basis for assigning the least qualified, often inadequately supervised personnel to students with the most complex learning characteristics" (Giangreco, Smith & Pickney, 2006 p. 362). Assigning paraprofessionals is further complicated because this level of support is positively perceived by teachers, despite its ineffectiveness for students (Giangreco, Smith & Pickney, 2006). In addition to a lack of evidence for student gains when provided paraprofessional support, unintended detrimental effects associated with the overreliance on paraprofessional support include unnecessary dependence on adult support, interference with teacher engagement, limited access to competent instruction, interference with peer interactions, and stigmatization (Giangreco, Smith & Pickney, 2006).

It is important for districts to recognize that requests for paraprofessionals as a way to get more support may be the only method teachers know, despite this request not addressing the root concern. Therefore, it is important for the district to understand the underlying issues of why general and special education staff are requesting this additional level of support. This does not mean paraprofessionals do not have a valued place in schools—we believe they do. However, their support should be used judiciously. When used appropriately, paraprofessionals can assist staff in supplemental, teacher-planned instruction and by undertaking roles that will allow teachers more time to work directly with students and collaborate with each other (Giangreco, Smith & Pickney, 2006). Therefore, we are not recommending the district simply reduce the number of paraprofessional as a solution, but rather investigate the root cause for the request, which is often an unaddressed need that is perpetuated by additional paraprofessional support. Contributing factors to these requests could be an increase in the level of need for students in the classroom, resource allocation, teacher class size, and/or caseload. While these challenges are vast, and we are not recommending they be ignored, we are recommending that Central Office staff identify the root cause and explore alternatives to hiring paraprofessionals to support this need. For example, alternatives could include increased teacher engagement, peer supports, co-teaching, multilevel instruction, or assistive technology (Giangreco, Smith & Pickney, 2006).

Rather than continuing to use a justification system, where the Director of Special Education is tasked with reviewing the request for a paraprofessional through teacher-submitted data justifying the request, we recommend the district develop guiding principles regarding educational supports (Giangreco, Smith & Pickney, 2006). Using the tool *Guidelines for Selecting Alternatives for Overreliance on Paraprofessionals*, we recommend the district consider the following (Giangreco, Smith & Pickney, 2006):

- All students with disabilities deserve access to, and their primary instruction from, highly qualified teachers and special educators.
- Support services should be both educationally relevant and necessary.
- Support services should address identified education needs while being only-as-specialized-as-necessary (e.g., the least restrictive support option).
- Teams should explore natural supports (e.g., general education supports and peer supports) before considering more restrictive supports, especially considering a 1:1 paraprofessional.

- Students with disabilities should have a voice in determining their own supports.
- In situations where paraprofessionals are used, they must be adequately trained, have appropriate roles, (e.g., implementing teacher-planned supplemental instruction, not to be expected to make pedagogical decisions) and be adequately supervised.
- Schools should avoid unhelpful double standards whereby students with disabilities receive supports in ways that would be unacceptable for students without disabilities (e.g., receiving primary instruction from a paraprofessional instead of a highly qualified educator).
- If a 1:1 paraprofessional is assigned as a temporary measure, plans are established to evaluate its impact and fade the supports as much and as soon as possible to encourage student independence.

Two states provide their LEAs with guidance on the use of paraprofessionals We believe that these documents may help guide Richland's appropriate use of paraprofessionals:

- New York State Guidance
- Massachusetts' Guidance

Giangreco, Smith, and Pickney (2006) note the following, which we believe the district should take into consideration based on our recommendations:

> It is worth reiterating that ethically and conceptually sound paraprofessionals can continue to play a valued support role in schools for students with and without disabilities so long as school leaders ensure paraprofessionals (a) engage in appropriate roles (e.g., provide supplemental, teacher-planned instruction, facilitate peer interactions, engage non-instructional roles resulting in more opportunities for students with disabilities to receive instruction from highly qualified teachers and special educators); (b) are sufficiently and continually trained for the appropriate roles they are asked to undertake; (c) explicitly are not asked to undertake inappropriate roles (e.g. provide the bulk of instruction or primary instruction, serve as the school's liaison with the family, make pedagogical decisions, plan lessons or adapt curriculum); (d) are adequately supervised on an ongoing basis to ensure fidelity of instruction and other supports. In part, this means the ratio of professionals to paraprofessionals must be small enough and mechanisms established to allow for adequate training and supervision of paraprofessionals by licensed educators. Utilizing paraprofessionals without adequate training and supervision is not only problematic, it may constitute a violation of the free, appropriate, public education act (FAPE) provisions of the IDEA.

***Observation 13: School Culture***

> ***Many staff expressed feeling overwhelmed, underprepared, and unclear in their charge to address the needs of students with disabilities.***

Interviews with teachers and school leaders surfaced sentiments of feeling overwhelmed and underprepared to address the challenges experienced in schools. Staff reported that new initiatives and changes to practice without guidance or support from the district was the biggest contributing factor. This has led to some dissension among staff, educator burnout, and a lack of self-efficacy. Presently, there is not a consistent forum for teachers and principals to give feedback on special education policies and procedures. Frequently, we heard from staff and families how this practice diminished their identity as professionals. There were numerous concerns that there is not enough transparency

about the rationale for decisions. While evidence of accountability had increased, it had done so in the absence of a system of supports. Further, there were parents who expressed their frustrations in the relationships they had with school staff and wanted more transparency, collaboration, and communication. These findings directly impact the culture of the schools and might be hindering improvements in practice.

> *Recommendation 13: Develop an internal working group of special education staff across all building levels to meet regularly with the special education central office team to work collaboratively on providing supports and services, as well as designing internal and external communication structures to increase transparency and strengthen partnerships with parents and community.*

To support the development of a positive culture concerning the provision of special education in schools, the district could develop a task force with special education staff across all building levels that meets regularly with the special education central office team to work collaboratively while thinking through new initiatives. The central office team might also develop a yearly climate survey to provide anonymous feedback.

To support relationships with families, the district could launch a special education advisory council to ensure that parents meet regularly with district officials; participate in workshops and activities; as well as participate in the planning, development, and evaluation of the district's special education supports and services. This group could support further development of internal and external communication structures to increase transparency and strengthen partnerships among parents, schools, and community. The district might also provide access to evidence-based resources and tools, information to deepen understanding of their child's disability, strategies to advocate for their child, and different vehicles to share concerns and questions with district personnel. The district could also partner with social services to provide resources to families within the school such as family counseling services, mental health supports, and welfare services.

***Observation 14: Professional Development***

> ***Staff are not consistently supported with the needed professional development to provide access to the general education curriculum and specially designed instruction.***

As discussed, what supports and services are provided by special education services will need to be better articulated, and with that, there will be a need to develop a plan for supporting the professional development of special education staff. Complicating such an initiative will be the barriers to time needed to provide professional development, as articulated by the Richland Education Association (REA) contract. No matter, staff will need professional development in the areas of accessing the curriculum and specially designed instruction.

> *Recommendation 14: Provide training to ensure that special education staff are adept at providing accommodations and modifications for students to access the general education curriculum no matter their skill level and specially designed instruction to work on developing students' skills.*

Richland must create a professional development plan to support the district's vision for special education. The plan should be designed with both professional learning experiences and job-embedded support for special education teachers and paraprofessionals and can include trainings as well as online and physical resources and toolkits.

The development of educators' instructional skills must include a focus on professional learning activities and resources to implement core instructional programs. There is a need to ensure that special education staff are adept at providing specially designed instruction to work on developing students' skills and benchmarks to drive instruction and measure student growth. The plan must include supports on how to provide direct and indirect supports, including the consultation model combined with a strong collaborative and co-teaching model.

***Observation 15: Social-Emotional Learning Standards/Mental Health Supports***

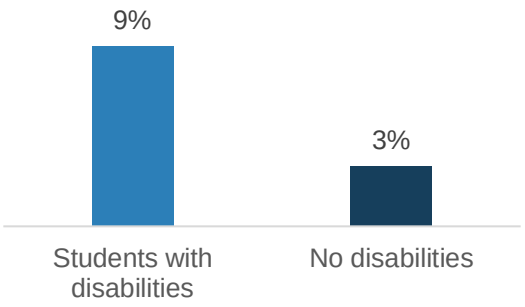
***RSD does not have a districtwide instructional focus or a plan to integrate social-emotional learning standards into the district's ongoing initiatives. In addition, the district is lacking mental health supports or an adequate number of personnel trained in addressing the complex needs of students who require more intensive wraparound supports.***

Students' academic performance is enhanced when districts are able to proactively address their social-emotional learning needs. Social-emotional learning integrated throughout the instructional day has been shown to create a positive school climate that has impact on the academic achievement and personal development with all students. Schools have reported fewer instances of aggression and emotional distress, increases in exhibiting positive behaviors, and a stronger ability to navigate difficult situations effectively. For students who have been impacted by traumatic experiences that have altered their ability to cope or self-regulate their emotions, an array of mental health supports might be appropriate.

Examining RSD's core social emotional learning supports and tiered supports including mental health services, we found that while individual schools do have some behavioral supports, district-wide, Richland does not currently have a systemic approach to implementing evidence-based practices that focus on creating a positive school climate that uses social emotional-learning standards and quality instruction that enables students to improve social and emotional competencies. The district should focus on making SEL a priority through its policies, professional development, and standards to support teachers and administrators with integrating SEL in core instructional activities. Staff interviews and focus groups across grade level and program surfaced teachers feeling overwhelmed by general and special education student behaviors. Across classrooms, teachers stated misconceptions regarding behavioral goals listed in a student's IEP. Many assume it is the sole responsibility of the special education teacher to design, implement and monitor. It is imperative that all teachers and staff have adequate access to the vision and training to support approaches for SEL. We were also informed that in the community, there is a dearth of mental health options, with Lord's Clinic and Community's in Schools the two that are used. These finding are in-line with Observation and Recommendation 2 concerning RSD's RTI/MTSS process that must be developed with a focus on social emotional standards as well as academic standards.

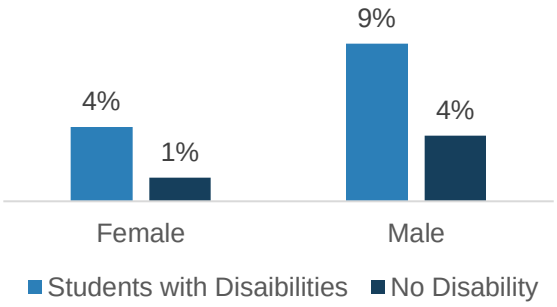
One indicator of how well social-emotional standards and tiered supports are working to support students with disabilities, is the occurrence of student suspensions. Looking specifically at the differences in suspension between students with and those without disabilities, we see in Exhibit 25, suspension rates are higher for students with disabilities (9%) than they are for students without disabilities (3%).

**Exhibit 25. Suspension rates**



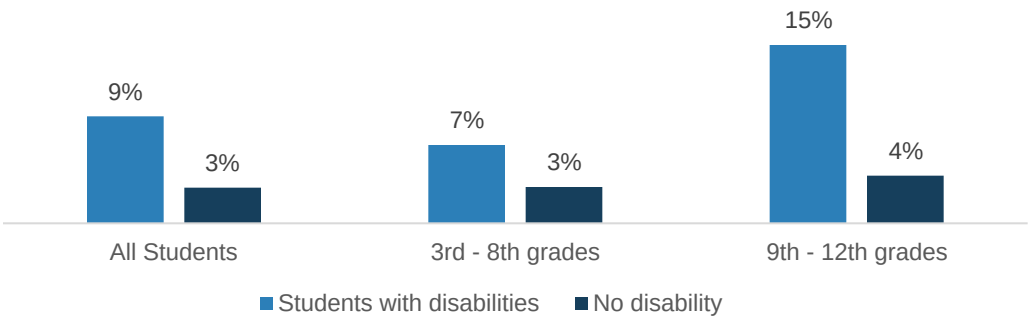

Further disaggregating the data by gender, Exhibit 26 shows that whether a student has a disability or not, boys have a higher percentage of suspensions than girls, however, the percentage of suspensions among boys with disabilities is more than double that of their peers.

**Exhibit 26. Suspension percentages, boys and girls**



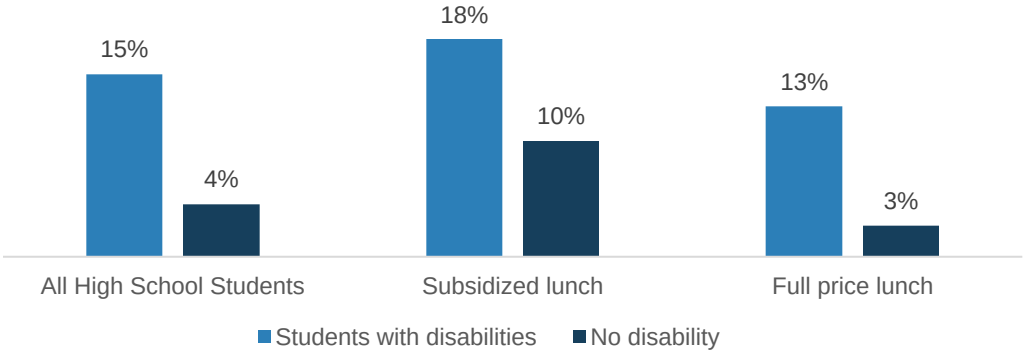

Disaggregating these data by grade span, the percentage of suspensions for students without a disability increases a bit in the high school (3% to 4%); however, for students with disabilities in high school, the increase is substantial (from 7% to 15%). See Exhibit 27.

**Exhibit 27. Suspension percentages, students with a disability and students without a disability**



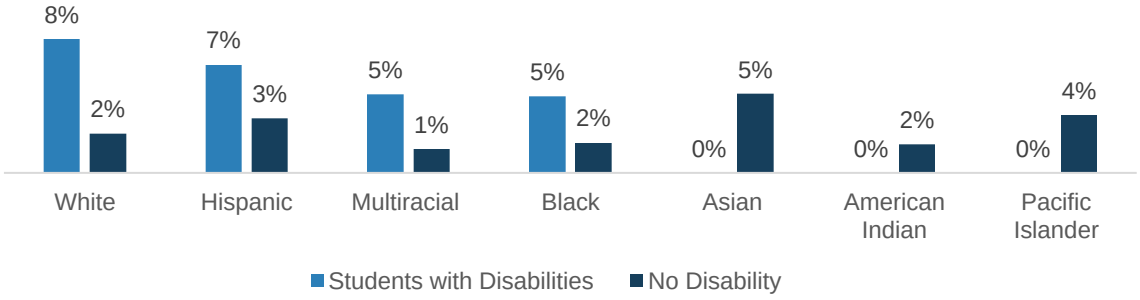

Disaggregating these high school data further by subsidized lunch status, as shown in Exhibit 28, it is clear that the percentage of suspensions for students with disabilities is higher than those without a disability (15% vs. 4%), and this gap remains whether or not students have subsidized lunch (18% vs. 10%) or pay full price (13% vs. 3%).

**Exhibit 28. Suspension among high school students with disabilities, by subsidized lunch status**



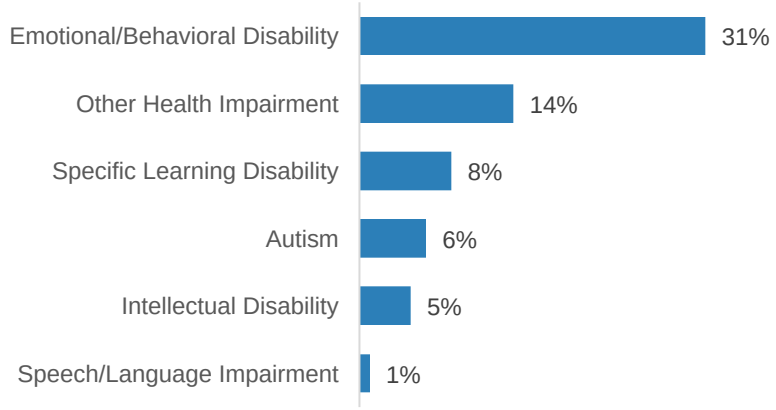

Two final pieces of disaggregated data include looking at the suspension of students with disabilities by disability category and by race. As shown in Exhibit 29, in all of the predominant racial groups enrolled in Richland (White, Hispanic, multiracial, and Black), students with disabilities are more likely to be suspended than their peers without disabilities.

**Exhibit 29. Suspension Rates by Race and Disability Status**



When examining suspensions by disability category, as shown in Exhibit 30, students classified with an emotional/behavioral disability have a much higher percentage of suspensions (31%) than students in all other categories (OHI-14%, SLD-8%, ASD-6%, ID-5%, Sp/L-1%).

**Exhibit 30. Percentage of suspensions by disability category**




One finding threads through these data, that is, students with disabilities in RSD are suspended at higher percentages than their peers without disabilities. The practice increases if the student is a boy, is in the upper grades, if they receive subsidized lunch, and if they are classified with an emotional/behavioral disability.

In addition to suspensions, we examined data and spoke with various stakeholders about restraint and isolation. As shown in Exhibit 31, during the 2016-17 school year, RSD data showed a substantive number of restraint (229) and isolation (674) incidents. Examining these data further, it is clear that the large number of restraints and isolations occurred to a much smaller number of students (42 students received 229 restraints and 45 students received 674 incidents of isolation. Examining these data within schools, it is clear that the majority of restraints occurred at Lewis & Clark (92), Tapteal (50), Chief Joseph (26) and Sacajawea (23) and the majority of isolations occurred at Orchard (284). Lewis & Clark (145), Sacajawea (98), and Chief Joseph (83), however, in none of these cases did the restraint or isolation happen to more than 10 students in the school. Further, the Behavior Education and Social Skills Training Classes (BESST) program for students with behavioral disabilities are housed at Lewis & Clark, Sacajawea, and Chief Joseph, so this might not be a surprising finding.

No matter, restraint and isolation should only be used in extreme circumstances, or as OSPI states, only when "reasonably necessary to control spontaneous behavior that poses an imminent likelihood of serious harm, as defined in RCW 70.96B.010." RSD's data shows that for the 2016-17 school year, a small number of students received a large number of restraints and placed in isolation areas. We were told in interviews focus groups that students in the BESST program did receive a large number of restraints and isolation in part because staff did not know what else to do with some of the behaviors. We were also informed that for students with Autism, there might be the alternative of sensory stimulation to help regulate behaviors, however, this was not available to students in the BESST program.

**Exhibit 31. OSPI School Safety Data Report**

| OSPI School Safety Center Data Report 2016-2017 | Students Restrained | Restraint Incidents | Students Injured While Restrained | Staff Injured While Restraining | Students Isolated | Isolation Incidents | Students Injured While Isolated | Staff Injured While Isolating |
|---|---|---|---|---|---|---|---|---|
| Badger Mountain Elem | 2 | 3 | 0 | 1 | 2 | 14 | 0 | 4 |
| Carmichael Middle | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Chief Joseph Middle | 3 | 26 | 0 | 0 | 4 | 83 | 2 | 2 |
| Enterprise Middle | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Hanford High | 4 | 5 | 0 | 2 | 1 | 2 | 0 | 1 |
| Jason Lee Elem | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Jefferson Elem | 1 | 1 | 0 | 0 | 1 | 1 | 0 | 0 |
| Leona Libby Middle | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Lewis & Clark Elem | 8 | 92 | 0 | 2 | 8 | 145 | 0 | 2 |
| Marcus Whitman Elem | 0 | 0 | 0 | 0 | 2 | 4 | 0 | 0 |
| Orchard Elem | 6 | 21 | 0 | 0 | 8 | 284 | 0 | 1 |
| Richland High | 2 | 4 | 0 | 0 | 2 | 9 | 0 | 2 |
| Rivers Edge High | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Sacajawea Elem | 9 | 23 | 0 | 1 | 10 | 98 | 7 | 5 |
| Special Programs | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Tapteal Elem | 3 | 50 | 0 | 0 | 1 | 8 | 0 | 0 |
| Three Rivers Home | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Twin Rivers Group | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| White Bluffs Elem | 1 | 1 | 0 | 0 | 3 | 9 | 0 | 0 |
| William Wiley Elem | 2 | 2 | 0 | 0 | 3 | 17 | 0 | 0 |
| **TOTAL** | *42* | *229* | *0* | *6* | *45* | *674* | *9* | *17* |

*Recommendation 15: Adopt and implement districtwide social-emotional standards and positive behavioral supports, with mental health supports and community partnerships, changing the perspective to look at negative behaviors as lagging skills rather than purposeful actions. In addition, repurpose all isolation rooms to use for other functions, with the ability to have some space in school for students to decompress in a safe space with structured support and options for sensory integration.*

According to the Collaborative for Academic, Social, and Emotional Learning (CASEL), social and emotional learning is "the process through which children and adults acquire and effectively apply the knowledge, attitudes, and skills necessary to understand and manage emotions, set and achieve positive goals, feel and show empathy for others, establish and maintain positive relationships, and make responsible decisions" (CASEL, 2018). A recent meta-analysis of 213 programs found that students with access to social and emotional learning interventions increased academic performance by 11 percentile points, as compared to students who did not have access to or participate in similar programs (Durlak et al., 2011). Students with social-emotional learning integrated throughout their instructional day demonstrated fewer instances of aggression and emotional distress among students. Educators also noted an increase in positive behaviors, including recognizing and managing emotions, developing concern for others, engaging more in school, and acquiring a growth-mindset disposition.

Effective integration of social and emotional learning must leverage a whole-school approach through culture and climate, classroom practices, and strong relationships between students and adults. By doing so, schools will help students develop the five core competencies of social-emotional learning: self-awareness, self-management, social awareness, relationship skills, and responsible decision-making.

Studies also show that one in five children in the United States shows signs of a mental health disorder (Anderson, 2016). Children can experience a range of disorders, including attention deficit hyperactivity disorder, conduct disorder, bipolar, anxiety, or an eating disorder. In 2017, national statistics of children hospitalized for suicidal ideation or actions doubled from a decade ago. Teachers are often the first staff members to observe these behaviors in students; however, without proper training, resources, and a specialized staff member in the district, teachers are underprepared to address these challenges.

*Recommendation 15a*
We suggest as part of the MTSS work, the district create a cross-departmental team to develop a SEL program that focuses on specific skill instruction, identifies instructional practices, integrates with academic curriculum areas, and aligns to organizational strategies (CASEL, 2018). Consider having the district adopt and implement social emotional standards and positive behavioral supports, changing the perspective to look at negative behaviors as lagging skills rather than purposeful actions. Also consider creating districtwide SEL specialists at each level – 2 at elementary, 1 middle school and 1 high school – to support staff at the building level. Staff can model best practices, provide professional development and support behavior planning for individual students.

*Recommendation 15b*
Integrate mental health into the school curriculum and professional development plan to increase understanding and reduce stigma and negative stereotypes (Page, 2017). Develop a plan for counseling and/or clinical services to support every BESST program in the district. Develop partnerships to create wraparound services with existing local outside community agencies (Lord's, Communities in Schools, etc.). Design alternatives to replace isolation rooms. For example, repurpose isolation rooms into sensory rooms to allow students to decompress in a safe space with structured support.

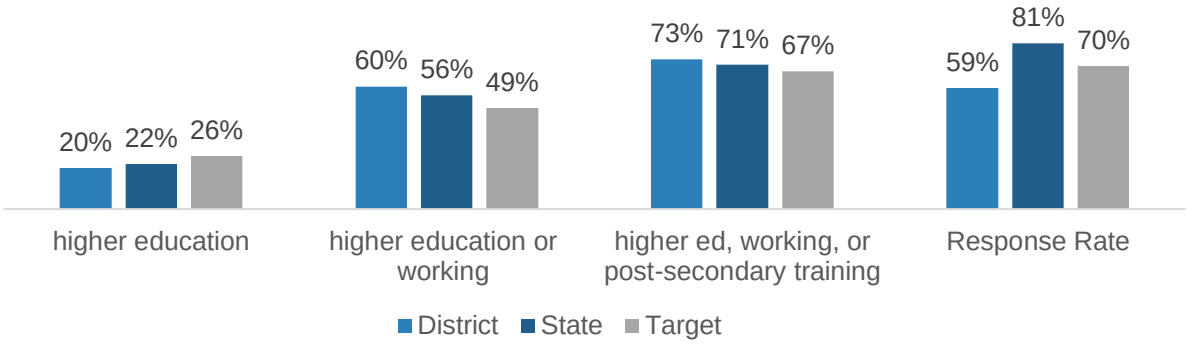
*Recommendation 15b*
Repurpose all isolation rooms to use for other functions, with the ability to have some space in school for students to decompress in a safe space with structured support and options for sensory integration. Creating clear criteria for schools to use if restraint and isolation are needed. For students who require the use of restraint or isolation as a behavior intervention, the school should develop a comprehensive plan for students and staff. For students, the plan should address specific skill building strategies and alternative consequence strategies for students who demonstrate disruptive behavior. For staff, there needs to be a stronger emphasis on identifying situations that have the potential of inflicting serious harm on the student or staff. In addition, tighter definitions and parameters as to what isolation, restraint, and restraint devices are and the appropriate application of each is needed.

***Observation 16: Transition Planning***

***Richland School District comes close to or exceeds state transition rates and targets for students enrolling in higher education, working, or in postsecondary training. The district currently has some strong transition supports and services; however, the majority of students are not able to take advantage of these programs, and the number of students with successful postsecondary outcomes has declined in the district.***

State-reported data examining transition rates and targets for students enrolling in higher education, working, or in postsecondary training shows RSD meeting or exceeding expectations. Exhibit 32 shows these data.

**Exhibit 32. Percent of youth with IEPs who enrolled in higher education within 1 year[28]**




However, during our interviews, we were told that services and outcomes had declined. Examining longitudinal data, specifically looking at rates of enrollment in higher education, we see a remarkable decline; the district is currently at 20% enrollment of students with disabilities in higher education, and in 2012, the rate was 64%. This observation aligns with previous findings related to the need for increased academic outcomes.

The district was clear that they believed they do have a few strong transition programs for students with significant disabilities. These programs have been shown to be effective, but the district has limited spaces, and the student needs exceed program capacity. It is critical that the district offers a continuum of transition supports for all students in planning for postsecondary outcomes. Currently, the district has a strong transition program that is tailored to their high-functioning Life Skills students. We were told this program is largely dependent on building partnerships with community businesses, so the school must ensure the students they send to these worksites are able to fulfill their responsibilities so businesses continue to partner with the school district. However, it was noted that

[28] ***District, State, and Target***: OSPI Special Education, Data included in the FFY 2015 APR "14. Percent of youth who had IEPs, are no longer in secondary school, had IEPs in effect at the time they left school and were: A. Enrolled in higher education within one year of leaving high school. B. Enrolled in higher education or competitively employed within one year of leaving high school. C. Enrolled in higher education or in some other post secondary education or training program; or competitively employment within one year of leaving high school. (engagement rate). N/A-no leavers for the school year being reported or no leavers for that particular category," from Washington State Special Education Performance Data – Richland District 2014–2015

because of this, the program only serves a small population of students who meet specific criteria. At present, there are 25 students enrolled in this program.

The district is also a partner with several area school districts for seats that were available at an collaborative school called the Tri-Tech Skills Center in Kennewick, WA. This program serves 11th and 12th grade students who can immerse themselves into a variety of technical careers. Students with disabilities can attend this school; however, since seven other school districts also enroll students, there is limited space available to each district. The district provides transportation to the Skills Center for students who are accepted. It was noted that culinary and welding programs were in high demand at this school, and there is a waitlist of students hoping to attend.

The district also offers a program called Running Start, which allows students to attend college courses in high school; however, it was unclear whether students with disabilities were enrolled in this program.

Based on our conversations with Central Office staff, they recognize the need for more programs and opportunities for students to prepare them for life after high school. The district's Special Education Office had done a review of postsecondary outcomes for their students and were disappointed in the outcomes for students with disabilities. Furthermore, the leaders we spoke to recognized the need to create more professional development opportunities and better training to support teachers in developing transition plans and supports that would lead to better outcomes for students. The staff we spoke to were hoping to expand their transition options to more students so that multiple programs would be available to students. In discussions with staff, it was clear the special education department is trying to think of new, innovative work-based programs in collaboration with the career and technical education staff. Currently, the staff overseeing the transition program in the district is highly respected and has done an excellent job developing the program to support students at a variety of work-based sites. Some Central Office staff have identified the need to place a stronger emphasis on transition planning that supports the development of real-world skills for students who will go into the workforce after high school. The transition plan should prepare students for further education, employment, and independent living. Transition planning is a coordinated set of focused initiatives for improving the academic and functional achievement of students with disabilities to support the students' movement from school to postsecondary activities (Philbin, 2009).

> *Recommendation 16: Develop programs, partnerships, and processes that support all students who remain in the district until the age 22, using the current effective program as a model.*

It is recommended the district review their current transition programs and begin to develop a continuum of transition supports for all students. Ideally, this should include a review of the current transition plans for students to ensure they are written to appropriately address each student's unique needs and postsecondary interests. This will provide the special education department the opportunity to gather information about their students as they work to develop opportunities based on level of need and interest.

This work should include a critical lens of current programming and review of what other districts across the state and country are offering for transition opportunities. There are many districts that have developed strong transition programs for students with disabilities, one of which, is Spokane Public Schools. Furthermore, the Center for Change in Transition Services (CCTS), out of Washington

University, could be used as a resource in this work. In developing a strong transition program, we recommend Richland School District consider the following:

- Develop programs that support all students who remain in the district until the age 22. Use the current program as a model, making sure to include academic and vocational skills development.
- Visit other school districts that have a strong transition program and determine if there is a way to partner with neighboring districts to support transition programming.
- Develop partnerships with local universities and community colleges to see what opportunities are available to students with disabilities at the college level. One example is the Inclusive Concurrent Enrollment Initiative (ICEI) program that is grant-funded in Massachusetts and gives students with intellectual disabilities the chance to attend college and experience campus life.
- Develop a family-friendly transition protocol for students and families to understand their options, when appropriate, to remain in school until the age of 22. This would include a variety of programs in which students could develop real-world skills to prepare for gainful employment and self-sufficiency upon leaving school.
- Identify internships to foster personal growth and help students acquire real-world skills in an authentic work environment
- Develop resources and tools to engage families as partners in developing and implementing transitional services.

***Observation 17: Assistive Technology***

***The district does not have a dedicated team that can support staff with evaluating, procuring, and implementing effective assistive technologies.***

The district does not have a dedicated team that can support staff with assistive technology. Currently speech-language pathologists (SLP) work to support assistive technology (AT), but it is not enough and not fully effective. The process for acquiring AT for students is not clear, and the district does not have the staff to conduct AT evaluations for students who may need these supports.

Currently, the district does not have a dedicated team to ensure that students with disabilities are being screened for AT services. *Assistive technology* is defined as "any item, piece of equipment, software program or product system that is used to increase, maintain, or improve the functional capabilities of persons with disabilities" (Assistive Technology Industry Association, 2018). If appropriate, AT can support exceptional learners who struggle with reading, writing, various mathematical tasks, or executive functioning difficulties. AT can bridge the gap for students enabling them to access to grade-level curriculum and different resources, collaborate with others, and perform academic tasks independently (Burgstahler, 2006). AT can range from simple adaptive tools, such as highlighters and organizers, to more complex resources, such as text-to-speech software.

*Recommendation 17: Dedicate at least one person in special education to oversee assistive technology, including providing staff training, procurement, and inventory, and train a team of staff that can conduct evaluations for the effective use of assistive technology.*

We suggest that the district dedicate at least one person in special education to provide oversight of AT, which would include providing training to staff, keeping an inventory of AT and applications available, conducting classroom visits to show staff how to appropriately use devices, etc. This person can be responsible for designing an evaluation and decision-making process to determine a student's AT needs as well as building and training a team of specialists that can conduct AT evaluations.

***Observation 18: Extended School Year***

***Richland has a process in place for deciding whether students require extended school year (ESY) services; however, the process requires documentation of actual regression, rather than the likelihood of regression.***

The district currently offers an extended school year (ESY) for students who meet specific regression criteria. The district does not offer extended school year programming as a continuation of a student's school day. Based on our conversations with staff and families, it is very difficult to receive ESY services through Richland School District. Many families reported that they felt they had to "fight for these services" or "threaten with legal action" before the district would provide ESY services to their child.

When we talked to district staff, they explained they had a process that determined whether students qualified for ESY. This process included documentation that regression had occurred over the summer break or during school breaks throughout the school year. Without this documentation, the district would hesitate to recommend ESY services. The district believed this process was equitable and data-driven so that students who truly needed these additional services to prevent regression received them.

It was clear, based on our discussions with all stakeholders, that ESY was a source of frustration and confusion for many. OSPI's Rules for the Provision of Special Education note the following with regards to providing ESY:

**WAC 392-172A-02020 Extended school year services.** (1) Extended school year services mean services meeting state standards contained in this chapter that are provided to a student eligible for special education:

(a) Beyond the normal school year;
(b) In accordance with the student's IEP;
(c) Are provided at no cost to the parents of the student.

(2) School districts must ensure that extended school year services are available when necessary to provide a FAPE to a student eligible for special education services.
(3) Extended school year services should be provided only if the student's IEP team determines on an individual basis that the services are necessary for the provision of FAPE to the student.
(4) A school district may not limit extended year services to particular categories of disability or unilaterally limit the type, amount or duration of those services.
(5) The purpose of extended year services is the maintenance of the student's learning skills or behavior, not the teaching of new skills or behavior.
(6) School districts must develop criteria for determining the need for extended school year services that include regression and recoupment time based on documented evidence, or on the determinations of the IEP team, based on the professional judgement of the team and

consideration of factors including the nature and severity of the student's disability, rate of progress, and emerging skills, with evidence to support the need.

(7) For purposes of subsection (6) of this section:

(a) Regression means significant loss of skills or behaviors if educational services are interrupted in any area specified on the IEP;

(b) Recoupment means the recovery of skills or behaviors to a level demonstrated before interruption of services specified on the IEP.

This information from OSPI provides clear guidance on how IEP teams should consider ESY services for students with disabilities and can support the work the district wants to do in determining if students qualify for ESY.

> *Recommendation 18: In keeping with the legal criteria and intent of ESY, the "likelihood of regression [and] slow recoupment" are acceptable reasons for determining that a student receive ESY and further, "showing of actual regression is not required to find a child eligible for ESY," Richland should consider including more flexibility in how ESY decisions are made. (See Department of Education Opinion Letter.)*

Based on the information provided above from OSPI, we recommend the special education department look at how their current ESY services are determined and provided. It seems there are only a small number of students across the district that qualify for ESY and the services are very minimal. In our conversations with families and staff, we were told it could range anywhere from 1–4 hours per week of related services. Parents felt this was not enough to provide meaningful benefit and recoupment of skills lost over the summer.

While we do agree with the district's data-driven approach as one way to determine if students qualify for ESY, we also encourage the district to think about other processes to consider when making these decisions. There are many districts that offer ESY to students who qualify as an extension of the school day. For example, students who struggle with social skills or daily living skills benefit from having a consistent routine and structure in addition to constant repetition of these skills in order to make meaningful gains. Other students with significant reading deficits can benefit from attending a program to ensure they do not lose the skills taught to them during the year and ensure these skills are continually reinforced so that students can make necessary gains as they come into the next school without regression of foundational skills taught.

We recommend the district use this as a topic for one of their parent meetings, so that parents understand what ESY is and how students qualify for ESY. While we recommend the district offer more flexibility when determining ESY services, we also encourage the district to explain to parents that ESY is not a different form of summer school, summer remedial classes, or summer enrichment programming. It is also not based on disability category; for example, not all students who have autism spectrum disorders or intellectual impairments automatically qualify for ESY services. ESY isn't guaranteed for all students who have IEPs. It is important for IEPs teams to focus on two critical questions when making determinations about ESY [29]:

[29] https://www.understood.org/en/friends-feelings/child-social-situations/summer-camp-summer-school/extended-school-year-services-what-you-need-to-know

(1) Will the student lose critical skills without continued support and teaching?
(2) Will it take a long time for the student to regain those skills—longer than it would take a child without a disability?

We feel that by looking closely at the current ESY services delivery, the district may find there are more opportunities to expand their programming and reach more students who may require these supports in order to make progress in school.

# SECTION E: APPENDICES

*Appendix A: Team Members*

**Lauren Katzman, Ed.D.** is the Executive Director of the Urban Special Education Leadership Collaborative. Prior to this work, she served as the Assistant to the Superintendent for Special Education Services for the Newark Public Schools and the Executive Director of Special Education in the New York City Department of Education. In both of these positions, she developed and led significant reform efforts, increasing academic achievement, inclusive educational and experiential options, reliable data management, and statutory/regulatory compliance. She worked to develop strong interdisciplinary partnerships between districts, states, universities, advocacy groups, and communities to build the foundation for deep and sustaining systemic reforms. Prior to these two high-level and demanding school district leadership positions, Dr. Katzman served as Associate Professor of Special Education at Boston University and co-authored the book Effective Inclusive Schools: Effective Inclusive Schools: Designing Successful Schoolwide Programs with Dr. Thomas Hehir, former Director of the Office of Special Education Programs at the U.S. Department of Education. She was also a special education teacher for 14 years in St. Louis, New Jersey, and New York City and has conducted program evaluations of the special education services for the District of Columbia Public Schools, the state of Massachusetts, Ithaca Public Schools, and the New York City Department of Education.

**Jennifer Baribeau, Ph.D.** currently serves as the Special Education Supervisor for Springfield Public Schools, the second largest urban district in New England. Prior to this work, Dr. Baribeau was the Interim Director of Special Education for Holyoke Public Schools and previously Director of Student Support Services for a start-up charter school. In these various leadership roles, Dr. Baribeau led program management and reform and developed policies and practices to support special education students at the district level. She has a B.S. in Business Management and received her M.Ed. and Ph.D. in Special Education from the University of Massachusetts. She previously served on a task force working towards developing best practices for assessing and identifying English Language Learners with disabilities and served on the board for the Massachusetts Council for Exceptional Children. Prior to her leadership roles in special education, Dr. Baribeau managed several grant-funded projects for gang- involved and emotionally disturbed youth in Massachusetts and co-taught graduate courses in Special Education at the University of Massachusetts, Harvard Graduate School of Education, and Springfield College. Her current research is focused on issues with enrollment, placement and compliance in special education for both traditional public schools and charter schools.

**Alexis Morgan, Ed.L.D.** is currently the Assistant Superintendent for Student Services for the Cambridge Publicv Schools in Massachusetts. Alexis has spent the past 10 years advocating for students with disabilities. She began her career as a special education teacher, before joining the New Jersey Department of Education as a State Interventionist/Special Education Specialist. Most recently she served in the role of Executive Director of Instructional Supports for the Office of Special Education for The Newark Public Schools in Newark, NJ where she lead a reform to decrease the number of students in separate settings. Alexis believes that because some students have a different

starting place in life, it is up to school leaders and education policy makers to ensure that educators achieve equity before they can strive for equality.

*Appendix B: Interviewee Roles*

- Superintendent
- Deputy Superintendent
- Executive Director of Special Education
- Director of Special Education
- Assistant Director of Special Education
- Assistant Superintendent of Instruction & Secondary Education
- Assistant Superintendent of K-5 & Assessment
- Executive Director of Teaching and Learning team
- CTE Director
- District Assessment Coordinator
- State & Federal Programs & English Language Learners
- Transportation
- Director of Finance and Special Education Fiscal Analyst
- Executive Director of Human Resources
- Elementary Principals
- Secondary Principals
- Elementary General Education Teachers
- Secondary General Education Teachers
- Secondary Special Education Teachers
- Elementary Special Education Teachers
- Paraprofessionals
- Speech and Language Pathologists
- Psychologists
- Occupational Therapists/Physical Therapists
- Parents
- School Board member

*Appendix C: Summary of Observations and Recommendations*

# OVERARCHING STRENGTHS

- Overarching Strength 1. The district has a wealth of knowledge, community backing, and a supportive School Board that is dedicated to making special education services the most effective they can be for their students.
- Overarching Strength 2. The district has placed a strong emphasis on closing the achievement gap between students living in poverty and those in higher socioeconomic (SES) ranges by creating school improvement plans and professional development that address core academics, suspension rates, attendance, and graduation rates for all students.
- Overarching Strength 3. The district employs staff that are highly qualified and who work diligently to provide the best education to their students.
- Overarching Strength 4. The district takes seriously issues raised in audits and citizen complaints and responds swiftly to concerns.

# OBSERVATIONS & RECOMMENDATIONS – RICHLAND SCHOOL DISTRICT

**Observation 1: Income-Based Achievement Gap**
Richland School District's goal is to "expand learning for all while reducing the income-based achievement gap," addressing the gap between students with low SES and those with high SES. This gap is exacerbated when disability status is factored into the data.

> **Recommendation 1:** Align the focus of RSD's Special Education to the overarching vision of reducing the income-based achievement gap, providing focus and targets disaggregated by disability status.

**Observation 2: Response to Intervention**
The district has historically placed a strong emphasis on Response to Intervention (RTI). However, the RTI process is unclear to many in the district; implementation is inconsistent among schools; and the model has morphed into what might be considered a traditional categorical model of special education with Tier 3 essentially synonymous with special education.

> **Recommendation 2:** The district should consider a revision of the current RTI model that could include rebranding to a multi-tiered system of supports (MTSS) framework that employs universal design for learning, provides all students with a meaningful opportunity to learn and options for progress monitoring, and is a problem-solving process that helps match instructional resources and focus to educational needs.

**Observation 3: Collaboration**
The district has several teams that collaborate around various initiatives; however, there is not a clear structure for the development and implementation of cohesive and collaborative leadership teams that support the development of all students in the district. Such a team would

include leaders in special education, English language learners, teaching and learning, as well as Assistant Superintendents.

**Recommendation 3:** Develop collaborative structures across departments to support districtwide initiatives and develop supportive processes at the building level that might include co-facilitating professional learning and conducting instructional rounds.

**Observation 4: Budget**

The district's expenses for special education have seen a significant increase over the last five years and the budgeting process for special education appears to allow for spending in areas that may not correlate to an increase in student achievement, specifically in the hiring of paraprofessionals.

**Recommendation 4:** Consider implementing a funding formula and processes that support a tiered approach to accessing the general education curriculum and specially designed instruction and that standardize special education budget allocations, including the use of appropriate staff.

**Observation 5: Contract**

The Richland Education Association (REA) contract impedes the ability of the district to provide professional development and encourages the use of paraeducators and overload pay for working with students.

**Recommendation 5:** Examine in detail all contractual language for areas to address professional development and the use of paraeducators with the Richland Education Association.

## OBSERVATIONS & RECOMMENDATIONS – RICHLAND SPECIAL EDUCATION

**Observation 6: Student Demographics**

Classification rates and decisions concerning educational environment need to be examined and tracked.

**Recommendation 6:** Examine classification, evaluation, and placement practices to assure fidelity and track classification and educational placement data.

**Observation 7: Academic Achievement**

The academic achievement of students with disabilities in Richland School District is below the academic achievement of students without disabilities.

**Recommendation 7:** Using the MTSS process embedded with the UDL framework, improve academic outcomes for students with disabilities.

**Observation 8: Special Education Vision**

RSD lacks a clear vision and mission of what special education should be and specific action steps on how to achieve these goals.

**Recommendation 8:** Special Education must go through a process to create a vision and strategic plan focused on the educational outcomes of students with disabilities and

aligned to the district's overarching focus on reducing the income-based achievement gap.

**Observation 9: Special Education Supports and Services**

As stated, there is not a clear understanding of what is special education. Specifically, special education does not appear to be a service supporting students to succeed in the general education curriculum; there is limited understanding of the flexibility within a continuum of special education services and supports; few special education supports and services are provided in the general education environment; and there is limited understanding of what is specially designed instruction (SDI).

**Recommendation 9:** Ensure that there is a full continuum of services throughout the district, with an emphasis on inclusive practices and supports and services that provide access to both the general education curriculum and the specially designed instruction.

**Observation 10: Individualized Education Programs**

While the IEP process is generally technically compliant, issues related to the understanding of disability and special education supports and services are evident in the IEP. Specifically, IEPs are developed with low expectations of students with disabilities and an overreliance on disability classification to make disability and placement determinations. In addition, there are not effective processes for general education staff and paraprofessionals to know and be educated concerning the most relevant **information in the IEP.**

**Recommendation 10:** Develop IEPs with a deep understanding of disability and the possibilities of effective and inclusive individualized special education supports and services, and processes to share this information with all who work with the student.

**Observation 11: School Leadership**

Principals are willing to, and have taken more ownership of, the special education process in their schools. However, the focus of the special education department's work with principals has been on the details of the IEP process, and there is to date limited communication and collaboration between the special education department and principals as it relates to instruction and student success.

**Recommendation 11**: Further develop systems of collaboration and provide guidance that support principals to use their expertise as instructional leaders to participate in the determination and implementation of special educational supports and services to students with disabilities in their schools.

**Observation 12: Staffing**

While RSD employs highly qualified special educators, the district relies heavily on the use of paraprofessionals to provide special education services and does not use an appropriate number of teachers, instructional specialists, mental health providers, literacy specialists, etc., to support effective and inclusive special education supports and services.

**Recommendation 12:** Develop district guidance, processes, and systems of oversight to decide when the use of a paraprofessional is appropriate and how the paraprofessional will provide services.

**Observation 13: School Culture**
Many staff expressed feeling overwhelmed, underprepared, and unclear in their charge to address the needs of students with disabilities.

> **Recommendation 13:** Develop an internal working group of special education staff across all building levels to meet regularly with the special education central office team to work collaboratively on providing supports and services, as well as designing internal and external communication structures to increase transparency and strengthen partnerships with parents and community.

**Observation 14: Professional Development**
Staff are not consistently supported with the needed professional development to provide access to the general education curriculum and specially designed instruction.

> **Recommendation 14:** Provide training to ensure that special education staff are adept at providing accommodations and modifications for students to access the general education curriculum no matter their skill level and specially designed instruction to work on developing students' skills.

**Observation 15: Social-Emotional Learning Standards/Mental Health Supports**
RSD does not have a districtwide instructional focus or a plan to integrate social-emotional learning standards into the district's ongoing initiatives. In addition, the district is lacking mental health supports or an adequate number of personnel trained in addressing the complex needs of students who require more intensive wraparound supports.

> **Recommendation 15:** Adopt and implement districtwide social-emotional standards and positive behavioral supports, with mental health supports and community partnerships, changing the perspective to look at negative behaviors as lagging skills rather than purposeful actions. In addition, repurpose all isolation rooms to use for other functions, with the ability to have some space in school for students to decompress in a safe space with structured support and options for sensory integration.

**Observation 16: Transition Planning**
Richland School District comes close to or exceeds state transition rates and targets for students enrolling in higher education, working, or in postsecondary training. The district currently has some strong transition supports and services; however, the majority of students are not able to take advantage of these programs, and the number of students with successful postsecondary outcomes has declined in the district.

> **Recommendation 16:** Develop programs, partnerships, and processes that support all students who remain in the district until the age 22, using the current effective program as a model.

**Observation 17: Assistive Technology**
The district does not have a dedicated team that can support staff with evaluating, procuring, and implementing effective assistive technologies.

**Recommendation 17:** Dedicate at least one person in special education to oversee assistive technology, including providing staff training, procurement, and inventory, and train a team of staff that can conduct evaluations for the effective use of assistive technology.

**Observation 18: Extended School Year**

Richland has a process in place for deciding whether students require extended school year (ESY) services; however, the process requires documentation of actual regression, rather than the likelihood of regression.

**Recommendation 18:** In keeping with the legal criteria and intent of ESY, the "likelihood of regression [and] slow recoupment" are acceptable reasons for determining that a student receive ESY and further, "showing of actual regression is not required to find a child eligible for ESY," Richland should consider including more flexibility in how ESY decisions are made. (See Department of Education Opinion Letter.)