Princeton Public Schools

Comprehensive Special Education Review

May 25, 2021

FINAL REPORT

PUBLIC
CONSULTING GROUP

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I.   INTRODUCTION AND METHODOLOGY

ACKNOWLEDGEMENT

Public Consulting Group (PCG) thanks the many individuals from the Princeton Public Schools who contributed to this review, including its Director of Student Services, Micki Crisafulli; its retired Superintendent, Steven Cochrane; its interim Superintendent, Barry Galasso; its Board of Education; its Special Education Parent Advisory Group; its Parent Teacher Association; and the countless teachers; parents; and students who participated in this review.

INTRODUCTION

Princeton Public Schools (PPS) is a public-school district located in central New Jersey. In the 2019-20 school year, it served approximately 3,859 students in pre-kindergarten through twelfth grade.[1] Located in Princeton, NJ, the community has a population of approximately 31,187 residents.[2]

According to the district:

> *Our mission is to prepare all of our students to lead lives of joy and purpose as knowledgeable, creative and compassionate citizens of a global society.*

PPS' motto, reflective of its educated citizenry that is invested in primary, secondary, and postsecondary education is:

> *Live to Learn, Learn to Live*

Local Context

PPS has six schools in its district: Princeton High School (grades 9-12); the Princeton Unified Middle School, formerly known as the John Witherspoon Middle School (grades 6-8); Community Park School (grades PK-5); Johnson Park School (grades PK-5); Little Brook School (grades PK-5); and Riverside School (grades PK-5). PPS has a sending and receiving agreement with Cranbury Schools, NJ in which Cranbury enrolls approximately 280 of its students at Princeton High School.[3]

In the 2019-20 school year, approximately 16.4% of PPS' students were classified with a disability and have an Individualized Education Plan (IEP).[4] This is slightly lower than the 2019-20 state average of 17.4%.[5]

Of its students with IEPs ages 5-21, 196 are female and 420 are male; of its students with IEPs ages 3-5, 19 are male and less than 10 are female. In total, of its students with IEPs, 31% are female and

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[1] https://rc.doe.state.nj.us/district/detail/21/4255/demographics?lang=EN

[2]

[3] https://www.boarddocs.com/nj/pps/Board.nsf/files/AXWLAQ51A596/$file/Princeton%20Cranbury%20Fact%20Sheet%204-17-2018.pdf

[4] https://rc.doe.state.nj.us/district/detail/21/4255/demographics?lang=EN

[5] https://rc.doe.state.nj.us/state/detail/demographics?lang=EN

69% are male. This ratio differs slightly from the state ratio in which over 34% are female and over 65% are male.

In addition, of the entire student population in PPS, 12.8% are considered Economically Disadvantaged Students and 4.9% are considered English Learners.[6] This differs from the state averages, where over 37% students are considered Economically Disadvantaged Students and 7.4% are English Learners.[7]

Highly Regarded School District

According to Niche.com, a commercial website that ranks school districts across the United States, PPS is ranked 1 out of 243 "best school districts in New Jersey" and 1 out of 378 "districts with best teachers in New Jersey."[8] In addition, Littlebrook School was one of nine New Jersey public schools recognized in 2017 as a Blue Ribbon School by the United States Department of Education.

In Princeton, the median value of owner-occupied housing units between 2015-2019 is $866,200.[9] The median household income is $137,672.[10] Over 81% of its adult residents age 25 and over have a bachelor's degree or higher.[11] Home to Princeton University, many of the community's residents with students enrolled in the district are connected to the university faculty, visiting scholars, graduate students, or staff. Its connection to the university (due to short term faculty residencies or graduate studies), leads to a transient student population which unique challenges in the special education program.

Princeton consistently is ranked as having an extraordinarily educated population – 80.6% of its adult residents have a bachelor's degree or higher and 56.4% of its adult residents have a graduate or professional degree.[12]

Challenges Outside of the Control of Special Education Administration that Have a Direct Impact on Special Education Programming

The following paragraphs in this section will address a number of key operational challenges in supporting students with IEPs in PPS:

(1) Building-level Culture and Climate of Shared Responsibilities for Students with Disabilities;

(2) Disproportionate Overidentification of Hispanic Students for all classification areas for Special Education Services;

(3) Disconnects in Activities to Support Struggling Learners and Special Education Pre-referral;

(4) Challenges with Dual Language Immersion Programming and Supporting Students with Low Incidence Disabilities; and

(5) Leadership Changes.

A unique characteristic of all these operational challenges is **they are predominately overseen by leaders outside of the PPS Special Education Department**. Yet, and most importantly, have a profound impact on the overall quality and support of services for students with IEPs in PPS.

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[6] Id.

[7] https://rc.doe.state.nj.us/state/detail/demographics?lang=EN

[8] https://www.niche.com/k12/d/princeton-public-schools-nj/rankings/

[9] https://www.census.gov/quickfacts/fact/table/princetonnewjersey,mercercountynewjersey,NJ/PST045219

[10] Id.

[11] Id.

[12] https://www.nj.com/data/2020/03/these-are-njs-most-educated-towns-see-how-yours-stacks-up.html

Although addressing these key challenges will require leadership from the Special Education Director, fully realizing the actionable recommendations at the conclusion of this report will require significant leadership and buy-in from the incoming Superintendent of Schools, the incoming Assistant Superintendent of Schools for Curriculum and Instruction, and existing school Principals.

Building-level Culture and Climate of Shared Responsibility for Students with Disabilities

According to teachers, administrators, and parents, one of PPS' most significant challenges has been supporting a culture and climate of shared responsibility at the building level, specifically middle and high schools. According to information gathered from interviews and focus groups, some building administrators continue to struggle in defining their role to better foster an environment of inclusivity for students with disabilities. This is especially apparent in building-level beliefs around consistent adherence to a positive behavior system, prioritization of professional development, and implementation of co-taught instruction, differentiated instruction, and developing systems to support struggling high school students with IEPs. During the 2019-20 school year, according to building administration, approximately 89% of all students with Ds or Fs in classes on their report cards are students with IEPs.

Disproportionate Overidentification of Hispanic Students for Special Education Services

Between the 2014-15, 2015-16, 2016-17, 2017-18, and 2018-19 school years, PPS was cited by the New Jersey Department of Education for the overidentification of Hispanic Students for special education services. For five years, the district was required to set aside 15% of its Individuals with Disabilities Education Act of 2004 (IDEA) funds it receives via the New Jersey Department of Education (NJDOE) for Coordinated Early Intervening Services (CEIS). In the 2018-19 school year, PPS' CEIS set-aside was approximately $169,262 and was one of eighteen school districts in New Jersey required to set aside these resources because of a disproportionality finding. PPS used its CEIS resources to fund two interventionists whose role was to pilot a Multi-Tiered System of Support (MTSS) within its Intervention and Referral Services (I&RS) programming.

In the 2018-19 school year (effective 2019-20 school year), PPS was no longer found by NJDOE to have a disproportionality issue and was no longer required to set aside 15% for CEIS programming. Although the district invested resources to support prereferral programming, the district still struggles to engage in consistent practices around pre-referral supports.

Disconnects in Activities to Support Struggling Learners and Pre-referral

The district engages in three primary activities to support struggling learners and engage in data-informed pre-referral interventions: (1) Intervention and Referral Services (I&RS); (2) Accelerated Intervention Services (AIS); and (3) Multi-Tiered System of Support (MTSS), which is also sometimes referred to within the district as Response to Intervention (RtI). Within this report, we will define and discuss each of these. Although these are general education initiatives, they play an important role in supporting students who may potentially have a disability. Within PPS, although commendable it has been working to increase these efforts, it is doing so in a manner that is misaligned, inconsistent, and siloed in the areas of both implementation and oversight. All the while, as stated earlier, key initiatives that support special education referrals fall outside of the purview of the Special Education Department.

Misalignment in these activities can have negative impacts – both on supporting struggling students as well as students who may have disabilities. Having cohesive prereferral programming is especially important to avoid the potential disability-overidentification of all students, including students who are a racial minority. Adding to these challenges, a significant number of parents whose children have IEPs are unaware of the district's prereferral interventions and responded to PCG's parent survey indicating they were not aware of its existence and/or if their child participated prior to being referred for special education services.

One of PPS' schools, Community Park Elementary School, is entirely a Dual Language program. According to the district,

> "…students in Kindergarten through 5th grade spend approximately 50 percent of their core academic day learning in Spanish and the other 50 percent learning in English. This means every DLI student has two main teachers, one for English instruction and one for Spanish. In our program, students learn math, science, and Spanish language arts in Spanish, and language arts and social studies in English. Specials, such as physical education, music, or library, are taught in English. This 50-50 model allows students to maintain proficiency in their native language while adding a second language. Around mid-year students will speak only in Spanish during the Spanish class and only in English during the English portion of the day. At the completion of elementary school, students will be on their way to becoming biliterate and bilingual in both Spanish and English. Research has shown that this DLI model is highly successful at teaching grade-level content while developing impressive levels of language proficiency in students."

Although the school is presently a 50-50 model, the district has expressed an interest in it becoming a 100% fully immersive DLI program; yet it has not fully analyzed the impact this could have on students with disabilities in the Community Park feeder pattern.

Unlike other districts which may configure its dual language immersion program as a magnet school or a school-within-a-school, Community Park is the feeder school for specific neighborhoods in Princeton. According to parents, teachers, and administrators, this configuration can be particularly problematic for children with disabilities who may struggle with learning in a second language. This configuration causes families of children with disabilities to choose sending their child to another elementary school in the district (outside of their neighborhood school). Alternatively, according to information shared by staff and parents, children may begin programming at Community Park but struggle mightily because there are so few special education resources to support students, especially students with low incidence disabilities, in the Community Park dual language environment. Consequently, there are reportedly few students with low incidence disabilities at Community Park. As noted by district administration, Community Park has added a bilingual special education teacher, has increased In Class Resource (ICR) support where needed and increased special education teaching staff.

Leadership Changes

In February 2020, after six years as PPS' leader, the district's former Superintendent of Schools announced retirement from the district. The district hired an interim Superintendent who will be staying in that role until June 2021. Near the same time as the Superintendent's retirement, the district's long-time Assistant Superintendent for Curriculum and Instruction retired and its high school principal resigned for a new opportunity in another district. Furthermore, in the 2019-20 school year, the district hired a new Business Administrator. The district's new Superintendent of Schools will begin on July 1, 2021. In addition, the present Assistant Superintendent for Curriculum and Instruction is an interim; a permanent Assistant Superintendent will be later identified.

PURPOSE OF STUDY

This report describes the current state of the special education program in PPS and is designed to: (1) inform program implementation; (2) determine gaps; and (3) offer recommendations for the continued improvement of the PPS's special education programs and services. Program evaluation efforts are aligned with the following areas that have been identified by the district:

1. Program Offerings/Continuum of Services
2. Special Education Code NJAC 6A: 14 (Monitoring & Compliance)
3. Professional Development for Staff

4. Consistency in Procedure, Process & Programming, and Articulation Between Schools
5. Resources
6. Parent Relations

It should be noted that information and/or insights reflect the overall objectives of this district-wide program evaluation which are associated with the overall goal of improving special education programs and services, as well as, minimizing associated risks. It further examines the following evaluation questions and areas of focus:

EXHIBIT 1: PCG GUIDING QUESTIONS AND PPS RFP SPECIFICATIONS

PCG Guiding Questions	PPS RFP Specifications
▪ **How is the District's continuum of services organized to support a Free and Appropriate Education (FAPE)?**	▪ *Program Offerings / Continuum of Services* ▪ *Special Education Code NJAC 6A;14 (Monitoring and Compliance)* ▪ *Professional Development*
▪ **To what degree do students with disabilities have access to the general education curriculum?**	▪ *Program Offerings / Continuum of Services* ▪ *Special Education Code NJAC 6A;14 (Monitoring and Compliance)*
▪ **How are funds budgeted and what are the major cost drivers?**	▪ *Resources*
▪ **How are inclusive practices employed?**	▪ *Consistency in Procedure* ▪ *Program Offerings / Continuum of Services* ▪ *Special Education Code NJAC 6A;14 (Monitoring and Compliance)*
▪ **To what extent does PPS organize and utilize its human capital resources to provide adequate services for students with disabilities to support student learning outcomes?**	▪ *Consistency in Procedure* ▪ *Process & Programming, and Articulation Between Schools*
▪ **How has PPS's school and district leadership fostered a culture that is focused on improving outcomes and post-secondary preparation?**	▪ *Consistency in Procedure* ▪ *Process & Programming, and Articulation Between Schools* ▪ *Resources* ▪ *Parent Relations Professional Development*
▪ **To what extent does PPS meet the needs of students with disabilities and their families in the area of compliance with state and federal regulations?**	▪ *Special Education Code NJAC 6A.14 (Monitoring and Compliance)* ▪ *Professional Development*

METHODOLOGY

The PPS special education program review was designed before the COVID-19 Global Pandemic impacted the operations of school districts. It was originally expected that PCG would complete its evaluation of PPS' special education program at the end of the 2019-20 school year, however, due to the complications caused by the pandemic, adjustments to the review methodology were mandated.

The pandemic limited traditional access to school buildings, staff and parents. However, the PPS administration must be recognized for their response to this crisis as well as maintaining an on-going collaborative engagement with PCG for the purposes of continuing this review. As a result, all of the evaluation activities (e.g. interviews, focus groups and observations) were implemented via a virtual platform. With the collaboration of the PPS administration, dedicated staff and families, the shift from an on-site to virtual context was nearly seamless and did not affect the ability or quality of this program review.

Central to this program review was the recognition that special education is infused within the overall provision of general education and must be compatible with district systems of accountability. From December 2019 through May 2021, PCG conducted this study with revisions in timelines, a shift from in-person to virtual meetings, and a change in classroom visit protocols.

Mixed-Method Approach to Evaluation Data

The overall research design used in this program and system evaluation may be characterized as a collaborative non-experimental, or even naturalistic, program study within which a combination of qualitative and quantitative data collection and analysis was implemented, often referred to as mixed methods. This methodological diversity allowed for a variety of data collection initiatives, both qualitative and quantitative, to be identified using the parameters of the stated research questions. This enabled PCG to assure the rigor of the review included impact, process, and outcomes.

Qualitative Methods

This review of special education services within the Princeton Public Schools used a robust qualitative approach with an emphasis on formative program evaluation. The evaluation data has three sources: *semi-structured interviews* (including focus groups), *observations*, and *document review* (i.e. policies, procedural manuals, etc.). These qualitative sources of data are the most frequently used within program evaluations. In particular, interviews are used to identify information that cannot be directly observed.[13] The method and sources of data are triangulated to increase the validity of the conclusions, in this case, regarding program implementation, identification of gaps, and recommendations for the continued improvement of PPS' special education programs and services.

Subjects that were selected to be interviewed or participate in small focus groups (3-6 participants) were identified using recognized sampling procedures. *Information-rich Cases;* and *homogenous samples* were used as the primary approach to choosing those to be included in the interviews/focus groups. In addition, under certain circumstances or discovery, *extreme case* sampling was used to yield information regarding any stark contrast between constituent groups and to develop a theory or explanation of these very different impressions.

Data Analysis

Data was collected from a variety of sources using different methods, thereby, strengthening the conclusions by comparing the range of information obtained from independent sources and exploring any inconsistencies via triangulation. Therefore, the findings, commendations, and recommendations related to programs, policies, and practices resulted from a comprehensive analysis of a variety of data sources. Sources included: **(1) Data and Document Analysis; (2) Focus Groups and Interviews; (3) Student File Review Focus Groups**; and **(4) Targeted Surveys**. The overall analysis drew from the most current research and practice literature, as well as, up to date interpretations of state and federal laws/regulations to inform the findings and recommendations. PCG used publicly available achievement and financial information to compare key PPS statistics against local district, state, and national data.

Population Trends, Programs, Achievement, and Outcomes Analysis

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[13] Patton, Michael Quinn. 2002. Qualitative Research and Evaluation Methods. 3rd Edition. Thousand Oaks, CA: Sage Publications

As part of this review, PCG analyzed special education population trends, programs, and achievement outcomes. Through analysis of assessment data, educational setting data, and other indicators, the team compared student identification rates and outcomes by disability, ethnicity, gender, and other demographic variables. Data included in the report also compare students with IEPs to their typically developing peers.

Population and program placement trends are significant equity indicators of the extent to which there is overrepresentation of any group in the special education population. They also provide important information about the distribution of the special education population in placements that represent the least restrictive environment. Population trends were analyzed to show, where possible, changes over time by grade level/age, race/ethnicity, disability categories, level of service, and combinations of variables. Student performance data were analyzed to provide a comparative examination of performance by both students with and without disabilities.

Document Review & Analysis

PCG reviewed nearly 100 district-provided documents for information related to district and school structures, programs, policies, and practices. Documents reviewed were in the following general categories:

- Quantitative Data
    - Student Level data
    - Graduation rate, dropout rate, and exit rate
    - Achievement
    - Personnel
- Qualitative Data
    - Organization
    - Instruction
    - Improvement planning
    - Multi-tiered systems of support (MTSS)
    - Referrals
    - Setting
    - Interventions
    - Configuration of programs
    - Instructional supports
    - Professional development
    - Staffing Allocations
    - Related Services
    - Paraprofessionals
    - Standard Operating Procedures
    - Due Process
    - Budget
    - Parent Engagement
    - Accountability
    - Collective Bargaining Agreements

Organizational and Administrative Focus Groups and Interviews

Between April 9, 2020 to June 20, 2020, PCG conducted 11 interviews and focus groups which included two board members and 10 central office administrators. On December 3 and 4, 2020, PCG individually interviewed all six building principals.

PCG worked closely with PPS to determine the best outreach and communication methods for focus group and interview participation. PCG provided a sample schedule and list of positions required to participate. Student file review focus groups for special education teachers and related service

providers were scheduled during the school day. The district also sent an announcement to parents/families inviting them to participate in a virtual evening focus group session.

Within this report, no focus group or interview participants are personally referred to, although position titles may be referenced in some cases when necessary for contextual reasons.

In order to gain an understanding of how special education programs operate broadly within the district, organizational focus groups and interviews were designed to include a range of stakeholders. Focus groups generally consisted of 6 to 8 participants. Supervisors did not participate in the same focus group or interview sessions with their staff members, in order to give all staff an opportunity to speak candidly.

Classroom Visits

For all students, including those with IEPs, to meet high academic standards and fully demonstrate their knowledge and skills in reading, writing, speaking, listening and mathematics, their instruction must be flexible, yet challenging, and incorporate scaffolds and accommodations to overcome potential learning barriers. It is essential that the curriculum be designed to enable all students to successfully access and engage in learning without changing or reducing instructional goals.

In order to meet the needs of all diverse learners in the classroom, it is important to implement Universal Design for Learning (UDL) (in the general education classroom as solid core instruction), Differentiated Instruction, Accommodations and Modifications, and Specially Designed Instruction (SDI) to support the access and success of the learners. Implementing a balanced mix of appropriate supports while maintaining the integrity of the curriculum can be challenging but needed to support diverse learners. It is for these reasons that classroom observations are such an important part of the PCG special education review process.

From February 8 to February 12, 2021, PCG engaged in 17 remote classroom visits. PCG's classroom visit process narrows the targets of the observation to include practices considered essential to the effective instruction of students with IEPs; are easily observable; and includes a pre/post teacher discussion to assure impressions are accurate. PCG's observation is seeking evidence of the presence and implementation of (1) Elements of Universal Design for Learning / Differentiation of Content, Process and Product; (2) Use / Evidence of a System of Tiered Support; (3) Implementation of Accommodations; (4) Specially-Designed Instruction; (5) Inclusive Instructional Special Education Practices and (6) Co-Teaching Practices. PCG's process is designed in a similar manner to the Harvard University Clinical Supervision Model that assures that the teacher is included in the observation process and remains fully aware of what the observers are looking to validate. However, the classroom visits were not evaluative in nature and the notes from PCG's visits, as well as notes from pre and post meetings, were not shared with PPS.

Student File Review Focus Groups

On February 16 and 17, 2021, PCG conducted six file review focus groups. Each group included approximately five Child Study Team (CST) members and typically 1-2 teachers. PCG conducted a series of student-centered file review focus groups that allowed for conversation about school-based practices, through the review of IEPs and IEP progress reports. Through this records review, PCG addressed a number of themes related to special education management, student identification, programs and services, curriculum and instruction and staffing, while addressing specific process questions about the development of IEPs, their implementation, and documentation. Participants included special education teachers and related service providers and individuals who both knew, and did not know, the student.

Student records were selected at random by PCG and included a wide cross-section of schools, ages, gender, and disability categories. It also included a combination of students with disabilities who were English Learners and those who were not. Approximately 3-4 student records were discussed during each focus group session.

Parent Focus Groups and Interviews

On November 17, 19, and 23, 2020, PCG held three virtual parent focus groups in which 53 parents registered.

Student Focus Groups

On March 10, 2021, eight students with IEPs from both the middle school and high schools participated in a virtual focus group. Students were asked about their experiences with the supports they receive as part of their special education programming.

Parent and Staff Surveys

PCG administered an electronic survey for both PPS staff and parents of students with IEPs. Survey items were drawn from the research and practice literature in special education and clustered to acquire data from each stakeholder group regarding the extent to which these groups perceived that policies and practices shown in the literature to support effective programming, parent involvement, and positive results for students with disabilities were evident in PPS.

The district reviewed the survey items to verify their relevance and added items where appropriate.

The parent and staff surveys incorporated five-point rating scales, yes/no questions and included open-ended text areas. For reporting purposes, the five-point rating scale was consolidated into three categories: agree (which includes strongly agree, and agree); disagree (which includes strongly disagree and disagree); and don't know or not applicable (where this option was provided to respondents).

The district worked collaboratively with the PCG team to facilitate a survey process that would result in the highest possible rate of return. In order to encourage participation, all potential participants were informed of the purpose of the survey and provided with instructions for accessing the survey online. An invitation letter was drafted, and two reminder emails were sent to parents as well as a reminder directly from the district.

The following outreach methods were used for the parent survey:
- Emails went out to all parents of students with IEPs.
- Two reminders were sent to parents.
- Special Education PTO sent out information in newsletters.

The following outreach methods were used for the staff survey:
- Emails went out to all teachers, administrators, and paraeducators.
- Two reminders were sent to staff.

Approximately 30% parents with students who have an IEP completed the parent survey[14].

Approximately 60% of all special education teachers and approximately 20% of all general education teachers participated in the staff survey.

Characteristics of survey respondents are included in Appendix.

PCG FOUNDATIONAL APPROACH

PCG's approach to its work with state, county, and district organizations is as a thought partner. That is, we act as an outside agent, with an objective perspective, who works alongside educational entities to identify challenges and provide recommendations for improvement. We follow a mixed methods Collaborative Program Evaluation model that is systematic, based upon both qualitative and

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[14] 200 surveys out of approximately 650 households. It is important to note, this is an approximate number, as more than one member of a household may have taken the survey.

quantitative research methods, and produces credible and valid data that proactively informs program implementation, determines gaps, and offers recommendations for the continued improvement of the program. We value the importance of developing trust, open communication, and fostering collaboration between the review team and program staff.

Our philosophy for guiding the transformation of special education in schools and districts is driven by the U.S. Department of Education's Results Driven Accountability (RDA) framework and rooted in key tenets of the Schoolwide Integrated Framework Transformation (SWIFT) model.

Results Driven Accountability

In 2013, the U.S. Department of Education's Office of Special Education Programs (OSEP) recognized that the educational outcomes of children and youth with disabilities have not improved as much as expected even with intensive federal regulatory oversight and funding provided to address closing achievement gaps. The Department subsequently announced movement toward prioritizing improvement of outcomes for students with disabilities, from a one-size-fits-all, compliance-focused approach to general supervision to a more balanced system that looks at results and outcomes.[15] This approach, known as Results Driven Accountability (RDA), is consistent with the IDEA, which requires the primary focus of monitoring to be on improving educational results and functional outcomes for students with disabilities, and ensuring that states meet IDEA program requirements. RDA fulfills these requirements by bringing into focus the educational results and functional outcomes for students with disabilities while balancing those results with the compliance requirements of IDEA.[16] When providing guidance to school districts, PCG offers recommendations that strike this balance as well.

Schoolwide Integrated Framework Transformation (SWIFT) Model

Based on research related to the improvement of achievement and social/emotional outcomes for students with disabilities, the SWIFT model has received recognition by and support from OSEP. SWIFT refocuses existing traditional educational approaches to general and special education and expands inclusiveness for students covered by Title 1, those from low-income backgrounds and English Learners (ELs).

According to researchers and practitioners at the University of Kansas, and as validated by members of the PCG review team's experience working with districts nationally, there are six critical issues facing public schools, especially chronically low-performing schools, which have suppressed academic and social/emotional outcomes for students and must be addressed to reverse this trend: 1) fragmented support "silos" and lack of family partnership with schools; 2) achievement gaps between subgroups of students based on social, language and/or disability characteristics; 3) lack of student engagement and behavior that impedes learning; 4) lack of implementation of both systems level and student-level evidence-based interventions with fidelity; 5) lack of knowledge sharing and resource availability; and 6) lack of sustainability and replication of successful schoolwide models of inclusive education.

SWIFT's five core domains for school and district improvement are backed by research and growing evidence that addressing the above six issues is critical for improving outcomes for SWDs. The domains include a Multi-Tiered System of Supports (MTSS), which provides interventions and support for students at varied levels of intensity and focuses on the importance of good first teaching, and a Universal Design for Learning (UDL) curriculum and instruction. It aims to build school capacity to provide academic and behavioral support to improve outcomes for all students through equity-based inclusion. The domains, in detail, are:

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[15] April 5, 2012, RDA Summary, U.S. Department of Education. https://www2.ed.gov/about/offices/list/osers/osep/rda-summary.doc
[16] *Id.*

- Administrative Leadership. A deeply engaged administrative leadership that is committed to transformative inclusive education.
- Multi-Tiered System of Supports (MTSS). Use of a MTSS where all academic and behavioral instruction is delivered through a schoolwide data-driven system utilizing universal design at all grade levels.
- Integrated Educational Framework. A strong and positive school culture creates an atmosphere in which everyone feels like they belong. To the extent possible, all students participate in the general education curriculum instruction and activities of their grade level peers. Schools embrace ways to redefine roles of paraeducators and teaching assistants to support all students.
- Family/Community Partnerships. Family and community partnerships are formed, and families are actively engaged in both the organizational makeup of the school as well as their child's education.
- Inclusive Policy Structure & Practice. District-level support and integrated policy structure are fully aligned and remove barriers and misconceptions surrounding implementation.

In addition, PCG emphasizes the need for intentional support that takes into consideration students' linguistic and cultural diversity. Districtwide and schoolwide practices based on these components provide a practitioner-focused, research-based, and federally recognized approach to improving academic/social emotional outcomes for all students, including students with disabilities and other students who have not achieved at or above expected levels of proficiency.

REPORT STRUCTURE

The following chart maps the research questions to the most pertinent sections of the report. The report begins with a review the student-centered focus of teaching/learning and progresses to examine the ways in which PPS operates to support this essential function. It is intentionally structured in this manner in order to group interrelated topics together. As such, some answers to research questions are covered across several sections, as noted below.

EXHIBIT 2: PCG RESEARCH QUESTIONS AND CORRESPONDING REPORT SECTIONS

Research Questions	Report Chapter							
	II. Pre-referral, Referral, Eligibility and Child Find	III. Teaching, Learning, and Special Education Support	IV. Social Emotional Support for Students with Disabilities	V. Organization and Leadership	VI. Parent Engagement	VII. Budget and Finance	VIII. Special Education Compliance with State and Federal Regulations	
1. *How is the District's continuum of services organized to support a Free and Appropriate Education (FAPE)?*	X	X						
2. *To what degree do students with disabilities have access to the general education curriculum?*	X							
3. *How are inclusive practices employed?*	X	X						

4. **How are funds budgeted and what are the major cost drivers?**					X	
5. **How has PPS's school and district leadership fostered a culture that is focused on improving outcomes and post-secondary preparation?**				X		
6. **To what extent does PPS meet the needs of students with disabilities and their families in the area of compliance with state and federal regulations?**						X

PCG FOUNDATIONAL APPROACH

PCG's approach to its work with state, county, and district organizations is as a thought partner. That is, we act as an outside agent, with an objective perspective, who works alongside educational entities to identify challenges and provide recommendations for improvement. We follow a mixed methods Collaborative Program Evaluation model that is systematic, based upon both qualitative and quantitative data, and produces credible and valid data that proactively informs program implementation, determines gaps, and offers recommendations for the continued improvement of the program.[17] We value the importance of developing trust, open communication, and fostering collaboration between the review team and program staff.

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[17] Donis-Keller, C., Meltzer, J., and Chmielewski, E. (2013). The Power of Collaborative Program Evaluation, A PCG Education White Paper. Available from http://www.publicconsultinggroup.com/media/1272/pcg_collaborative_evaluation.pdf

II. PRE-REFERRAL, REFERRAL, ELIGIBILITY, AND CHILD FIND

Strengths	Opportunities
• The district has attempted to further study the root causes for its prior disproportionality finding • District created I&RS for the high school • District has site leaders responsible for I&RS • ICR courses offered in all grades at the middle school	• Need for a consistent, districtwide MTSS • Need for a consistent, districtwide I&RS • Need for a consistently aligned MTSS, I&RS, and AIS to support struggling students • Need for ownership of pre-referral initiatives within offices outside of special education • Students can receive AIS services and have an Individualized Student Acceleration Plan -- this could potentially be confusing for student who may need IEPs • No districtwide positive behavior system • ICR only offered in courses "required to graduate" at the HS • IEP PLAAFP statements, IEP goals, accommodations, and progress reports need attention.

PREREFERRAL

In New Jersey, when a child is identified as possibly having a disability, their matter is referred to the district's special education administration who then subsequently refers it to the district's Child Study Team (CST). Referrals may be submitted by instructional, administrative and other professional staff of the local school district, or parents and state agencies, including the New Jersey Department of Education (NJDOE), concerned with the welfare of students.[18] However, in New Jersey, when it is first identified that a child is struggling, districts first engage the support of its Intervention and Referral Services (I&RS) team.

Intervention and Referral Services (I&RS)

As stated in code, interventions in the general education setting are to be provided to students exhibiting academic difficulties and shall be utilized, as appropriate, prior to referring a student for an evaluation of eligibility for special education and related services.[19] When it is determined through analysis of relevant documentation and data concerning each intervention utilized that interventions in the general education program have not adequately addressed the educational difficulties and it is believed that the student may have a disability, the student shall be referred for an evaluation to

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[18] N.J.A.C. 6A:10A-3.3(a)3ii
[19] N.J.A.C. 6A:14-3.3

determine eligibility for special education programs and services.[20] In New Jersey, the staff of the general education program are required to maintain written documentation, including data setting forth the type of interventions utilized, the frequency and duration of each intervention, and the effectiveness of each intervention.[21]

The New Jersey State Board of Education adopted rules in April 2001 to provide district boards of education with standards for the delivery of Intervention and Referral Services (I&RS).[22] The requirements set forth in these regulations are intended to provide schools with direction in formulating coordinated services and team delivery systems to address the full range of student learning, behavior, and health problems in the general education program. I&RS is designed to be a student support service approach that helps school-based staff and parents address "early identification and intervention of problems at the elementary, middle and high school levels."[23] Under these regulations, New Jersey schools have the flexibility to choose the most appropriate team configuration to perform I&RS services for their buildings. In addition, they have the flexibility to choose appropriate interventions.

I&RS regulations in New Jersey pre-date the national movement toward a Multi-Tiered System of Support (MTSS) framework.[24] However, the intent of the work is aligned: to provide a "coordinated, formal, and well-articulated system of supportive activities and services for staff who have identified student difficulties and those who will be involved in the amelioration of the identified educational concerns."[25]

I&RS in PPS

In PPS, I&RS is overseen by the Assistant Superintendent for Curriculum and Instruction. According to district administration, for 2014-15, 2015-16, 2016-17, 2017-18, and 2018-19 PPS was required to set aside Coordinated Early Intervening Services (CEIS) by NJDOE because it was found have a disproportionate representation of Hispanic students identified for special education services.[26] In the 2018-19 school year, PPS' CEIS set-aside was approximately $169,262 and was one of eighteen school districts in New Jersey required to set aside these resources because of a disproportionality finding.

PPS' Special Education Department engaged in a self-study of its elementary school I&RS practices between 2017 to 2020. It did this as part of its disproportionality finding.

During the five years that PPS was found to be disproportionate, it used CEIS funding for one interventionist positions to reduce referrals to special education.

According to district administration, the goal of these CEIS funded positions was to support teachers providing interventions in the general education class, implement individual or small group targeted

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[20] Id.

[21] Id.

[22] The regulations state that Districts must "… establish and implement a coordinated system in each school building for the planning and delivery of intervention and referral services that are designed to assist students who are experiencing learning, behavior, or health difficulties…" [N.J.A.C. 6A: 16-7.1(a)]; and which are designed to: "…assist staff who have difficulties in addressing students' learning, behavior, or health needs." [N.J.A.C. 6A:16-7.1(a)].

[23] I&RS Resource Manual. In February 2014, the New Jersey State Board of Education re-adopted *N.J.A.C.* 6A:16, with amendment to the regulations at *N.J.A.C.* 6A:16-8 that establish intervention and referral services (I&RS). The 2008 I&RS manual is being updated to reflect these changes and will be posted to the state's website upon completion.

[24] RTI is a systemic, multi-tier approach to help support students with learning and behavior needs and seeks to prevent academic failure through early identification, frequent progress monitoring, and increasingly intensive research-based instructional interventions for children who continue to struggle. The RTI method was developed as an alternative to the discrepancy-model, which requires children to exhibit a discrepancy between their ability (as measured by their IQ) and their demonstrated academic achievement (http://www.rtinetwork.org/).

[25] I&RS Resource Manual.

[26] When a district receives such a finding, it is required to set aside 15% of its IDEA grant funds for Coordinated Early Intervening Services (CEIS). Coordinated early intervening services (CEIS) are services to help children who need additional academic or behavioral support to be successful in school. They can include professional development and educational and behavioral evaluations, services, and supports (see 34 CFR §300.226(b); 34 CFR §300.646(d)(1)(i)

interventions for 6 weeks at a time with data collection to determine efficacy of the intervention, and to attend all elementary I&RS meetings to ensure the following: interventions were put in place with a monitoring/data collection tool; fidelity to the data tool and collection period; a team approach to supporting students; increased awareness of language acquisition implications on learning and the required interventions; use of individual testing tools to guide interventions provided in general education; involvement of the Behaviorist to support students demonstrating signs of behavioral issues to determine the cause of the issues with supports put in place.

PPS provided PCG with analysis of its I&RS data collected by interventionists. According to the district, "…the highest number of I&RS referrals came from Kindergarten through 3rd grade. This data correlates with an increase in curricular rigor as students learn to read (1st grade) and transition to reading to learn (3rd grade). There is a decrease in referrals for 4th and 5th grade students."

EXHIBIT 3: PPS I&RS REFERRALS DURING 2017-2020, PROVIDED BY PPS
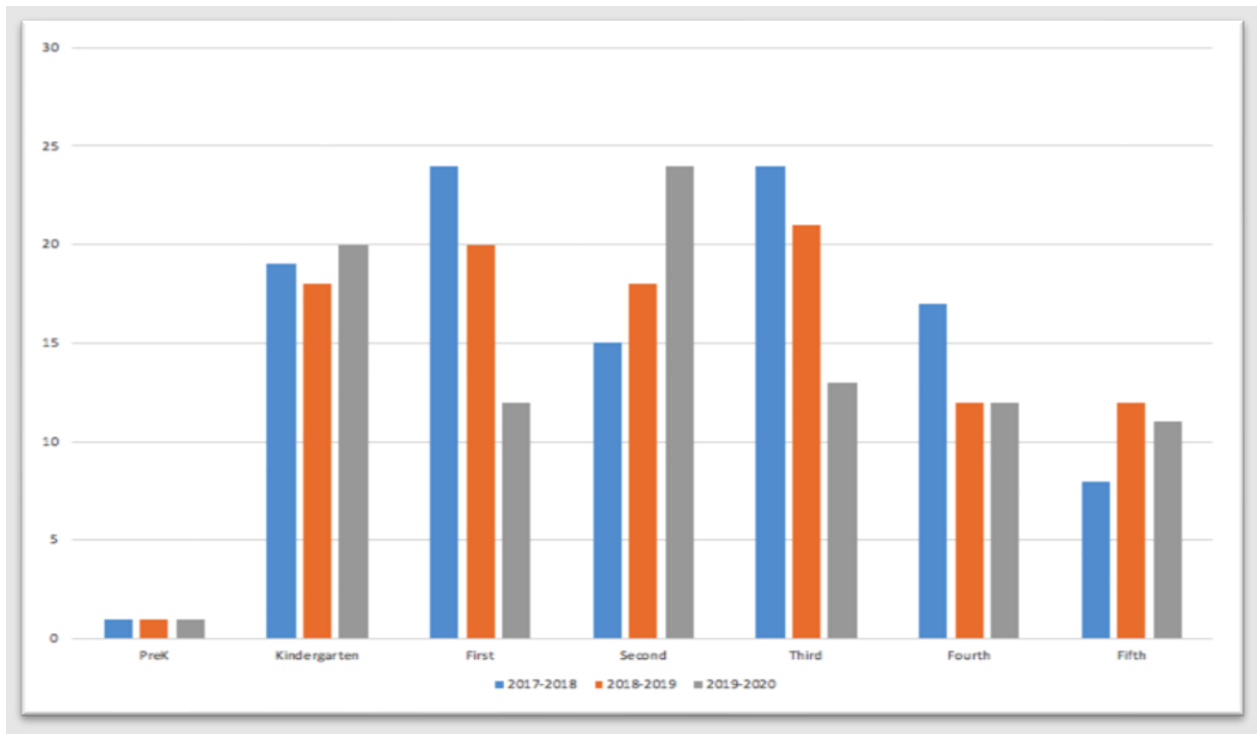
Looking deeper at elementary school I&RS supports, it found that the district was supporting higher numbers of students of color via I&RS.
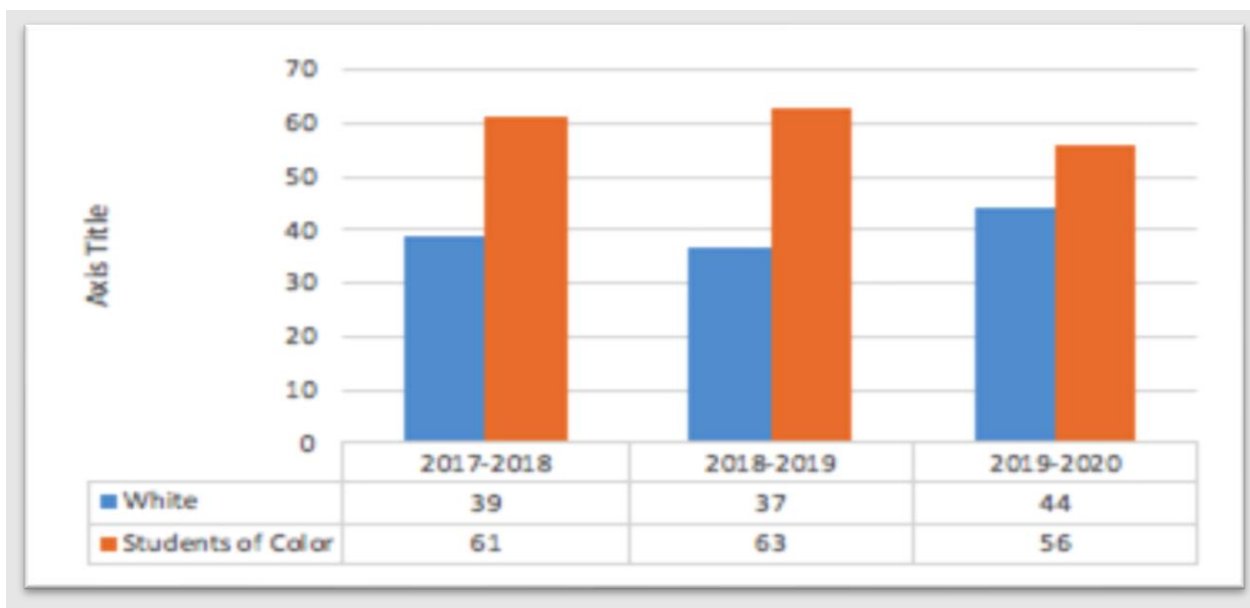
Although the district engaged in a review of its I&RS practices over the course of five years and was required to commit 15% of its CEIS resources which it used to support interventionist positions, the district did not have a formalized I&RS at its high school until the 2018-19 school year.

According to the parent survey, of the 129 parents who responded to the question: "Before being referred for a special education evaluation, did your child receive interventions in their general education program and/or supports through their schools I&RS?" over 24% responded "yes," over 54% responded "no" and over 20% responded "don't know".

According to building administration:

- "Our I&RS system is somewhat effective, some don't work very well; the procedural process is not well oiled; some of our teacher need work in Tiered 1 instruction. The process works – if a teacher wants to bring a child; the teacher takes data, information, etc".
- "We didn't have an I&RS system prior to last year; this year it is a really good committee; the committee gathers information from the teacher".

According to special education administration:

- "The I&RS committee hasn't met regularly so kids have been referred; it got better as the year went on . . . but they have a good diverse committee"
- Increasing number of black students being referred to I&RS; 50% classification rate for black students in the district; in the 2020-21 SY is 32%"

Multi-Tiered System of Support (MTSS)
The provision of instruction/interventions and support to students within a framework of Multi-Tiered System of Supports (MTSS) improves educational outcomes for all students, including those with Section 504 and IEP plans.[27] It is designed to be a general education initiative. The framework

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[27] See the Council of the Great City School's document, Common Core State Standards and Diverse Students: Using Multi-Tiered Systems of Support that outlines the key components of an integrated, multi-tiered system of instruction, interventions,

focuses on prevention and the early identification of students who may benefit from instructional and behavioral interventions, as well as acceleration that remove barriers to learning.[28] When implemented as intended, MTSS leads to increased academic achievement by supporting rigorous core instruction and strategic/targeted interventions, and improved student behavior. Furthermore, the framework has been successfully used to support a reduction in disproportionate special education referrals of students based on race, gender, or EL subgroups.

Reflecting on the growing recognition of MTSS as a system wide framework for supporting student achievement and positive behavior, the Every Student Succeeds Act (ESSA) includes MTSS as a permissible usage of Title I funds. The Act defines MTSS as "a comprehensive continuum of evidence- based, systemic practices to support a rapid response to students' needs, with regular observation to facilitate data-based instructional decision-making."[29] MTSS provides an overall framework for structuring and coordinating the provision of core instruction along with the additional behavioral supports, such as behavior modifications or mental health supports, some students require so that all are successful. MTSS is centered on a tiered system of support, where every student receives high quality core instruction, known as Tier 1. Some students need supplemental instruction, which is referred to as Tier 2, and a small cohort of students receive the most intensive intervention and supports, known as Tier 3. Movement among these tiers should be fluid. A student with acute needs does not need to progress through the tiers to get individualized support, and a student who needs extra support should not miss general instruction that is provided in Tier 1.

Under the MTSS framework, core instruction is evidence-based, rigorous and of high quality. By utilizing a universal design for learning system, learning differences are considered proactively rather than reactively. The instruction is culturally relevant and linguistically appropriate and is implemented with integrity for all students. The framework is based on a presumption that some students require additional instruction in order to achieve grade level standards. Increasingly intensive tiers of academic and social/emotional support are targeted to meet student needs based on data-based problem-solving and decision-making; instruction is adjusted to continually improve both student performance and the rate at which it progresses. Furthermore, the process is used to assess (using student responses to the instruction) the effectiveness of the tiered instruction/interventions being implemented. Many states have established intervention systems that align to the core tenets of the MTSS process and branded them accordingly. In New Jersey, MTSS has been adopted as the New Jersey Tiered System of Support (NJTSS).

NJTSS is a framework of academic and behavioral supports and interventions to improve student achievement based on the core components of multi-tiered systems of support (MYSS) and the three tier prevention logic of Response to Intervention (RtI). It builds upon the Intervention and Referral Services (I&RS) model and gives schools a structure to meet the academic, health, enrichment, and social emotional needs of all students. The tiered system involves the systematic development of nine essential components in schools for the effective implementation of the framework with fidelity and sustainability. Those components include:

1. Effective district and school leadership;
2. Family and community engagement;
3. Positive school culture and climate;
4. High-quality learning environments, curricula, and instructional practices;
5. Universal screening;
6. Data-based decision making;
7. Collaborative problem solving teams

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and academic and behavioral supports needed by school districts in the implementation of the Common Core State Standards. The document is applicable also to school districts in states that have not adopted these standards.

[28] MTSS reflects the merger of response to instruction/intervention (RTI2), which typically focuses on academic achievement, and a system used to focus on improving positive behavior support.

[29] Elementary and Secondary Education Act, as reauthorized in 2015.

8. Progress monitoring; and
9. Staff professional development.[30]

EXHIBIT 5: NEW JERSEY TIERED SYSTEM OF SUPPORT (NJTSS) PYRAMID, 2020-21 SCHOOL YEAR

Tier 3 provides *intensive supports and interventions* that may be delivered individually and provided in or outside of the classroom after the delivery of core instruction. There may be *adaptations* of supports and interventions based on an individual student's performance using data that are reviewed during frequent progress monitoring intervals.

Tier 2 provides *supplemental supports and interventions* that may be delivered in small-group instruction, provided in either the general classroom or during an intervention period. Interventions include evidence-based instructional practices and interventions that increase in intensity, frequency and duration based upon the review of data during regular progress monitoring intervals.

Tier 1 provides *high-quality learning environments, evidence-based curricular and instructional practices, and a continuum of supports and interventions* in general education classrooms, including bilingual classrooms, delivered with fidelity by trained teachers with the support of other professionals.

The three tiers of supports and interventions are bolstered by effective school and district leadership committed to the implementation of the system, a positive school culture and climate that is conducive for learning, and family and community engagement in the development and implementation of the framework. Across all tiers, some students may require accommodations that provide access to instruction. These supports are not contingent upon a student's level of instructional support but are necessary to access content and achieve meaningful participation in the instruction.

Multi Tiered System of Support in PPS

In PPS, MTSS is overseen by the Assistant Superintendent for Curriculum and Instruction. According to data gathered from interviews and focus groups with the Director of Special Education and Special Education Supervisors, the use of a tiered system of support (MTSS) is not formalized across the district. In addition, some in the district refer to MTSS as Response to Intervention (RtI). The district committed CEIS resources to support interventionists whose role was to support the infusion of an MTSS into its I&RS. According to information provided by the district, its Tiered System of Support includes the following three tiers with corresponding interventions:

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[30] New Jersey Tiered Systems of Support, https://www.state.nj.us/education/njtss/brief.pdf
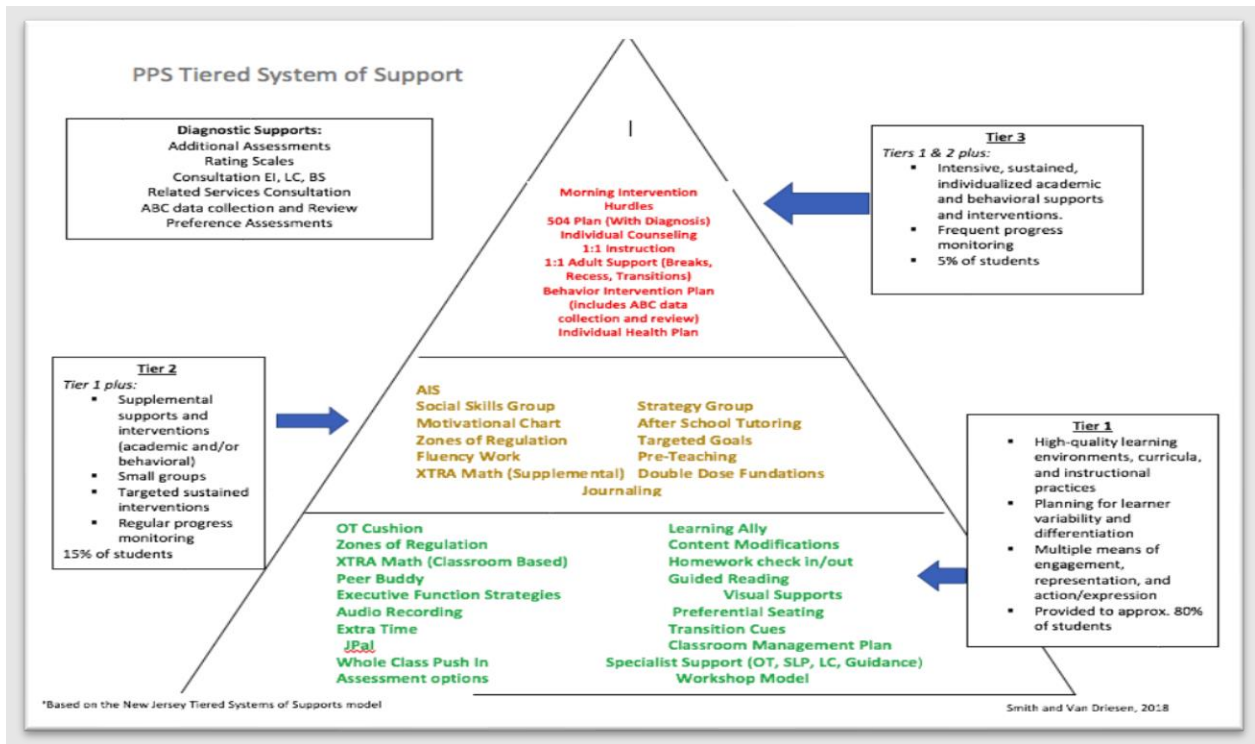
Elementary school administrators had a greater awareness of the interventions noted within PPS' pyramid; this is no coincidence, as the district's CEIS funded initiative focused on elementary schools. Nevertheless, there were also inconsistencies between what is within the pyramid and Tier 2 and Tier 3 supports that administrators discussed. Specifically, many referenced Accelerated Intervention Supports (AIS) as a Tier 2 and Tier 3 intervention; yet it is listed exclusively in Tier 2. Furthermore, items within Tier 2 are often considered quality core Tier 1 instructional practices (e.g. journaling, pre-teaching).

According to special education teachers who participated in the staff survey:

- Over 78% agree or strongly agree that before a student is referred for special education, every attempt is made to meet the student's needs through general education interventions.
- Over 64% agree or strongly agree that their school Before a student is referred for special education, every attempt is made to meet the student's needs through general education interventions.
- Over 49% agree or strongly agree that their school provides sufficient Tier 1 general education behavior intervention support.

However, according to general education teachers who participated in the staff survey, there were some notable differences:

- Although over 53% of teachers agrees or strongly agrees their school provides sufficient Tier 1 general education reading intervention support, over 25% responded they don't know.
- Only approximately 22% of teachers agree or strongly agree PPS provides sufficient Tier 1 general education math intervention support; over 16% disagree and over 39% responded they do not know.

According to parents who participated in the parent survey, of 127 parents who responded to the question "My child received interventions through the Response to Intervention (RtI) process" over 14% responded yes, over 53% responded no; and over 32% responded "don't know".

Building administrators spoke to the issue of overidentification, stating:

- "We struggle with making sure that a student is not referred if they only need a Tier 1 or 2 process."

According to special education administration:

- "We don't have a strong RTI model which we can use."
- "Progress Monitoring – we don't have a formalized system…"
- "Consistency is our biggest target, specifically Tier I and Tier II."

According to a district administrator:

- "As hard as we have worked to help teachers understand differentiation, getting teachers to understand that every student assigned to them is their student and they need to differentiate and tier for them; not all teachers are there yet. Professional development, follow up, and accountability might strengthen what we do for kids in the classroom. The excuse: "he doesn't fit in my class so what are you going to do with him" is too frequent. Tier 1 may occur in the general education classroom, but what are teachers doing to make that happen? How is it being evaluated? What accommodations are being made?"

Based on the classrooms PCG visited, the existence of a coordinated system of tiered support (RtI, MTSS) to address struggling students was not evident in any of the classroom visits nor was any system of support identified during the pre/post visits.

Accelerated Intervention Services (AIS)

Operating outside of I&RS and MTSS, PPS offers Accelerated Intervention Services (AIS) at all of its elementary schools and middle school. AIS is not a special education initiative; it is managed by building leaders, according to the district, PPS' AIS program "…provides supplemental instruction to the accelerate students' learning so that they are able to meet grade-level benchmarks in reading, writing, and mathematics. Students are selected to participate in the AIS program based on a set of criteria for each grade level." According to the district, students can receive AIS in grades 6-8. Students who participate in AIS receive an Individual Student Acceleration Plan (ISAP) – not to be confused with an Individualized Education Plan for students with disabilities.   In addition, there is a fall ISAP meeting for families to discuss their child's needs.

According to the district, "…students in grades K-5 receive AIS instruction during the Focus Period, which provides a time for all students to engage in activities that support or challenge students' strengths and needs. By receiving AIS instruction during the Focus Period, we ensure that students don't miss out on critical general classroom instruction." The district indicates that in grades 6-8, "…students enroll in a "workshop" class for mathematics, reading, and/or writing, depending on their academic need. Workshop classes allow students to be nurtured in a smaller class setting and work on targeted skills. Based on students changing academic needs, students may enter or exit the AIS program periodically during the school year."

The district indicates that AIS "…is the supplemental portion of our general education program. It is not replacement instruction. Students receive their full Language Arts and Math instruction with their classroom teacher. AIS offers extra help to students in addition to this classroom instruction. The program is based upon the individual needs of the students being served. Therefore, the focus of each AIS class will change with those needs. The instructional format is established in collaboration with the classroom teacher. The targeted weaknesses and goals identified will drive the AIS instruction.   It will focus intensely on specific areas in need (i.e. fluency, phonological development, or comprehension). Students will receive this extra help either in their classes or on a pull-out basis."

According to the parent survey, of 136 students who responded to the question: "Before being referred for a special education evaluation, did your child receive supports in AIS?" over 25% responded "yes," 75% responded "no" and 19% responded "don't know."

Positive Behavior Support System

PPS does not have a formal school-wide system in which data is collected and analyzed either infused into its MTSS or outside of it. However, there are mixed perceptions regarding the need for more comprehensive, formalized and consistent behavior support approaches. According to building administrators, there is no school-wide positive behavior support system; no consistent format for addressing individual problem challenges; and classrooms behavior is managed by the teacher.

Although PPS has a tiered system of support, it does not infuse a positive behavior support system within it.

According to general and special education teachers who participated in the staff survey:

- Among general education teachers, over 50% of teachers agree or strongly agree their school provides sufficient Tier 1 general education behavior intervention support; however, over 30% responded saying they did not know.
- Among special education teachers, over 50% provided the same response; however, 28% disagreed with that statement.

According to teachers who participated in the staff survey:

- Over 75% of general education teachers agree or strongly agree that before a student is referred for special education, every attempt is made to meet the student's needs through general education intervention; however, over 17% did not know.
- Over 78% of special education teachers agree or strongly agree that before a student is referred for special education, every attempt is made to meet the student's needs through general education intervention; however, over 12% did not agree.

A building principal explained the interplay between I&RS, MTSS, and AIS in the following manner:

- "We have an RTI model; I don't think that it is a formal or followed as closely as it can. Teachers use Tier 1 practices and if they see a student struggling then a referral to the I&RS system (meets once a month); then after the IR&S process and still no progress then we use AIS which is the Tier 2; the teacher will make the referral to the CST to be evaluated; or the parent can refer; there is a document (multi-page document) provide data, scores, work sample, etc.)."

Disproportionality and Risk Ratio

As stated earlier, the district was previously cited by NJDOE for disproportionality. One of the most useful, informative, and proactive methods used to calculate disproportionality "is the risk ratio, which compares one racial/ethnic group's risk of receiving special education and related services to that of all other students."[31] The risk ratio can be used to calculate disproportionality at both the state and district levels. The analysis below is intended to provide PPS with a tool to calculate risk ratios in order to monitor trends and identify areas of continued concern.

The risk ratio tool tells school personnel how the risk for one racial/ethnic group compares to the risk for a comparison group.[32] It can be used to assess:

- How much more likely is it for Hispanic students to be classified with a disability compared to all other students;

[31] Bollmer, J. Bethel, et al. (2007). Using the Risk Ratio to Assess Racial/Ethnic Disproportionality in Special Education at the School-District Level. The Journal of Special Education, Vol 41, Issue 3, pp. 186 – 198.
[32] Racial and Ethnic Disparities in Special Education: A Multi-Year Disproportionality Analysis by State, Analysis Category, and Race/Ethnicity, Office of Special Education and Rehabilitative Services, U.S. Department of Education, February 2016.

- How much more likely is it for Hispanic students with disabilities to be suspended for more than 10 days compared to all other students with disabilities;
- What the likelihood is that a student from a particular racial or ethnic group will be classified with a disability, be given a specific disability classification, or placed in a most restrictive environment;
- What the likelihood is that a student with a disability from a particular racial or ethnic group will be suspended for more than 10 days.

As a concept, "risk" looks at the general enrollment data for each racial group along with the number of students from that group who were identified for a specified category and calculates the likelihood that a student from that racial group would be found in that particular category. The general risk equation is as follows:

EXHIBIT 7: RISK RATIO CALCULATION

$$\text{Risk} = \frac{\text{Number of children from racial/ethnic group in disability category}}{\text{Number of enrolled children from racial/ethnic group}} \times 100$$

As shown below, a risk ratio greater than 2.0 or a racial/ethnic group indicates a higher risk of over-representation, while a risk ratio of less than 1.0 indicates a higher risk of under-representation. The threshold for identification of significant disproportionality is established by each state.

PCG conducted a risk ratio analysis of PPS data to identify areas where over-identification of students with disabilities based on disability, race, and discipline may be occurring. The risk ratio calculated is not designed to replicate New Jersey's significant disproportionality methodology. The intent of this calculation is to provide a formative data point to assess the extent to which identification rates and educational placement decisions are impacted by students' race/ethnicity. This tool can be used to inform ongoing analysis and monitoring.

As displayed in the exhibit below, Hispanic students were close to three times more likely to be identified with a specific learning disability and two times as likely to be identified with a speech or language impairment. Black or African American students were over twice as likely to be identified in the following areas: other health impairment, specific learning disability, speech or language impairment. [33]

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[33] Data provided by PPS in 2020

EXHIBIT 8. RISK RATIOS BY RACE/ETHNICITY AND DISABILITY, 2019 -20[34]

	Asian	Black or African American	Hispanic	White
■ Autism	1.18	1.72	1.31	0.63
■ Emotional Regulation Impairment	0.00	0.00	0.00	0.00
■ Multiple Disabilities	0.00	0.00	0.00	1.33
■ Other Health Impairment	0.33	2.46	1.59	1.03
■ Specific Learning Disability	0.22	2.43	2.83	0.75
■ Speech/ Language Impairment	0.43	2.21	2.06	0.78
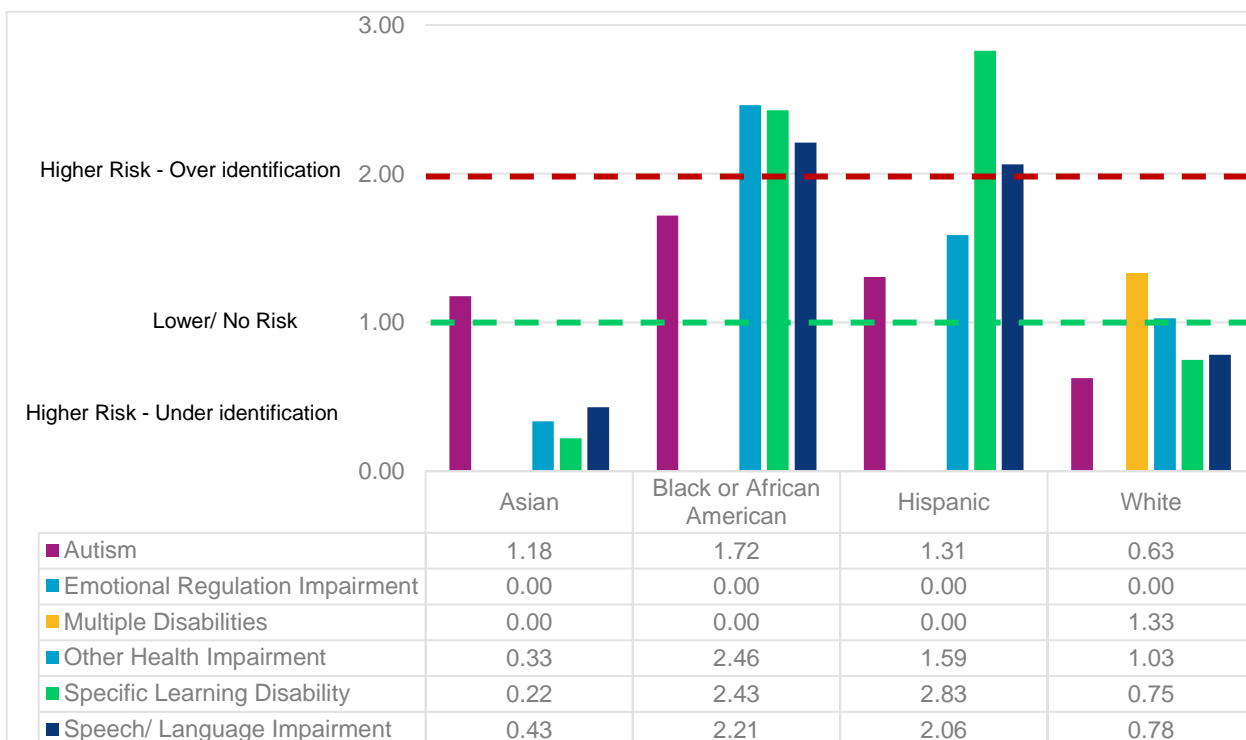
REFERRAL

Following a referral for special education services, the parent or guardian is provided notice to a meeting to determine the need for an evaluation. By law, this meeting occurs within twenty calendar days of receipt of the written request by the district to determine if an evaluation is warranted. During this meeting, existing evaluation data on the student are reviewed. In addition, current classroom-based assessments and observations are shared. Per code, if the CST determines an evaluation is not warranted, within fifteen days the parent is provided written notice. If the CST determines that an evaluation is warranted, the student is considered identified as potentially being a student with a disability and a case manager is assigned.

According to teachers who participated in the staff survey:

- Over 63% of general education agreed or strongly agreed they fully understand the steps and timelines associated with the referral process and over 69% agreed they are comfortable recommending a student be referred for a special education evaluation.
- However, over 44% of general education teachers reported that staff in their school(s) fully understand the steps and timelines associated with the referral process. This statement is consistent with special education teachers; over 40% those who participated in the survey agreed with that statement.

According to parents who participated in the parent survey, of the 127 parents who responded to the question: "Who initiated the request for an evaluation for special education for your child?

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[34] Data for the following race/ethnicity and disability categories were suppressed due to n<5: Asian - Emotional Regulation Impairment, Multiple Disabilities; Black or African American – Emotional Regulation Impairment, Multiple Disabilities; Hispanic – Emotional Regulation Impairment, Multiple Disabilities; Two or more races – Emotional Regulation Impairment.

- Over 48% reported the parent; over 30% reported the school; over 17% reported their child had an IEP from another district and transferred into PPS; and over 3% came from a Head Start Program.

According to parents who participated in the parent survey, of the 127 parents who answered the question: "Do you believe the referral for a special education evaluation was made in a timely manner?"

- Over 80% responded "yes;" over 19% responded "no."

According to special education administration:

- "There are a significant number of parent referrals; also, situations where my child's teacher or counselor told me to write this letter."
- "There is a need to us[e] the I&RS process more frequently."
- "The goal is to make a data informed eligibility determination."

EVALUATION AND DETERMINATION OF ELIGIBILITY

When a CST determines that a child may have a disability, within fifteen days following their meeting with the child's parent, the district seeks a written request for consent from the parent (or adult student when they are age 18 or older). When the assessments are completed, a written report of the results of each assessment is prepared. A copy of the evaluation report(s) and documentation and information that will be used for a determination of eligibility shall be given to the parent not less than 10 calendar days prior to the meeting. After consent for initial evaluation has been received, the evaluation, determination of eligibility of services, and, if eligible, the development and implementation of the IEP are to be completed within ninety calendar days.

Of the respondents of the teacher survey:

- Over 90% of special education teachers agree or strongly agree that special education evaluations are sufficiently comprehensive to identify students' specific strengths and needs.
- Over 77% of special education teachers agree or strongly agree the results of special education evaluations are shared with me in ways that provide meaningful insights into students' educational needs.

Of the 128 parents who responded to the parent survey question: "I was provided materials (such as reports, data for IEP goal development) prior to my child's most recent IEP meeting."

- Over 89% responded "yes;" over 10% responded "no."

Of the 114 parents who responded to the parent survey question "I was provided adequate time to review these materials prior to my child's IEP meeting."

- Over 95% responded "yes;" over 4% responded "no."

Furthermore, parents who participated in the survey shared positive responses with their overall experiences regarding the eligibility and evaluation process:

EXHIBIT 9: PARENT SURVEY RESPONSES REGARDING ELIGIBILITY AND EVALUATION

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
The school/district fully explained the	51	39.8%	62	48.4%	6	4.7%	6	4.7%	3	2.3%	128

	Strongly Agree										
eligibility/IEP process.											
The initial evaluation(s) conducted by PPS were comprehensive and addressed my child's needs.	51	40.5%	49	38.9%	15	11.9%	7	5.6%	4	3.2%	126

In addition, parents shared strong positive experiences regarding the overall process regarding IEP meetings:

EXHIBIT 10: PARENT SURVEY RESPONSES REGARDING OVERALL IEP PROCESS

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
During my child's last IEP meeting, I felt I was a valued member of the team and my opinion was respected.	68	53.1%	45	35.2%	5	3.9%	6	4.7%	4	3.1%	128
During my child's last IEP meeting, the team discussed my child receiving special education services in the general education class to the maximum extent appropriate.	54	42.5%	52	40.9%	9	7.1%	5	3.9%	7	5.5%	127
The information I provided about my child during his/her	59	46.5%	53	41.7%	6	4.7%	5	3.9%	4	3.1%	127

most recent IEP meeting was considered when planning and writing the IEP.										
I feel comfortable asking questions and expressing concerns at IEP meetings.	67	52.8%	48	37.8%	4	3.1%	4	3.1%	4	3.1%	127
Adequate time is allotted for the IEP meeting to discuss my child's needs.	58	45.7%	58	45.7%	3	2.4%	4	3.1%	4	3.1%	127

English Learners with a Suspected Disability

English Learners (ELs) and Recently Arrived Immigrant English Learners (RAIELs) are a highly diverse group, encompassing important subgroups such as students born in the United States whose home language is one other than English or with refugee status, unaccompanied minors, and students with limited or interrupted formal education. ELs and RAIELs enter schools at all grade levels, with varied initial English proficiency levels, educational backgrounds, and home language literacy levels. These students bring unique and valued strengths to the classrooms, but also frequently face shared challenges. While RAIELs share with other ELs a common need to acquire English proficiency, they also often have needs that non-recently arrived ELs do not typically have. These include mental, physical, and social needs that are shaped by dislocation and trauma exposure; academic needs that pertain to limited or interrupted prior formal schooling; and adjustment to the norms and characteristics of a new country, community, and school setting. Given this wide range of challenges, it is no surprise that education agencies struggle to develop policies and practices that adequately address both the ELs' and RAIELs' needs.

As noted in a July 2015 WestEd study, which included an extensive review of the literature and research across schools, districts, and states, two factors were identified that lead to inconsistent identification of students who may have learning disabilities: 1) a lack of understanding among teachers about why EL students are not making adequate progress, and 2) a poorly designed and implemented referral processes. The study also reviewed state guidelines and protocols from 20

states with the largest populations of EL students on the practices of how they identify and support ELs who have disabilities.[35]

In 2019-20, 5.0% of students in PPS were English learners. The percentage of students with IEPs who were also English learners was 7.6%.[36]

EXHIBIT 11: PERCENT OF STUDENTS WITH IEP (AGES 6-21) BY EL STATUS, 2019
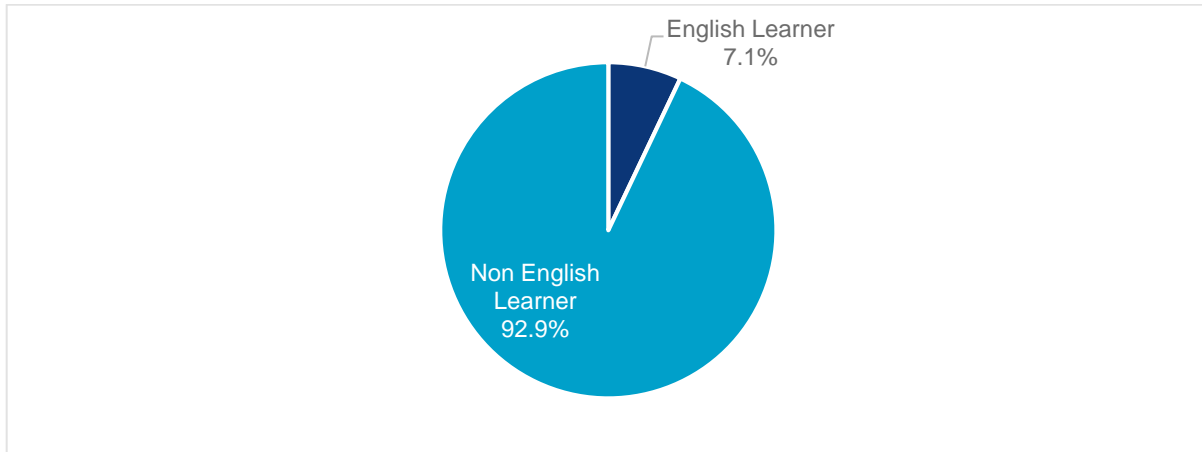
- Over 77% of special education teachers agree or strongly agree that prior to a referral for special education, the impact of a child's native language on academic performance or behavior is considered.
- Over 26% of special education teachers reported they did not know if services for dually-identified (English Language Learner students with disabilities) students at my school(s) are meeting student needs; over 36% of special education teachers disagreed or strongly disagreed that services for dually-identified (English Language Learner students with disabilities) students at my school(s) are meeting student needs.

According to district administration, making determinations for students who grow up in non-native English-speaking homes has been a challenge. The district continues to complete an increase in bilingual evaluations, yet CSTs still have challenges in determining the impact of language on achievement.

According to administration, EL students are integrated in all schools and EL students with IEPs are also receiving services at the Community Park Elementary School, which is a dual language immersion school. Furthermore, EL students who may be academically struggling receive bilingual AIS at Community Park.

CLASSIFICATION OF STUDENTS WITH DISABILITIES

Between 2017-2020, the percent of students ages 5-21 receiving special education services varied between a high of 17.5% in 2018-19 and a low of 16.4% in 2019-20.[37] Over these three years, the rates aligned with statewide averages.

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[35] Elizabeth Burr, Eric Haas, Karen Ferriere. Identifying and supporting English learner students with learning disabilities: Key issues in the literature and state practice, WestEd July 2015. Pages 2-14.
https://ies.ed.gov/ncee/edlabs/regions/west/pdf/REL_2015086.pdf
[36] Data provided by PPS in 2020. Data for the following disability categories were suppressed due to n<10: Deaf, Developmental Delay, Hearing Impairment, Intellectual Disability, Orthopedic Impairment, and Traumatic Brain Injury
[37] District and State data obtained from NJ School Performance Report: https://rc.doe.state.nj.us/

EXHIBIT 12: PERCENTAGE OF PPS STUDENTS WITH IEPS COMPARED TO STATE INCIDENCE RATES (AGES 5-21), 2016-17 TO 2019-20
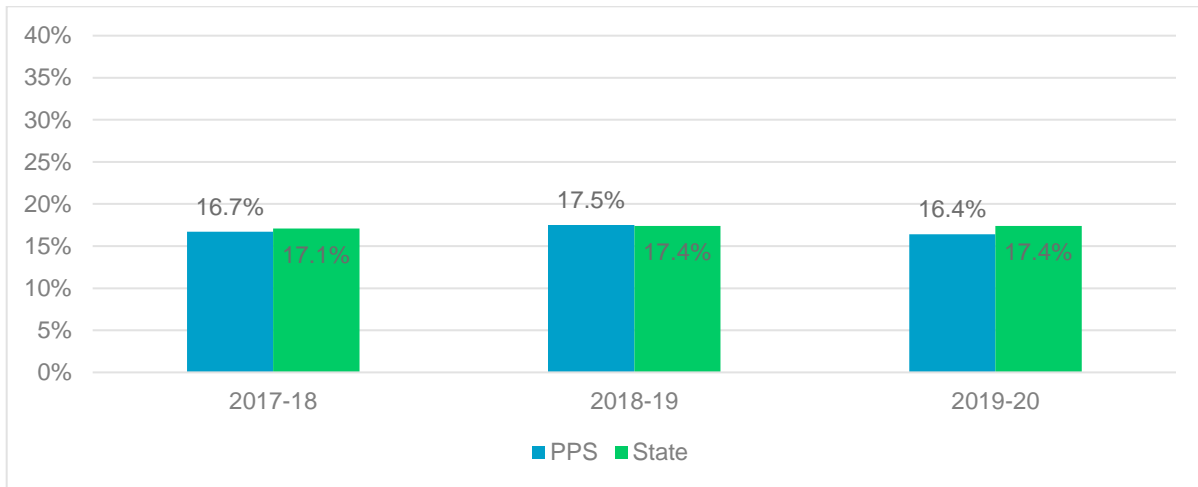
In FFY 2017, PPS's incidence rate for students with autism (13.2%) was higher than the state (8.9%) and nation (10.3%). PPS's identification rate for students with an other health impairment (23.0%) was higher than the state (21.7%) and nation (16.2%). PPS's rate for students with a specific learning disability (34.4%) was aligned with the state average (34.3%) and lower than the nation (39.2%).[38]

Incidence Rates by Primary Disability Area
EXHIBIT 13: PERCENTAGE OF PPS STUDENTS WITH IEPS BY DISABILITY AREA COMPARED TO STATE AND NATION (AGES 6-21), FFY 2017

	All disabilities	Autism	Emotional Regulation Impairment	Intellectual Disabilitiy	Other Health Impairment	Specific Learning Disability	Speech or Language Impairments
■ PPS	16.7%	13.2%	4.5%	0.0%	23.0%	34.4%	22.6%
■ State	17.1%	8.9%	3.5%	2.4%	21.7%	34.3%	21.2%
■ Nation	13.4%	10.3%	5.6%	7.0%	16.2%	39.2%	17.1%
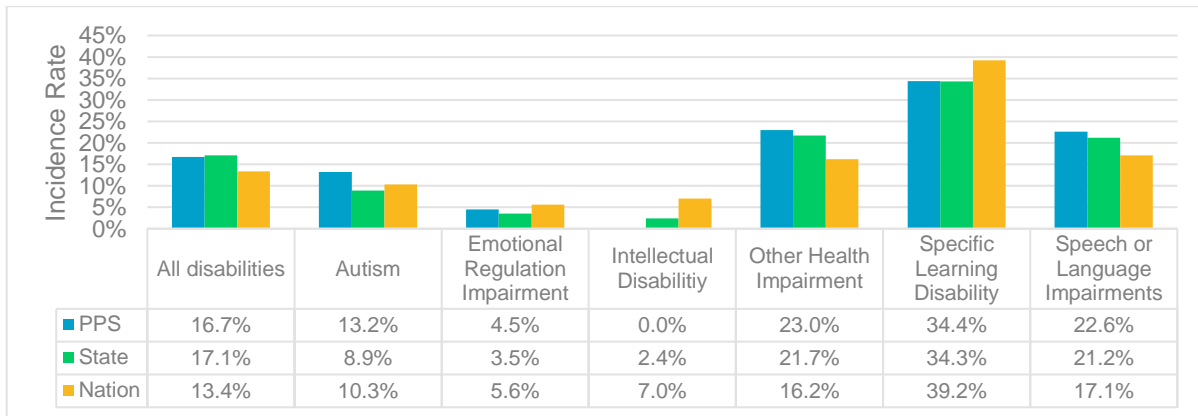
Incidence Rate by Race/Ethnicity
The following charts detail the incidence rates of students with IEPs in PPS by race/ethnicity.[39]

In 2019-20, of the total students enrolled in PPS, 49.9% were white, 21.3% were Asian, 15.5% were Hispanic, 7.6% were two or more races, and 5.7 were Black or African American. Of the students with IEPs, 45.4% were white, 26.5% were Hispanic, 12.7% were Black or African American, 9.9% were Asian, and 5.5% were two or more races.

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[38] District data obtained from NJ Special Education Data: https://www.nj.gov/education/specialed/data/2019.htm#class. Due to small n sizes, data for students with intellectual disabilities was suppressed. State and Nation data obtained from OSEP Grads360: https://osep.grads360.org/#communities/pdc/documents/19603
[39] District data provided by PPS in 2020

The exhibit below compares the percentage of students with and without IEPs within each race/ethnicity category. Of all white students, 16.4% had an IEP compared to 40.0% of Black or African American students, 33.5% of Hispanic students, 13.9% of students with two or more races, and 8.8% of Asian students.

EXHIBIT 15: PERCENT OF PPS STUDENTS WITH AND WITHOUT IEPS (AGES 5-21) BY RACE/ETHNICITY, 2019[41]
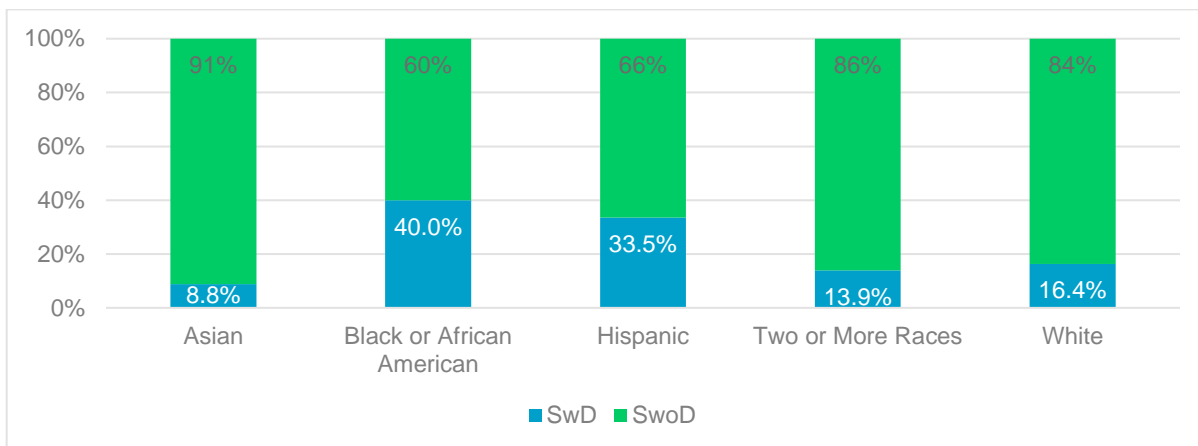
Data indicated the prevalence of disability types for certain races/ethnicities higher than district demographics, with variations in disability categories.[42] Key differences, displayed in the graph below, include:

- White students accounted for 57.0% of students identified with an emotional regulation impairment and 52.0% of students with an other health impairment. These percentages were higher than the overall percentage of white students with an IEP (45.4%).

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[40] Data for the following Race/Ethnicity categories were suppressed due to n<10: American Indian or Alaskan Native and Native Hawaiian or Pacific Islander

[41] *Id.*

[42] Data for the following disability categories were suppressed due to n<10: Deaf, Developmental Delay, Hearing Impairment, Intellectual Disability, Orthopedic Impairment, and Traumatic Brain Injury

- Hispanic students accounted for 32.6% of students identified with a specific learning disability and 27.8% of students with multiple disabilities. These percentages were higher than the overall percentage of Hispanic students with an IEP (26.5%).
- Black or African American students accounted for 19.0% of students identified with an emotional regulation impairment, 16.7% of students identified with multiple disabilities, 13.3% of students with an other health impairment, and 13.1% of students with a specific learning disability. These percentages were higher than the overall percentage of Black or African American students with IEP (12.7%).

EXHIBIT 16: PERCENTAGE OF PPS STUDENTS (AGE 5-21) BY DISABILITY AREA AND RACE/ETHNICITY, 2019-20

	Autism	Emotional Regulation Impairment	Multiple Disabilities	Other Health Impairment	Specific Learning Disability	Speech or Language Impairmentss
■White	39.8%	57.1%	38.9%	52.0%	44.1%	45.2%
■Two or more races	8.6%	0.0%	0.0%	5.2%	4.7%	6.4%
■Hispanic	18.3%	19.0%	27.8%	21.4%	32.6%	26.1%
■Black or African American	9.7%	19.0%	16.7%	13.3%	13.1%	12.1%
■Asian	23.7%	4.8%	16.7%	8.1%	5.5%	10.2%
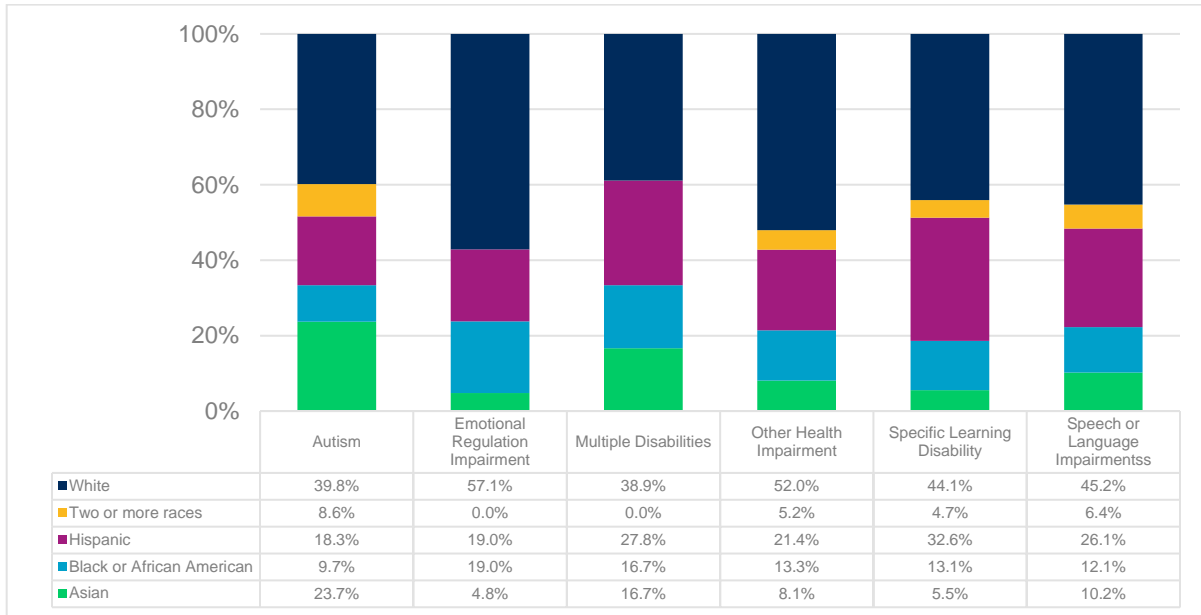
Incidence Rates by Gender

Overall, 67.6% of PPS students with IEPs were male, and 32.4% were female. These percentages align with the national data, wherein roughly two-thirds of students receiving special education services were male (66%), and one-third (34%) were female.[43]

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[43] Data Source - National Center for Education Statistics:
https://nces.ed.gov/programs/digest/d19/tables/dt19_204.50.asp?current=yes
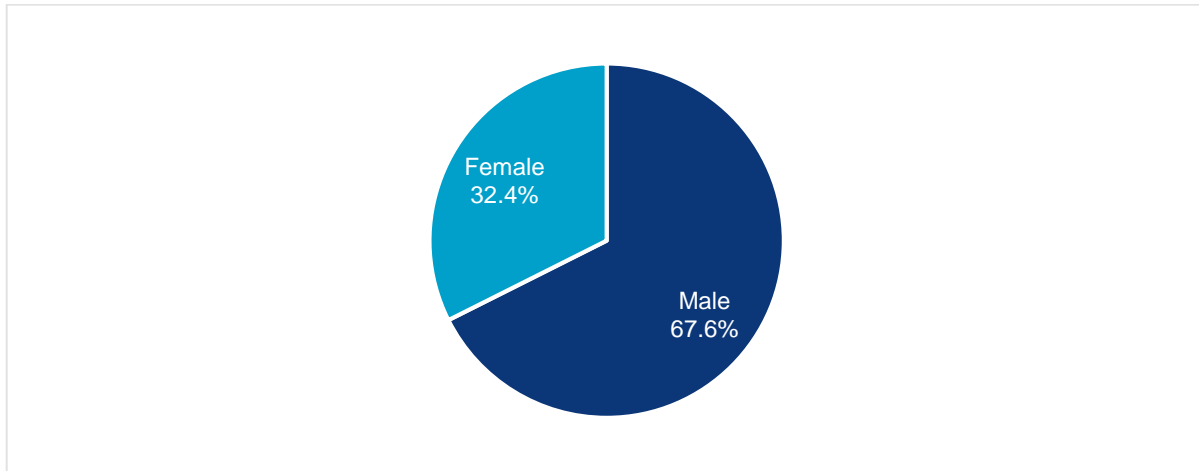
Male students comprised the majority of students identified in all disability categories. The percentage of males identified in the following disability categories was higher than the overall IEP average for males (67.6%): autism (84.0%), multiple disabilities (72.2%), and other health impairment (71.8%). Female students with IEPs accounted for 42.9% of students with an emotional regulation impairment and 40.2% of students with a specific learning disability.

EXHIBIT 18: PERCENT OF PPS MALE VS. FEMALE STUDENTS WITH IEPs (AGE 5-21) BY DISABILITY, 2019-20
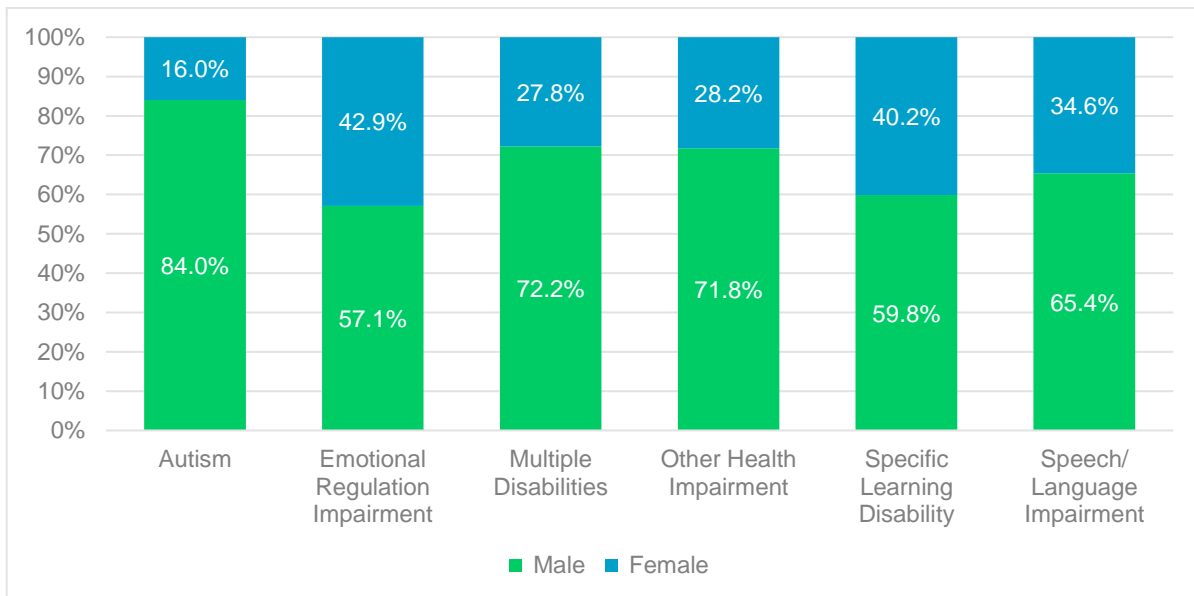
PLACEMENT AND CONTINUUM OF SERVICES

For students with disabilities to improve their academic achievement and reduce the achievement gap with their nondisabled peers, they must be included in the core curriculum and receive evidence-based interventions that are targeted and implemented with fidelity.

Schools also need to create an environment in which each student is expected to learn, be supported and demonstrate learning at high levels. All teachers need more training and support throughout the school year to confidently implement differentiated instruction, accommodations and modifications, and specially designed instruction.

- Over 78% of special education teachers and 73% general educators agree or strongly agree that PPS offers a continuum of services to meet the needs of all students with IEPs.

Special education administration noted the following about the district's continuum of services:

- o Strengths
  - "The district offers a strong continuum of services because it offers so much."
  - "Timely issues only arise when teams do not communicate needs until the end."
    - A Special Education Department mantra about communication to support students services: "Early and often;" even if you are not sure – talk to the Director of Special Education about what student might need so the supports can be available
  - Central office administrators know that if something is required in the IEP, they are going to make that happen
- o Concerns
  - Physical space – need to build more facilities
  - If PPS were to build another self-contained program, is there space in the district to house that?

Program Offerings

As of the 2020-21 school year, the district provides the following special education programs:

- **Community Park School**
  - o Preschool Disability – 1
  - o Resource – all grade levels
  - o In-class resource – currently in grades: 2nd and 4th

- **Johnson Park School**
  - o Preschool Disability – 1
  - o Learning and Language Disability – Mild/Moderate – primary and upper elementary classes
  - o Resource – all grade levels
  - o In-class resource – currently in grades: 2nd, 4th and 5th grades

- **Littlebrook School**
  - o Preschool Disability – 1
  - o Resource – all grade levels
  - o In-class resource – currently in grades: 4th and 5th

- **Riverside School**
  - o Autism – 3 classes
  - o MD class
  - o Resource – all grade levels
  - o In-class resource – currently in grades: 2nd, 3rd, and 4th grades

- **Princeton Unified Middle School**
  - o Autism – 1 class
  - o MD – 1 class
  - o LLD – sections
  - o Resource – all grade levels
  - o In-class support – all grade levels

- **Princeton High School**
  - o Autism – 1 class
  - o LLD – sections
  - o Bridges to the Future – BD program – sections

- o School to Work program
- o Resource – all grade levels in courses required for graduation
- o In-class support – all grade levels in courses required for graduation

According to district administration, there is elementary resource language and math at each elementary school building; also, In Class Resource (ICR) programs are offered at all elementary schools. However, the only school in the district to have ICR in all grade levels within the building is the middle school. In addition, ICR is only offered in high school classes in all grade level courses.

At the middle school, Resource sections offered for English, math, science and social studies each year (6-8). Additionally, support classes are offered 1 to 3 times each week (focus on organization, planning and goal setting, review and reinforcement of concepts, review for tests). Additionally, in order to provide intensive support for LAL skills, some students take a Reading/Writing Lab class.

At the high school, all content area courses required for graduation are offered with ICR support (English, math, science and social studies). Academic Support classes are available to students who require help with organization, planning and goal setting, review and reinforcement of concepts and test prep. Furthermore, students classified as Language and Learning Disabled and Autism can also take an Adult Daily Living class which teaches basic skills needed to increase independence in food prep, housekeeping chores, shopping and communication.

Educational Setting

The data in this section reflect the educational settings of PPS school-aged students overall, by disability areas and race/ethnicity.[44] In addition, District data are compared to state data.

Overall Educational Setting Data for PPS and State

In 2019-20, PPS students with disabilities were educated less frequently in an inclusive general education setting. Of all students with IEPs, 53.3% spent more than 80% or more in the general education classroom, 30.7% spent between 40-79% of their day in the general education classroom, 13.5% of students spent less than 40% of their day in the general education setting, and 2.5% of students were in a separate placement. Compared to state data, a larger percentage of PPS students spent 80% or more of their school day in the general education setting (53.3%) compared to the state (47.2%).

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[44] District and State data obtained from NJ Special Education Data Reports available at: https://www.nj.gov/education/specialed/data/

EXHIBIT 19: PERCENTAGE OF PPS STUDENTS (AGE 5-21) BY EDUCATIONAL SETTING COMPARED TO STATE, 2019-20

	≥80%	40-79%	<40%	Separate
■ PPS	53.3%	30.7%	13.5%	2.5%
■ State	47.2%	29.8%	15.8%	7.2%
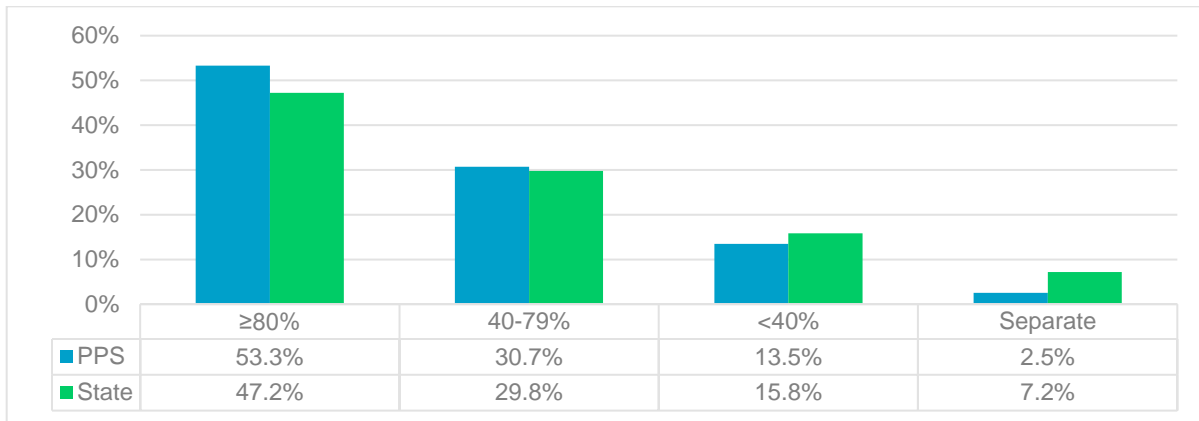
Educational Setting by Primary Disability Area

The charts below provide analysis on PPS students by primary disability area and education setting.[45] Comparison with state data is also included.

General Education Setting 80% or more of the time. Students identified in the following disability categories were included in the general education setting at a higher rate than the district average of 53.3%: other health impairment (68.8%) and speech or language impairment (70.7%). Primary disabilities of autism (17.6%) and specific learning disabilities (48.3%) were included in this setting at a lower rate than the all disability average.

General Education Setting less than 40% of the time. Overall, 13.5% of students with an IEP in PPS were educated in the general education setting less than 40% of the time. Students with autism (42.9%) and speech and language impairments (17.1%) were included in this setting at a higher rate than the all disability average.

Separate Setting. Overall, 2.5% of students with an IEP in PPS were educated in a separate setting. Students with autism (15.4%) were included in this setting at a higher rate than the all disability average.

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[45] NJ Jersey suppressed data for all educational settings for the following disability categories due to small population size : Emotional Regulation Impairment. Setting data for ≥80% setting was suppressed for the following disability category: Hearing Impairment and Orthopedic Impairment. Setting data for the 40-79% setting the following disability cateogries was suppresses: Intellectual Disabilities, Multiple Disabilities. Setting data for <40% category was suppressed for the following disability categories: Multiple Disabilities and Other Health Impairment. Setting data for separate settings was suppressed for the following disability cateogries: Hearing Impairment, Intellectual Disabilities, Multiple Disabilities, Other Health Impairments, and Specific Learning Disability.

	Autism	Other Health Impairment	Specific Learning Disability	Speech or Language Impairments	District Overall
Separate	15.4%	0.0%	0.0%	0.0%	2.5%
<40%	42.9%	0.0%	7.6%	17.1%	13.5%
40-79%	24.2%	31.2%	44.1%	12.2%	30.7%
≥80%	17.6%	68.8%	48.3%	70.7%	53.3%
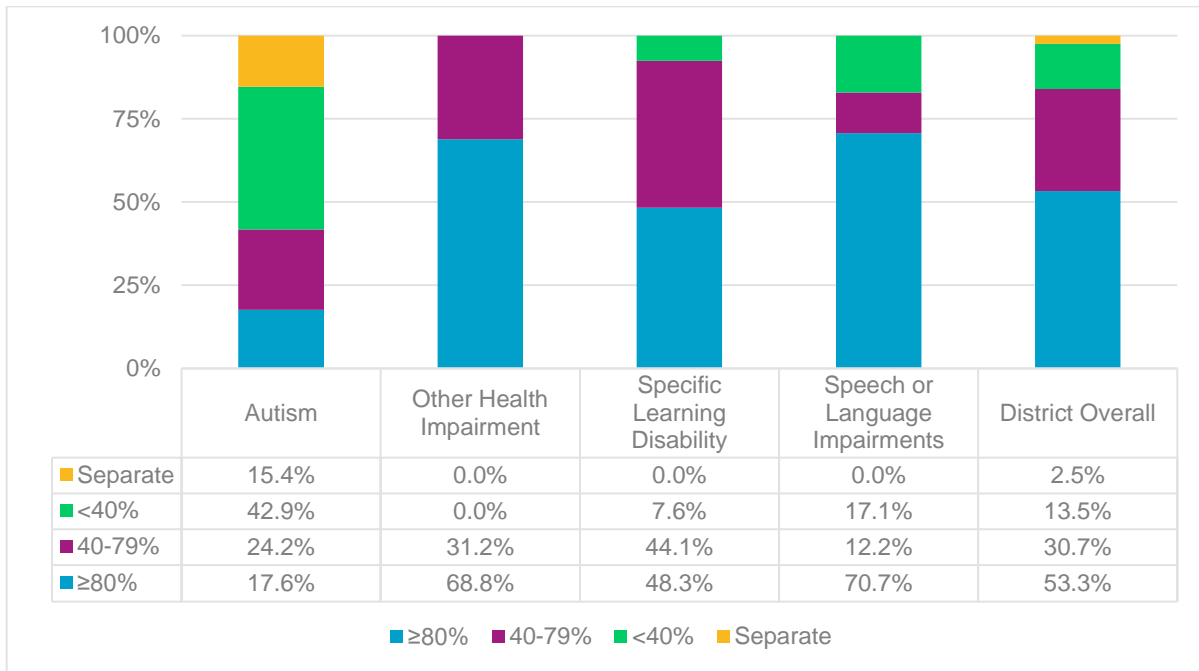
Other Health Impairments, Specific Learning Disability

The following comparative analysis was completed on the two most inclusive educational settings: ≥80% and 40-79% by disability category for PPS and the state.[46]

Other Health Impairments. PPS students with an other health impairment were educated at a higher rate in general education for more than 80% of the time (68.8%), compared to the state (52.2%).

Specific Learning Disability. Of PPS students with a specific learning disability, 48.3% spent 80% or more of their day in the general education setting compared to 52.2% of students in the state. A slightly larger percentage of PPS students with a specific learning disability spent 40-79% of their day in general education (44.1%) compared to the state (37.7%).

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[46] District data provided by PPS in 2020. State data obtained from NJ Special Education Data Reports available at: https://www.nj.gov/education/specialed/data/

	Other Health Impairment		Specific Learning Disability	
	PPS	State	PPS	State
■ 40-79%	31.2%	32.1%	44.1%	37.7%
■ ≥80%	68.8%	52.2%	48.3%	52.2%

■ ≥80% ■ 40-79%
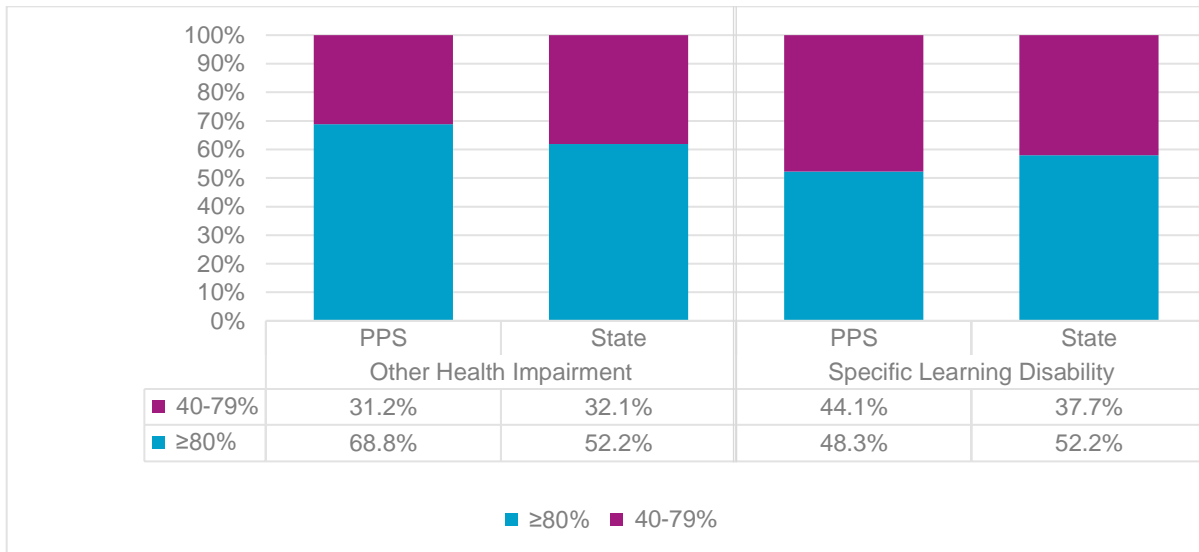
Educational Setting by Race/Ethnicity

In 2019-20, students with the following races/ethnicities were included in the general education setting for 80% or more of their school day above the overall district average (54.2%): white (65.0%) and Asian (67.4%).[47] Black or African American students and Hispanic students with disabilities had the lowest rate of inclusion in the general education setting at 28.6% and 38.5%, respectively. A larger percentage of Black or African American students and Hispanic students spent between 40%-79% of their school day in the general education setting, 54.3%, and 37.9%, respectively, compared to other race/ethnicity groups.

EXHIBIT 22: SETTING BY RACE AND ETHNICITY, 2019-20

	Asian	Black or African American	Hispanic	White	Overall
■ Separate	0.0%	0.0%	0.0%	4.7%	2.1%
■ <40%	0.0%	17.1%	23.6%	7.8%	12.8%
■ 40-79%	32.6%	54.3%	37.9%	22.6%	30.9%
■ ≥80%	67.4%	28.6%	38.5%	65.0%	54.2%

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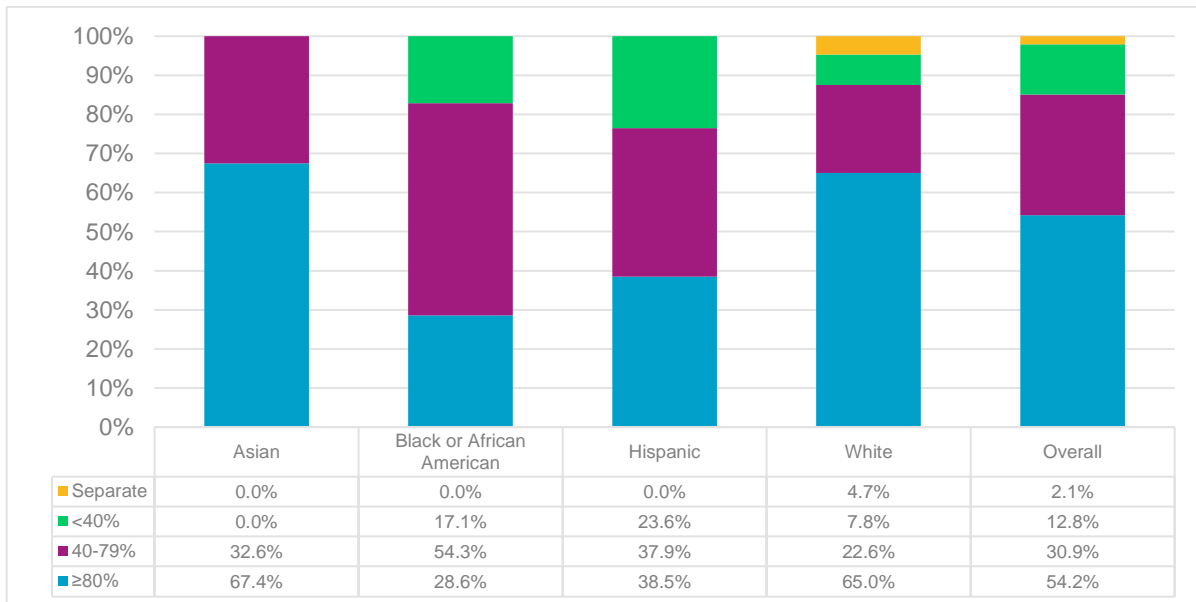
[47] New Jersey suppressed data for the following placement settings and race/ethnicity categories due to n<10: 40-79% - two or more races; <40% - Asian and two or more races; Separate setting – Asian, Black or African American, Hispanic, two or more races.

According to parents who participated in the survey, many parents responded favorably toward the delivery of special education services their child receives:

EXHIBIT 23: PARENT SURVEY RESPONSES, DELIVERY OF SERVICES

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
The staff working with my child have read and fully reviewed their IEP.	36	29.8%	35	28.9%	15	12.4%	1	0.8%	34	28.1%	121
The staff working with my child implement their IEP with consistency.	33	27.3%	40	33.1%	24	19.8%	3	2.5%	21	17.4%	121
There is an adequate number of staff to implement my child's IEP with consistency.	34	28.1%	54	44.6%	12	9.9%	4	3.3%	17	14.0%	121
General and special education teachers collaborate in planning and delivering instruction to my child.	30	24.8%	39	32.2%	15	12.4%	7	5.8%	30	24.8%	121
Special education teachers and paraprofessionals collaborate in planning and delivering instruction to my child.	36	30.5%	40	33.9%	15	12.7%	3	2.5%	24	20.3%	118
My child's teachers have high expectations for them.	32	26.9%	52	43.7%	16	13.4%	4	3.4%	15	12.6%	119
I am satisfied with my child's overall special education services.	39	32.2%	48	39.7%	22	18.2%	8	6.6%	4	3.3%	121

One of the schools where concerns were raised about program availability was at Community Park Elementary School. One of PPS' schools, Community Park Elementary School, is a Dual Language program. According to the district, "…students in Kindergarten through 5th grade spend approximately 50 percent of their core academic day learning in Spanish and the other 50 percent learning in English. This

means every DLI student has two main teachers, one for English instruction and one for Spanish. In our program, students learn math, science, and Spanish language arts in Spanish, and language arts and social studies in English. Specials, such as physical education, music, or library, are taught in English. This 50-50 model allows students to maintain proficiency in their native language while adding a second language. Around mid-year students will speak only in Spanish during the Spanish class and only in English during the English portion of the day. At the completion of elementary school, students will be on their way to becoming biliterate and bilingual in both Spanish and English. Research has shown that this DLI model is highly successful at teaching grade-level content while developing impressive levels of language proficiency in students."

Unlike other districts which may configure its dual language program as a magnet school or a school-within-a-school, Community Park is the feeder school for specific neighborhoods in Princeton. According to parents, teachers, and administrators, this configuration can be particularly problematic for children with disabilities who may struggle with learning in a second language. This configuration causes families of children with disabilities to choose to go to another elementary school in the district. Alternatively, children may begin programming at Community Park but struggle mightily because there are so few special education resources to support students with disabilities in a dual language environment. Consequently, there are reportedly few students with low incidence disabilities at Community Park.

Nevertheless, it was noted that students with disabilities who often benefit the most from the dual language immersion program at Community Park are EL students with IEPS. This has been especially helpful in PPS as the number of Spanish speaking students in the community has increased. Furthermore, struggling EL students who may later qualify for having a disability also benefit from bilingual AIS supports offered at Community Park.

HIGH QUALITY IEPS TO SUPPORT A STUDENT'S INDVIVIDUALIZED PROGRAM
Present Levels of Academic and Functional Performance

In a student's IEP, the PLAAPF statement serves as the starting-point for IEP goalsetting. It is one of the most critical components of the IEP and serves as a snapshot of the student at a specific time and place, providing team members with details on the student's academic achievement and functional performance. A well-crafted PLAAFP statement includes qualitative and quantitative data from a variety of educators and school staff using sources that include:

- Performance and mastery of last year's goals;
- New special education assessment results;
- Performance on district and statewide assessments, including identification of skills and knowledge already attained in relation to grade-level standards;
- Classroom grades and observations, including behavior data;
- Input from the students and parents;
- Interests and strengths, including non-curricular areas; any strategies, accommodations, or assistive technology devices or services that have already shown success;
- Skills in daily living such as social skills, mobility skills, employment skills, and skills that promote student independence.

PLAAFP statements must include functional skills. Research provides evidence supporting the notion that when functional skills are not included, students' long-term, independent-living outcomes are diminished.[48] In addition, the PLAAFP should provide information on all goals later covered in the IEP. For example, a 14-year old child's transition goals should be rooted in baseline transition data that is clearly listed in the PLAAFP.

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[48] In 2011, Auers, Lowrey, Douglas, and Sievers analyze their findings in a journal article appropriately titled: I Can Identify Saturn, but I Can't Brush My Teeth: What Happens When the Curricular Focus for Students with Severe Disabilities Shifts.

As required through IDEA and N.J.A.C. 6A:14-3.7(e)1, members of the IEP team must annually document a student's PLAAPF. In doing so, IEP teams must consider relevant data and list the sources of information used to develop the IEP. Team members must describe the present levels of academic achievement and functional performance including how the student's disability affects his or her involvement and progress in the general education curriculum. For preschool children, as appropriate, team members must describe how the disability affects the child's participation in appropriate activities.

Team members also must include other educational needs that result from the student's disability. In addition, team members must consider special factors: behavioral needs; language needs; communication needs; auditory needs; the need for assistive technology devices and services; and visual needs. If in considering the special factors, the IEP team determines that the student needs a specific device or service to receive a free, appropriate public education, the IEP must include a statement to that effect in the appropriate section. If a factor is not applicable, that must also be noted.

PLAAFP Statements in PPS

During the file review focus groups that PCG conducted, the following items were observed:

- PLAAFP statements were often significantly improved following the review of the Director of Special Education (e.g. inclusion of eligibility of statement where one was not included before); the was only specific to case managers who were non tenured
- Inclusion of strengths;
- Inclusion of parent input, both positive, neutral, and of concern;
- CST concern regarding general education teacher input; often could be better, incomplete, or missing because teacher not responding;
- CST concern regarding special education teacher input; often could be better, incomplete, or missing because teacher not responding in a timely manner;
- Lack of data, both existing data from evaluations or teacher data because of lack of feedback;
- Limited to no information provided by students, especially age 14+.

Special education administration and teachers expressed frustration that general education teachers (and sometimes special education teachers) are not held accountable by building principals after CST members make requests for PLAAFP content and it is not submitted at all, or not done in a timely manner.

On the whole, the IEPs of non-tenured case managers had significantly better PLAAFP statements, particularly IEPs that were reviewed by the Director of Special Education and subsequently revised.

Annual IEP Goals

Annual IEP goals that are ambitious, relevant, and measurable are an extraordinarily important part of the IEP process. Systematic, ongoing assessment and reporting of student progress enables educators to "substantiate what the student is learning, the effectiveness of materials and methods being used during instruction, and the efficacy of the IEP."[49]

The importance of well-written IEP goals recently came to light in the recent US Supreme Court case of Endrew F. v. Douglas County School District.[50] In this decision, the Court updated its prior standard for determining a school district's provision of an appropriate education for students with disabilities. This case centered on the importance of establishing ambitious and challenging goals that enable

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[49] Gleckel & Koretz, 2008, p. 211
[50] Retrieved from https://www.supremecourt.gov/opinions/16pdf/15-827_0pm1.pdf

each student to make academic progress and functional advancement, and advance from grade to grade.

Progress for a student with a disability, including those receiving instruction based on alternate academic achievement standards, must be appropriate in light of his/her circumstances. Furthermore, yearly progress must be more demanding than the "merely more than de minimis" standards that had been used by some lower courts. For children with disabilities, receiving instruction that aims so low would be tantamount to "sitting idly . . . awaiting the time when they were old enough to 'drop out.'"[51] The IEP need not aim for grade-level advancement if that is not a reasonable prospect. But the IEP must be appropriately ambitious in light of the student's circumstances, just as advancement from grade to grade is appropriately ambitious for most children in the regular classroom. Goals may differ, but every student should have the chance to meet challenging objectives. The Court made it clear that IDEA demands more.

Considering Endrew, when developing IEP goals, teams should ensure the goals are "ambitious" in light of each student's circumstances. Repeating the same goals from year to year is not likely to meet this test. Rather, teams need to design goals that are reasonably calculated to enable students to be involved in and make progress in the general education curriculum, using alternate achievement standards when appropriate; and meet their other educational needs related to the disability. Although the Supreme Court did not address the delineation of IEP special education, related services, and supplementary aids/services, it is important to remember that IDEA requires a statement of these components to be "based on peer-reviewed research to the extent practicable."

Through IDEA and N.J.A.C. 6A:14-3.7, IEP teams are required to create annual measurable academic and/or functional goals for a student. Academic goals should be related to the New Jersey Student Learning Standards through the general education curriculum. Preschool academic goals should be related to the Preschool Teaching & Learning Expectations: Standards of Quality. Each goal should include benchmarks or short-term objectives as well as criteria to measure goal mastery. The goals/benchmarks/short term objectives must be: meeting the student's needs that result from the student's disability to enable the student to be involved in and progress in the general education curriculum; and meeting each of the student's other educational needs that result from the student's disability. As a best practice, we recommend that IEP goals be written using the SMART format -- Specific, Measurable, Achievable, Relevant, and Time-bound.

Annual IEP Goals in PPS
During the file review focus groups that PCG conducted, the following items were observed:

- Several instances where academic IEP goals were not SMART;
- Several instances where academic IEP goals addressed non-measurable study skills;
- Several instances where behavioral IEP goals were not SMART;
- Instances when deficiencies listed in the PLAAFP were not addressed in goals or vice versa;
- Instances where goals were SMART and aligned to the IEP after rejection by Director of Special Education

Non-tenured staff shared that the Director of Special Education notes when goals needed improvement within IEPs. Tenured case managers, in some cases, shared that additional support would likely improve the manner by which IEP goals are written. There were, at times, differences in IEP quality between tenured and non-tenured case-managers (specifically around IEP goals and PLAAFP writing). In addition, a number of people shared that the district's IEP case management system does not support the creation of SMART goals.

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[51] https://www.washingtonpost.com/politics/courts_law/supreme-court-sets-higher-bar-for-education-of-students-with-disabilities/2017/03/22/fcb7bc62-0f16-11e7-9d5a-a83e627dc120_story.html?noredirect=on&utm_term=.8d54086e9dd5

It is important to note that some administrators in special education believe that goals are consistently being written in a SMART format.

Accommodations

It is recognized that students with IEPs have a disability that significantly hinders their abilities to benefit from general education. As such, they require supports and accommodations to meet high academic standards and to fully demonstrate their conceptual and procedural knowledge and skills in ELA (reading, writing, speaking and listening) and math. These supports and accommodations should ensure that students receive access to multiple means of learning and opportunities to demonstrate knowledge, but retain the rigor and high expectations of the New Jersey Student Learning Standards.

Accommodations in PPS

At the high school, all accommodations are carefully monitored and their use by students is documented. Teachers are required to note whether or not students used the accommodations within the IEP; these notes are then reported directly to the Special Education Supervisor. High school case managers, although not remiss that they were not the required to mandate this process, noted they would like to be more aware of accommodation use. They noted they do not see the high school accommodation reports. According to the Special Education Supervisor, if accommodations are not being used by students, this information is brought to the IEP meeting and adjustments are made.

At the elementary and middle schools, case managers described the oversight of accommodation use as potentially unwieldy and voiced they would like a process like the high school. In both the middle and high schools, it was shared that parental pressures sometimes sway the over-selection of accommodations that are not used.

During PCG's classroom visits, it was difficult to discern if students were provided accommodations (other than being in a special class); or if there were individualized modifications to curriculum content, instruction, and/or assessment. For the majority of classroom visits these features could not be documented. With that said, accommodations and modification may not have been obvious to the observer. However, it is important to note this was likely because PCG conducted remote classroom visits because of the COVID-19 Pandemic.

Progress Reporting on IEP Goals

Progress monitoring is a scientifically-based practice used to assess a child's academic progress on IEP goals and evaluate the effectiveness of instruction. Progress monitoring tells the teacher, child, and family what a student has learned and what still needs to be taught. Individuals with Disabilities Education Act (IDEA) 2004 states that an IEP must contain a description of how the child's progress toward meeting the annual goals will be measured, and that periodic reports be provided. Progress monitoring is a separate activity from the progress reports that may be issued for all students in a school on a quarterly basis; they are specific to students with IEPs. Progress monitoring, however, includes qualitative and quantitative data on student progress that is directly linked to a student's IEP goals. In PPS, IEP progress reporting is quarterly.

Quarterly Progress Reporting in PPS

In PPS, many of the progress reports reviewed did not contain quantitative information. However, as it was noted by many participants, when goals are not SMART then it is challenging to write specific comments on student progress as it relates to goal measurement and attainment specific to a timeline.

However, there were quantitative notes within some progress reports. Participants noted that when a case is contentious, the team is more attentive to including quantitative progress data.

According to an administrator, the following challenges exist regarding progress reporting specifically at the high school:

- "Data collection is all over the place; and we need to work on it, more in the lower classes like autism [who are good at it]; we need to get better at it. Teachers use grades as data rather than any other avenues for data collection."

III. TEACHING, LEARNING, AND SPECIAL EDUCATION SUPPORT

Strengths	Opportunities
• District has expanded its In Class Resource (ICR) programming	• Middle school and high school need leadership to support a climate and culture of shared responsibility on co-teaching • Middle and high school need job embedded professional development on co-teaching • Special and general education teachers need to be held accountable when they do not support IEPs in a timely manner. • District needs to create a clear delineation of hierarchy of responsibilities such that when a teacher does not comply with an IEP request in a timely manner, they are held accountable by building administrator as well as Special Education Director.

REMOTE CLASSROOM VISITS

As a component to the overall review of any school districts' special education services, evaluators would implement a series of in-person visits using a random sample of classrooms. These classroom visits provide information that would be further used to triangulate other data sources such as interviews and focus groups. The classroom visits, typically, document a variety of classroom physical attributes as well as the presence of common research-based activities, strategies and interventions (evidence-based practices). The research literature has shown that the use of evidence-based practices is an important tool to accelerate student learning.[52] These practices are documented by the U.S. Department of Education which gives states and local school districts flexibility in choosing which of these activities, strategies, and interventions are most appropriate for their students with disabilities.

Due to the constraints presented by the COVID-19 Pandemic, the routine procedure of in-person classroom visits was not possible. Therefore, PCG used a protocol for virtual classroom visits that they developed and used in several other district reviews. The protocol is referred to as a Remote Classroom Observation Process and is designed to validate the presence and implementation of special education / inclusive practices and supports. This process was developed to recognize that not all elements of quality special education services can be observed under these unusual circumstances, yet there are core instructional practices, supplementary aid and services, and approaches to personalized instruction that would be evident within a virtual or hybrid classroom model. These included foundational attributers to learning environments such as Universal Design or Learning / Differentiated Instruction; as well as features of instruction.

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[52] Odom SL, Brantlinger E, Gersten R, Horner RH, Thompson B, Harris KR. Research in Special Education: Scientific Methods and Evidence-Based Practices. Exceptional Children. 2005;71(2):137-148. doi:10.1177/001440290507100201

Specially Designed Instruction

In order for all students, including those with IEPs, to meet high academic standards and fully demonstrate their knowledge and skills in reading, writing, speaking, listening and mathematics, their instruction must be flexible, yet challenging, and incorporate scaffolds and accommodations to overcome potential learning barriers. It is essential that that the curriculum be designed to enable all students to successfully access and engage in learning without changing or reducing instructional goals. In order to meet the needs of all diverse learners in the classroom it is important to implement UDL (in the general education classroom as solid core instruction), Differentiated Instruction, Accommodations and Modifications, and Specially Designed Instruction (SDI) based to the support access and success of the learners. Implementing such a balanced mix of appropriate supports while maintaining the integrity of the curriculum can be challenging but needed to support diverse learners.

It must also be remembered that the "I" in IEP stands for individualized and that the rate of learning for students with disabilities may be different, but not less. These students often need more time to master concepts through specialized approaches that are proven to be effective based on their instructional needs, measured performance, and recognized disability.

"Specially designed instruction" means adapting, as appropriate to the needs of an eligible child, the content, methodology, or delivery of instruction: (34 CFR 300.39(b)(3)).

    i.   To address the unique needs of the child that result from the child's disability; and

    ii.   To ensure access of the child to the general curriculum, so that the child can meet the educational standards that apply to all children within the jurisdiction of the local education agency.

SDI is the "heart and soul" of special education. Many school divisions across the nation have developed policies and procedure in order to clarify distinctions and provide guidance to help develop a common understanding on the best practices that will support the effective implementation of SDI. These guidance documents are intended to inform IEP teams, administrators, educators and practitioners as they determine the need for, plan, and implement SDI for students with disabilities who require an IEP. Central to this effort is to better define and improve the delivery of SDI with a growth mindset to support continuous improvement in special education and the provision of SDI.

These are approaches to the unique needs of the eligible students with disabilities that are adaptations to content, methodology or delivery of instruction. SDIs remove barriers that result from a student's disability and are highly prescriptive (and in the IEP). It was difficult to discern the SDIs used in these classroom visits and those that could be identified were infrequent. However, this may be due to artifacts of remote observation. In summary, SDI is what a teacher does to deliver information to the student that is different from what other students received. It may be instruction that is additional to what other students received and/or different methods or techniques to present the instruction not used with other students.

The following were identified as SDIs in one or several classroom visits:

- Explicit Direct Instruction
- Individualized Support
- Attention to specific IEP goals and objectives

In PPS, teachers shared the following through the staff survey:

- Over 45% of special education teachers and 59% of general education teachers disagreed or strongly disagreed that PPS has established standards for delivering co-teaching or collaborative instruction.
- Over 43.3% special education teachers and 61% general education teachers disagreed or strongly disagreed there is sufficient communication between general and special educators about the needs and progress of students with IEPs.

- Over 61% of special education teachers either disagree or strongly disagree with the statement that <u>staff in their building are provided adequate time and coverage to develop IEPs</u>.
- Over 45% of general education teachers responded that <u>they did not know if staff in their building are provided adequate time and coverage to develop IEPs</u>.
- Over 32% of general education teachers reported they disagree that they are confident in how to implement IEPs as written; compared to 93.6% of special education teachers who agree they are confident in how to implement IEPs as written
- Over 80% of special education teachers either <u>agree or strongly agree that Special education teachers at my school are used effectively to support the needs of students with IEPs</u>

Inclusive Instructional Practices in PPS

Inclusive Instructional Special Education Practices (Evidence-Based Instructional Strategies)

There has been significant attention and efforts to assure that teachers of students with disabilities are using special education practices that are well-documented within the research literature as being effective. These practices can be described within in the following categories:

EXHIBIT 24: EVIDENCE BASED PRACTICE DESCRIPTIONS

Type of Practice	Description
Emerging Practice *(Demonstrates a Rationale)*	Anecdotal Evidence of Effectiveness but research has not been conducted
Research-based Practice *(Weak)*	Evidence of Effectiveness has been demonstrated in some research but the practice does not clearly demonstrate improved students outcomes
Promising Practice *(Moderate)*	Evidence of positive effects on student outcome may be documented; however, there is insufficient number of studies to demonstrate a clear correlation.
Evidence-Based Practice *(Strong)*	Evidence is based on multiple high-quality research studies, that show consistent and positive effects on student outcomes (Cook, Smith, and Tankersley, 2012)

PCG documented the evidence based and promising practices in special education observed during the classroom visits. The aggregated results indicated that there were a variety of general instructional practices and approaches that are rooted in research and which occurred frequently across the general education classrooms. Some of these included:

- Well Developed and Executed Lessons that reflected appropriate stages from initiation to summation
- Well defined behavioral expectations within the classrooms

In regards to specific practices that have been known to assist students with special education needs, it was less evident and were not frequently observed during the classroom visits. These special education practices included:

- Use of Visual Supports
- Use of instructional technology
- Use of para-educators
- Co-teaching assorted models

Co-Teaching
The use of a co-teaching model that includes a general and special education teacher a strategy to provide inclusive education opportunities for students with disabilities which continues to gain

popularity across the United States. Co-taught classrooms are one method through which the expectations of inclusive education can be met for both students with and without disabilities.[53] Several models of co-teaching that are most often implemented within classrooms are reflected within the professional literature.[54] These models or approaches vary in their collaborative nature, ranging from methods in which one teacher plays a more primary role in planning and instruction than the other, to more collaborative, team-based approaches in which there is shared responsibility for planning and instruction. Friend and Cook (2012) describe six approaches to co-teaching that represent the essence of what occurs in co-taught classes. These approaches include one teach-one assist, one teach-one observe, station teaching, parallel teaching, alternative teaching, and team teaching. These models of co-teaching are hierarchical and represent the least to most collaborative approaches.[55]

It is widely accepted that there is a need to move toward the more collaborative approaches to co-teaching and a perception that these models are important in reaching a diverse student population.[56]These co-teaching methods may be best understood by teachers in terms of the roles and responsibilities of each educator suggested by this hierarchy of approaches. However, teams may use multiple approaches to co-teaching in their everyday practice, and variations in their approach to co-teaching may depend upon many factors.[57]

Co-teaching practices seem to be influenced by multiple factors across schools, teachers and teacher training, as well as across different cultures. These factors may include structural aspects of the co-teaching program, teachers' attitudes regarding co-teaching, and teachers' professional development in the use of co-teaching. Co-teaching experiences may vary across several structural factors, including the number of co-teaching pairs that an individual teacher works within any given day, the amount of time co-teachers spend together during the day, and the amount of time a co-teaching team has worked together. As an example of structural variation in co-teaching experiences, a teacher may work as part of a single co-teaching pair throughout the full school day or alternatively, an educator may co-teach for only one period of the school day during instruction for a single content area. Teachers may also work in numerous co-teaching teams throughout the day for instruction of different groups of children or across different content areas.

Co-Teaching in PPS

Based on PCG's observations and according to district administration, co-teaching is strong at the elementary schools. At the middle school and high school however, there is still a need to "break down barriers". Furthermore, based on information gathered from focus groups and the staff survey, a hinderance at all of the schools is common planning time for effective co-teaching. District administration also shared the following about co-taught instruction in PPS:

- Co-teaching models determined by individual student IEPs

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[53] Friend, M., L. Cook, D. Hurley-Chamberlain, and C. Shamberger. 2010. " Co-teaching: An illustration of the complexity of collaboration in special education." Journal of Educational and Psychological Consultation 20: 9-27.
[54] Friend, M., and L. Cook. 2012. Interactions: Collaboration skills for school professionals (7th edition). New York, NY: Pearson Publishers; Villa, R. A., J. S. Thousand, and A. I. Nevin. 2013. A guide to co-teaching: New lessons and strategies to facilitate student learning. (3rd ed.) Thousand Oaks, CA: Corwin Press, Inc. Walther-Thomas, C. S. 1997. "Co-teaching experiences: The benefits and programs that teachers and principals report over time." Journal of Learning Disabilities 30: 395-407.

[55] Friend, M., and L. Cook. 2012. Interactions: Collaboration skills for school professionals (7th edition). New York, NY: Pearson Publishers.
[56] Villa, R. A., J. S. Thousand, and A. I. Nevin. 2013. A guide to co-teaching: New lessons and strategies to facilitate student learning. (3rd ed.) Thousand Oaks, CA: Corwin Press, Inc.
Walther-Thomas, C. S. 1997. "Co-teaching experiences: The benefits and programs that teachers and principals report over time." Journal of Learning Disabilities 30: 395-407.
[57] Gurgur, H., H., and Y. Uzuner. 2010. "A phenomenological analysis of the views on co-teaching applications in the inclusion classroom." Educational Sciences: Theory and Practice 10: 311-331.

- Other supports: AIS teacher assistance, push-in AIS teacher exist and may support students with disabilities; although AIS is not a special education initiative
- It is a district goal is to have a true co-teaching model where teachers share responsibility for educating all students and planning together to address needs for all students.
  - However, the reality of the situation is that this does not occur in all classrooms. District administration believes schools have made progress in the past 2-3 years but there is more work to be done
  - Evaluation and supervision of teachers and co-teachers owned by supervisors and building administrators; in these domains, more professional development is needed.
  - Assignment of co-teaching arrangements is determined by building administrators

Based on classroom visits conducted by PCG, co-teaching exists throughout PPS but its structure looks very different based on the classroom one is visiting.

The classroom visits included several clearly co-taught classrooms, reflecting a traditional general education / special education co-teaching team. The observations showed a mix of well-implemented co-taught classrooms and those that were primarily one teach, one assist model. However the well design co-taught classrooms appeared to reflect collaborative practices aligned with known standard practices in co-teaching.

In the middle and high schools, PCG saw more examples of the general education as the instructional leader, providing the lesson; whereas the special education teacher was the "helper teacher," supporting all students but with a specific focus on their caseload. At the elementary schools where co-teaching exists, teachers were instructing lessons together. However, there were still examples of the special education teacher playing the "helper teacher".

As stated earlier, because ICR is only offered in required courses, there are opportunities within PPS where co-teaching could possibly occur, but it is not. For example, it was shared through parent focus groups there may be college prep or advanced classes that would benefit from a co-teacher; however, at the high school that does not occur. It is important to note, we may not have seen this because our visits occurred during a highly unusual school year, in the midst of the COVID-19 Pandemic. District administration noted that placement decisions, including ICR for an advanced course, is a decision of the IEP team.

Universal Design for Learning

Universal Design for Learning (UDL) provides an approach based on neuroscience and cognitive science and a framework for front- loading instructional design to reach a wider range of learners, including students with IEPs.[58] UDL provides a common, district-wide foundational set of practices that align with the districts' beliefs and vision and mission statements about the role of the teacher, how students learn best, and the purpose of education. UDL provides all educators a common set of understandings and language and practices for designing and implementing instruction that engages learners and proactively anticipates and responds to diversity in learners. Furthermore, UDL helps educators think strategically about their current practices and provides a framework to expand their thinking about planning and varied ways to engage students, present new learning, and facilitate the learning process.

UDL is firmly grounded in the belief that every learner is unique and brings different strengths and weaknesses to the classroom. Traditional curricula are "one-size-fits-all," designed to meet the needs of a "typical" student. As a result, any student that falls outside this narrow category is presented with a host of barriers that impede access, participation, and progress in the general curriculum.[59] UDL
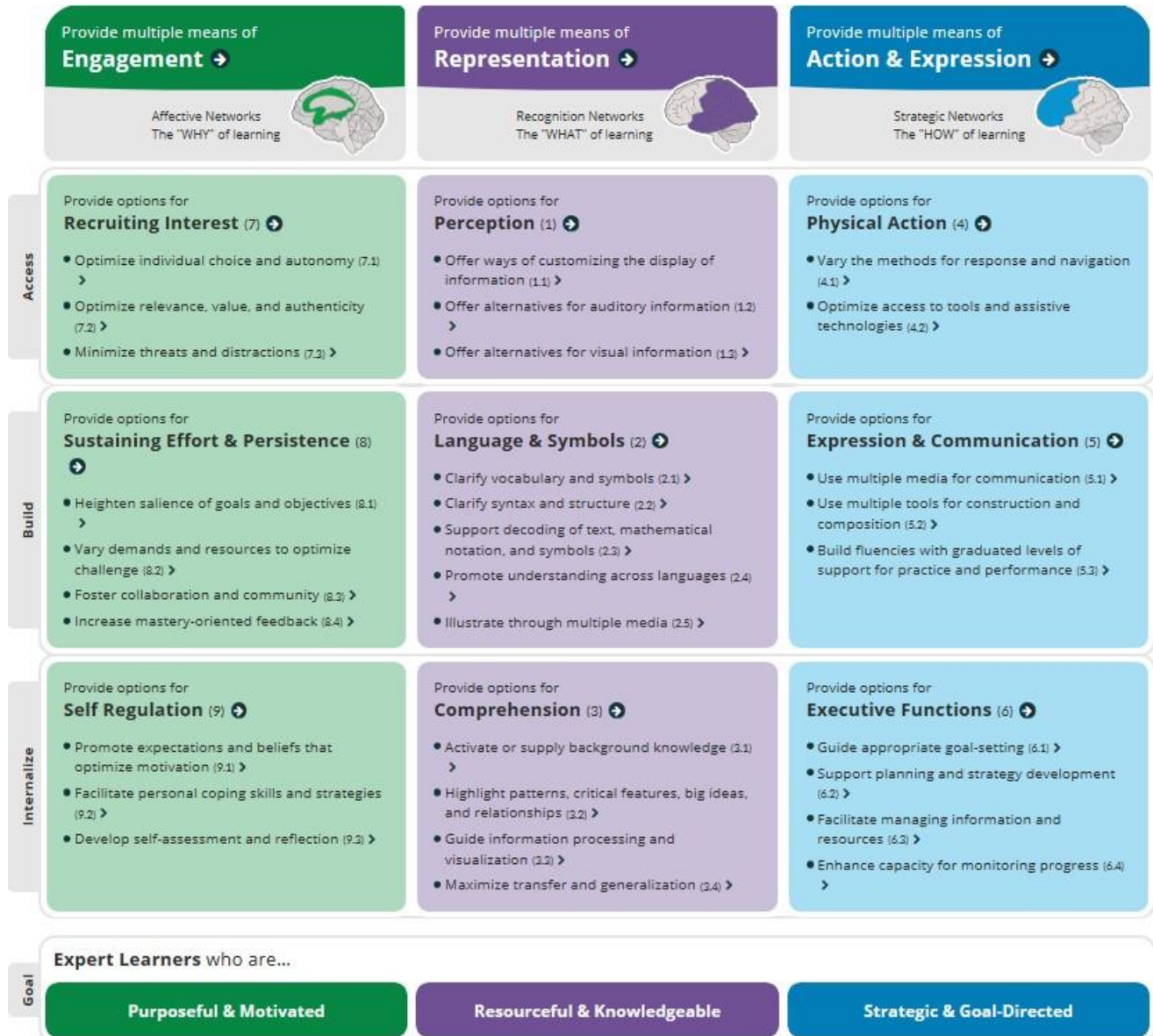
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[58] National Center on UDL. UDL Guidelines- Version 2: Research Evidence.
http://www.udlcenter.org/research/researchevidence
[59] LD OnLine. http://www.ldonline.org/article/13002/

can make instruction more accessible to all students when used in designing the district's curriculum, scope and sequence, pacing, lesson plans, and assessments. There are three main learning guidelines: multiple means of engagement-the why of learning, multiple means of representation-the what of learning, and multiple means of action and expression-the how of learning.

EXHIBIT 25: UNIVERSAL DESIGN FOR LEARNING GUIDELINES, 2018[60]

Provide multiple means of **Engagement →** Affective Networks The "WHY" of learning	Provide multiple means of **Representation →** Recognition Networks The "WHAT" of learning	Provide multiple means of **Action & Expression →** Strategic Networks The "HOW" of learning
Access — Provide options for **Recruiting Interest** (7) → • Optimize individual choice and autonomy (7.1) > • Optimize relevance, value, and authenticity (7.2) > • Minimize threats and distractions (7.3) >	Provide options for **Perception** (1) → • Offer ways of customizing the display of information (1.1) > • Offer alternatives for auditory information (1.2) > • Offer alternatives for visual information (1.3) >	Provide options for **Physical Action** (4) → • Vary the methods for response and navigation (4.1) > • Optimize access to tools and assistive technologies (4.2) >
Build — Provide options for **Sustaining Effort & Persistence** (8) → • Heighten salience of goals and objectives (8.1) > • Vary demands and resources to optimize challenge (8.2) > • Foster collaboration and community (8.3) > • Increase mastery-oriented feedback (8.4) >	Provide options for **Language & Symbols** (2) → • Clarify vocabulary and symbols (2.1) > • Clarify syntax and structure (2.2) > • Support decoding of text, mathematical notation, and symbols (2.3) > • Promote understanding across languages (2.4) > • Illustrate through multiple media (2.5) >	Provide options for **Expression & Communication** (5) → • Use multiple media for communication (5.1) > • Use multiple tools for construction and composition (5.2) > • Build fluencies with graduated levels of support for practice and performance (5.3) >
Internalize — Provide options for **Self Regulation** (9) → • Promote expectations and beliefs that optimize motivation (9.1) > • Facilitate personal coping skills and strategies (9.2) > • Develop self-assessment and reflection (9.3) >	Provide options for **Comprehension** (3) → • Activate or supply background knowledge (3.1) > • Highlight patterns, critical features, big ideas, and relationships (3.2) > • Guide information processing and visualization (3.3) > • Maximize transfer and generalization (3.4) >	Provide options for **Executive Functions** (6) → • Guide appropriate goal-setting (6.1) > • Support planning and strategy development (6.2) > • Facilitate managing information and resources (6.3) > • Enhance capacity for monitoring progress (6.4) >
Goal — Expert Learners who are... **Purposeful & Motivated**	**Resourceful & Knowledgeable**	**Strategic & Goal-Directed**

Universal Design for Instruction and Differentiated Instruction (DI) are approaches to meeting the needs of varied learners and represent an evidence-based practice in General Education. Therefore, they are not considered a special education / specially-design instructional practice. However, the approach of designing instruction and the instructional environment to meet the needs of a majority of students in a class, enable students with IEPs to more easily progress in a general educational setting. In addition, the deliberate use of differentiating what is taught, how it is taught and how

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[60] CAST (2018). Universal Design for Learning Guidelines version 2.2. Retrieved from http://udlguidelines.cast.org

learning is assessed according to students' readiness, learning profile, interests, creates a more personalized or tailored approach to learning and yields progress.[61]   UDL and DI are considered critical to apply in the inclusive classroom setting.

PPS has placed little professional emphasis on Universal Design for Learning. UDL has not been a priority of the Office of Curriculum and Instruction.

According to special education administration, the district has embraced principles of UDL.   In particular, faculty and administration "…may not use UDL terminology but there are pieces within the curriculum writing template that address accommodations, differentiation, providing access for students with different learning needs – it could probably be a stronger emphasis."

Based on classroom visits conducted by PCG, although the data suggests that there are elements of UDL there was very little evidence that instruction was planned with multiple means of engagement, instruction or individual student assessment. To further support this claim, there were very few students using Assistive Technology for support in executive functioning, reading, writing and mathematics. The use of Assistive Technology is often an indicator that there is consideration has been given to a student for accessing to the general education curriculum and participating equally in class with their peers without IEPs.

Some of the teachers reported in pre/post examples of the use of differentiation of instruction. It was difficult to discern to what extent DI is used and under what protocols, or circumstances. Those classroom visits in which DI was not observed nor discussed during pre/post, it appears that differentiation was either not considered or a judgement was made it wasn't needed.

Assistive Technology

In IDEA 2004, assistive technology was defined as: "any item, piece of equipment or product system, whether acquired commercially off the shelf, modified, or customized, that is used to increase, maintain, or improve the functional capabilities of children with disabilities" (20 U.S.C. 1401(1)). In addition, IDEA defines an assistive technology service as "any service that directly assists a child with a disability in the selection, acquisition, and use of an assistive technology device. The term includes-

- The evaluation of the needs of a child with a disability, including a functional evaluation of the child in the child's customary environment;
- Purchasing, leasing, or otherwise providing for the acquisition of assistive technology devices by children with disabilities;
- Selecting, designing, fitting, customizing, adapting, applying, retaining, repairing, or replacing assistive technology devices;
- Coordinating and using other therapies, interventions, or services with assistive technology devices, such as those associated with existing education and rehabilitation plans and programs;
- Training or technical assistance for a child with a disability or, if appropriate, that child's family; and
- Training or technical assistance for professionals (including individuals or rehabilitation services), employers, or other individuals who provide services to employ, or are otherwise substantially involved in the major life functions of children with disabilities."[62]

Based on information gathered from interviews and focus groups, the use of assistive technology seems to be isolated to applications for students with low incidence disabilities. No interviews yielded an impression that there is a formal and systematic assessment process or the use of assistive

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[61] Tomlinson, C.A. (2017).   How to Differentiate Instruction in Academically Diverse Classrooms, 3rd Edition
[62] 20 U.S.C. 1401(2)

technology for students with learning and executive functioning difficulties. Most interviewees focused on instructional technology and the district's capacity to infuse technology within the learning environment. According to district administration, for the past several years we have contracted with a private firm for assistive technology support. At the start of the pandemic, however, that firm went out of business. The district's assistive technology consultant through that organization started their own business and the district now contracts with that individual. According to the district, the assistive technology consultant provides consultation, evaluations and training to staff and students. She also works with parents through interviewing, problem solving and training – especially now that we are in a virtual world. In addition, PPS' Technology Office provides support for devices.

PCG saw limited uses of assistive technology during classroom visits. It is important to note, PCG's classroom visits during the COVID-19 Pandemic may have been a reason for this.

Use of Para-educators

In New Jersey, a paraprofessional is considered a non-certified instructional staff person who does not hold the position of teacher but assists in the classroom under the guidance of a teacher. This has been articulated since the No Child Left Behind Act of 2001 and has remained the same since the 2017 reauthorization of ESSA. Locally, sometimes paraprofessionals are called teacher aides or instructional aides.[63] When it comes to supporting the needs of students with disabilities, paraprofessionals may provide supplementary support to a student or students in areas including, but not limited to:

- Prompting, cueing, redirecting student participation;
- Reinforcing of personal, social, behavioral, and academic learning goals;
- Organizing and managing materials and activities; and
- Implementing teacher-directed follow-up and practice activities.[64]

Paraprofessionals play an important role in providing some students with disabilities access to the Least Restrictive Environment. This is especially true for the following needs, all of which were reiterated by PPS administrators, staff, and paraprofessionals as activities that are occurring in the district:

1. Student needs assistance in self-care (e.g. toileting, feeding, dressing, mobility).
2. Student needs intensive assistance in the area of communication support.
3. Student behavior poses a significant disruption in the classroom.
4. Student behavior poses a direct discernible safety risk to him/herself or others.
5. Student needs intensive, ongoing support in vital areas (e.g. academics, functional skills, re-direction to benefit from instruction).[65]

Decision-making Around Paraprofessionals

According to Professor Michael Giangreco of the University of Vermont, a leading scholar on the provision of paraprofessional supports in public schools, "If schools respond exclusively to the request for a paraprofessional without fully understanding the meaning behind the request, it

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[63] NJDOE Highly Qualified Staff, https://www.state.nj.us/education/title1/hqs/pp/ppfaq.shtml
[64] Effective IEP Decision-making, NJDOE, 2015-16.
https://www.nj.gov/education/specialed/idea/lre/year1trainings/7/IEPDevDecisionmaking.pdf and N.J.A.C. 6A:14-4.5(b)
[65] NJDOE ESSA Requirements for Title I Paraprofessionals can be accessed at:
https://www.state.nj.us/education/title1/hqs/pp/ppfaq.shtml

increases the likelihood of masking the underlying issues and delaying attention to them."[66] Instead, he says, "the task is to identify the underlying issues so that they can be addressed."[67]

Potential Inadvertent and Detrimental Effects Associated with Excessive Proximity

Giangreco and Hoza have identified eleven potentially inadvertent and detrimental effects associated with excessive paraprofessional proximity.[68]

According to survey results:

- Over 63% of special education teachers agree or strongly agree that paraprofessionals at their school(s) are used effectively to support the needs of students with IEPs; however, over 33% of special education disagreed or strongly disagreed with that statement.

According to special education administration:

- Adding support in the classroom; wide range; if the student needs notes; we may have a classroom para to take notes; it depends on the need – there is a number of interventions that could be put in place.
- There have been some inconsistencies on the support of behavior and so para-educator training has taken place.

Based on classroom visits, PCG saw paraprofessionals supporting 1:1. However, because our visits were virtual, and the instructional circumstances were not typical, there were likely many examples of how paraprofessionals support students that were missed.

Overall, several administrators shared concern about an over-dependence on paraprofessionals with CSTs having limited tools at their disposal to support paraprofessional fading when a student having a paraprofessional is no longer necessary.

Based on our file review, PPS uses a form to support the appropriate decision-making and determination of paraprofessional support in a student's IEP.

Based on interviews and focus groups, specifically file review focus groups, IEP teams are now using a revised document provided by the district to support the appropriate use and determination of need of paraprofessionals.

Access Advanced Courses and Extra Curriculuar Activities

It is recognized that students with IEPs have a disability that may significantly hinder their ability to benefit from general education. As such, students with IEPs require supports and accommodations to meet high academic standards and to fully demonstrate their conceptual and procedural knowledge and skills in ELA (reading, writing, speaking and listening) and math. These supports and accommodations should ensure that students receive access to multiple means of learning and opportunities to demonstrate knowledge, but retain the rigor and high expectations of the New Jersey Student Learning Standards, and include the following elements:

- Instruction and related services designed to meet the unique needs of these students and to enable them to access to the general education curriculum;

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[66] Giangreco, M.F., Doyle, M.B., Suter, J.C., Constructively Responding to Requests for Paraprofessionals: We Keep Asking the Wrong Questions. Remedial and Special Education 33(6), October 2012, 362-373.
[67] Giangreco, M.F., Halvorsen, A.T., Doyle, M.B., Broer, S.M., Alternatives to Overreliance on Paraprofessionals in Inclusive Schools. Journal of Special Education Leadership 17(2), October 2004, 82-90.
[68] Giangreco, M. F. & Hoza, B. (August 2013). Are paraprofessional supports helpful? Attention, 20(4), 22-25. Full Text: Are paraprofessional supports helpful. Adapted from Giangreco, M. F., Yuan, S., McKenzie, B., Cameron, P., & Fialka, J. (2005). "Be careful what you wish for…": Five reasons to be concerned about the assignment of individual paraprofessionals. Teaching Exceptional Children, 37(5), 28-34

- Teachers and specialized instructional support personnel who are prepared and qualified to deliver high-quality, evidence-based, individualized instruction and support services;

- Instructional supports for learning that are based on the principles of Universal Design for Learning (UDL)

- Instructional accommodations that reflect changes in materials (e.g., assistive technology) or procedures that do not change the standards but allow students to learn within the NJSLS framework.

It must also be made clear that these supports and accommodations are intended for all courses offered in a school district, and do not preclude accelerated courses. According to a Dear Colleague Letter by the US Department of Education, as part of a child's Free and Appropriate Education under IDEA, "…if a qualified student with a disability requires related aids and services to participate in a regular education class or program, then a school cannot deny that student the needed related aids and services in an accelerated class or program."[69]

During focus groups and interviews, PPS parents expressed concerns about access to advanced courses, AP, and extracurricular activities for students with IEPs.

According to special education administration, supporting students with disabilities s in arts and AP/advanced classes been an issue over the years. The cause, according to administration, is that PPS is a smaller district and not able to run multiple sessions of a class (e.g. AP, Music/Arts). Administration notes that the high school population has grown and, subsequently, this has become less of an issue. Nevertheless, elective scheduling at the high school level is driven by student interest. This can cause scheduling conflicts for students with IEPs who have specific and time limited special education services.

During interviews and focus groups, some parents raised concerns about access to performing arts due to the need to "try out"; in particular, parents raise this as an equity issue.

Administration noted that some of the primary challenges in the scheduling of AP/ Extra Curricular activities for students with IEPs include: providing aide support for electives; challenges of AP classes and advanced classes with co-teaching due to limited staffing. At the middle school level, administration shared the most significant barrier can be the master schedule – the elective desired occurs at the same time as a special education service.

During interviews and focus groups, board members and parents expressed past frustrations over access to AP, advanced courses, Music, and Arts. Although some students shared frustration during the focus group about scheduling challenges between special education services and electives, they shared they did not feel excluded. Interviews with building leadership shared that a concerted effort has been made to make sure that students with disabilities have access to these courses.

PCG visited and elective class and found the lesson to be well planned, the students to be supported, and the teacher made efforts to differentiate instruction in a class that did not have a co-teacher or paraprofessional.

EARLY CHILDHOOD SUPPORTS AND SERVICES

Most 3- to 5-year-olds with disabilities learn best when they attend preschools alongside their age-mates without disabilities to the greatest extent possible. These settings provide both language and behavioral models that assist in children's development and help all children learn to be productively engaged with diverse peers. Studies have shown that when children with disabilities are included in the regular classroom setting, they demonstrate higher levels of social play, are more likely to initiate

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[69] Dear Colleague Letter: Access by Students with Disabilities to Accelerated Programs, December 26, 2007, https://www2.ed.gov/about/offices/list/ocr/letters/colleague-20071226.html.

activities, and show substantial gains in key skills—cognitive skills, motor skills, and self-help skills.[70] Participating in activities with typically developing peers allows children with disabilities to learn through modeling, and this learning helps them prepare for the real world. Researchers have found that typically developing children in inclusive classrooms are better able to accept differences and are more likely to see their classmates achieving despite their disabilities. They are also more aware of the needs of others. The importance of inclusive education is underscored by a federal requirement, which requires that the extent to which young children (three to five years of age) receive the majority of their services in regular early childhood programs, i.e., inclusively or in separate settings, be included as a state performance-plan indicator.

The district recently began using the Creative Curriculum for preschool. PCG remotely visited some of the district's preschool classrooms and some preschool teachers participated in district interviews and focus groups. PPS administration shared that there is adherence to the Creative Curriculum in the preschool.

TRANSITION GOALS

In New Jersey, IEP teams begin creating Transition goals, as required by IDEA, at age 14. According to the New Jersey Department of Education: "Transition is a formal process of long-range cooperative planning that will assist students with disabilities to successfully move from school into the adult world. High quality transition planning and services will enable students with disabilities to pursue their desired postsecondary goals. The following resources are intended to assist schools, families, students, and others in understanding what to do for successful transition to happen, and how to do it."[71]

According to administration, the following are components of PPS' transition programming:

- Case managers own the process.
- School-to-work program – run by teacher, works with kids in classrooms and organizes community work programs; identifying vocational opportunities.
- Transition programming works in concert with the district's Autism program and Bridges program – specific to students with mental health issues.

In the special education survey that was administered by PCG, parents of children ages 14 and over were asked a series of questions specific to their child's Transition experience. Of most concern in these responses were the number of responses in which parents disagreed, strongly disagreed, or did not know.

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[70] Book Chapter: How Do Children Benefit from Inclusion?. http://archive.brookespublishing.com/documents/gupta-how-children- benefit-from-inclusion.pdf
[71] https://www.nj.gov/education/specialed/transition/

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
The IEP team developed individualized goals related to postsecondary education, employment, independent living, and community participation for my child.	6	14.3%	11	26.2%	12	28.6%	5	11.9%	8	19.0%	42
The IEP team identified transition services (for example community service, independent living skills, etc.) to help my child.	3	7.7%	5	12.8%	13	33.3%	5	12.8%	13	33.3%	39
My child's transition plan is preparing them for life after high school.	4	10.0%	6	15.0%	10	25.0%	4	10.0%	16	40.0%	40

ACHIEVEMENT OF STUDENTS WITH DISABILITIES

This section provides a longitudinal analysis of student outcomes on the New Jersey Student Learning Assessment (NJSLA) in English Language Arts/Literacy (ELA/Literacy) and in mathematics. The exhibits compare the performance of students at PPS with state averages for students with IEPs and those without, documenting the achievement gap over time.[72]

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[72]NJSLA scores obtained from NJ School Performance Report: https://rc.doe.state.nj.us/. PCG looked at the percentage of testers who met/exceeded expectations for students who took the specific grade level learning assessment.

English Language Arts/Literacy

Grade 3. Between 2016-17 to 2018-19, PPS students with IEPs performed well above the state average of students with disabilities. During this time, the percentage of PPS students with IEPs who met or exceeded expectations was 25 perecntage points higher than the state average for students with disabilities. When compared to their non-disabled peers, the percentage of PPS students with IEPs who met or exceeded expectations was, on average, 19 percentage points lower.

EXHIBIT 27: GRADE 3 ELA/LITERACY, 2016-17 TO 2018-19
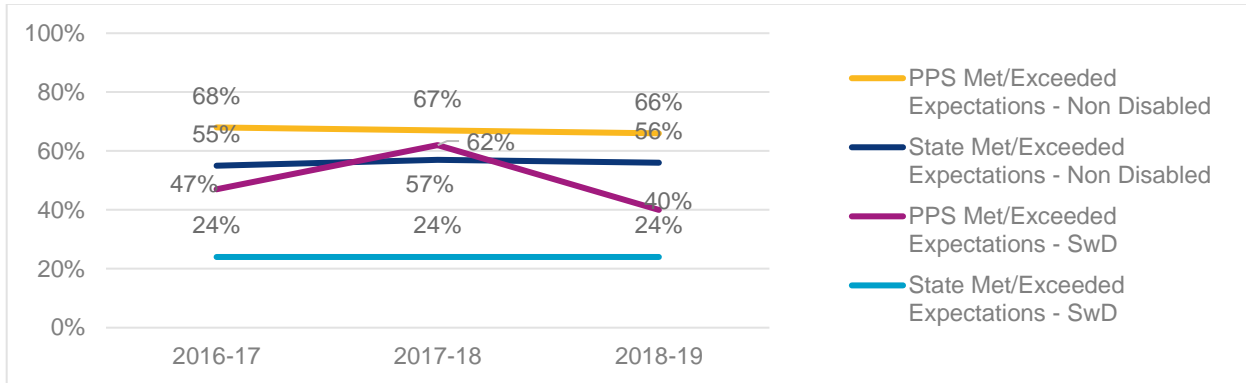
Grade 8. Similar to the Grade 3 trends, the percentage of PPS students with IEPs who met or exceeded expectations on the grade 8 ELA/literacy assessment was above the overall state rate for students with disabilities. However, between 2017-18 to 2018-19 the percentage of students with disabilities who met or exceeded expectations decreased 18 percentage points. When compared to their non-disabled peers, PPS students with IEPs who met or exceed expectations on the grade 8 ELA/literacy assessment was significantly lower. The three-year average achievement gap between PPS students with IEPs and non-disabled students was 40 percentage points.

EXHIBIT 28: GRADE 8 ELA/LITERACY, 2016-17 TO 2018-19
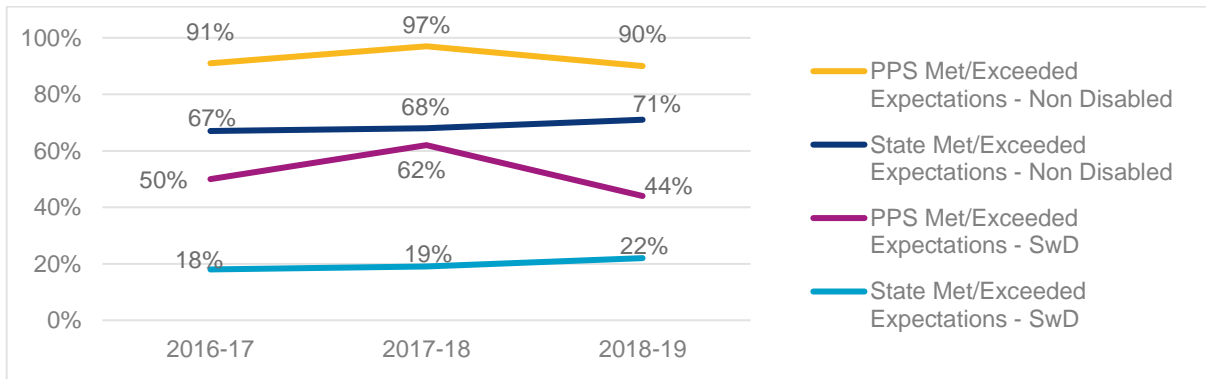
Grade 10. The percentage of PPS students with IEPs who met or exceeded expectations on the grade 10 ELA/Literacy assessment was higher than the state average for all students with disabilities. However, between 2016-17 to 2017-18, the percentage of PPS students with IEPs who met or exceeded expectations decreased 41 percentage points. Similar to other grade levels, when compared to their non-disabled peers, a substantially smaller percentage of students with IEPs met or exceeded expectations on the grade 10 reading assessment. The three-year average achievement gap between PPS students with disabilities and those without disabilities was 42 percentage points.
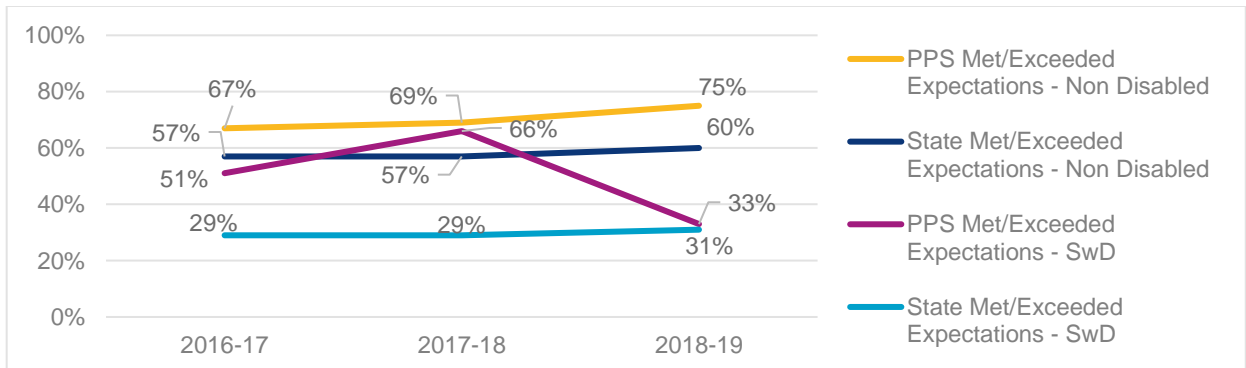
EXHIBIT 29: GRADE 10 ELA/LITERACY, 2016-17 TO 2018-19
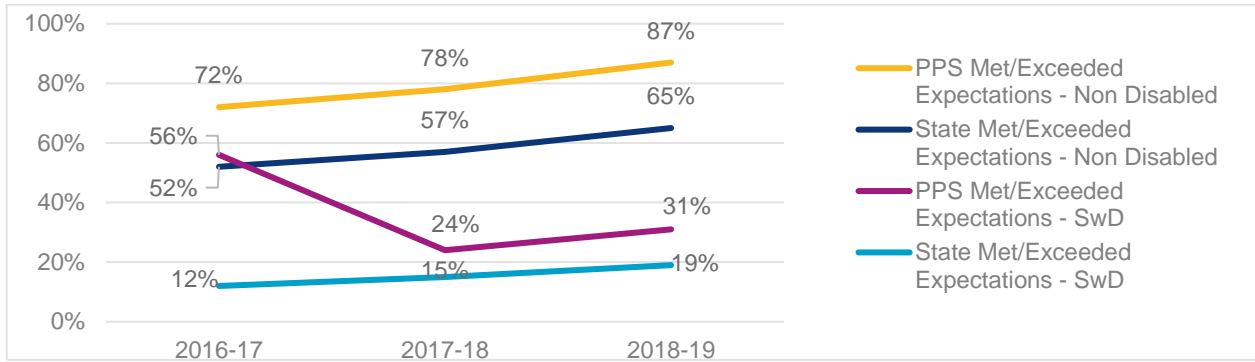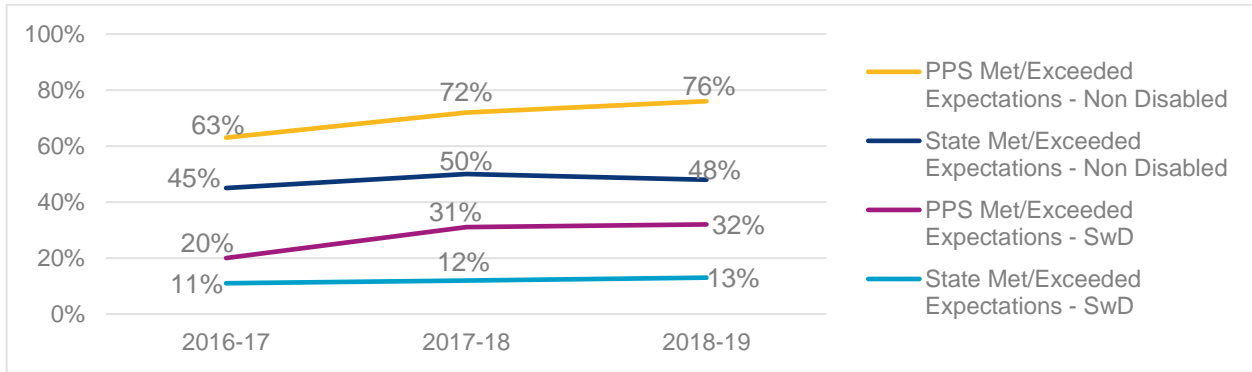

Mathematics

Grade 3. The percentage of PPS students with IEPs who met or exceeded expectations on the grade 3 mathematics assessment was substantially above the state average for students with disabilities. In 2017-18, the percentage of PPS students with IEPs who met or exceeded expectations was higher than the non-disabled state average and was within three percentage points of the average for non-disabled students at PPS. However, between 2017-18 to 2018-19, the percentage of PPS students who met or exceeded expectations decreased 36 percentage points. Compared to their non-disabled peers, a smaller percentage of PPS students with IEPs met or exceeded expectations. The three-year average achievement gap between PPS students with disabilities and those without disabilities was 20 percentage points.

EXHIBIT 30: GRADE 3 MATHEMATICS, 2016-17 TO 2018-19

Grade 7. Between 2016-17 and 2018-19, the percentage of PPS students with IEPs who met or exceeded expectations on the grade 7 mathematics assessment was higher than the state average for students with disabilities, increasing 12 percentage points from 20% to 32%. Compared to their non-disabled peers, the percentage of PPS students with IEPs who met or exceeded expectations was significantly smaller. Between 2016-17 to 2018-19, the overall achievement gap between PPS non-disabled students and students with IEPs was 42 percentage points.

Algebra. Between 2016-17 to 2018-19, the percentage of PPS students with IEPs who met or exceeded expectations on the Algebra I assessment was higher than the state average for students with disabilities, ranging between 22%-23%. A smaller percentage of PPS students with IEPs met or exceeded expectations when compared to their non-disabled peers. The three-year average achievement gap between PPS students with disabilities and those without disabilities was 50 percentage points.

**EXHIBIT 32: ALGEBRA I, 2016-17 TO 2018-19**
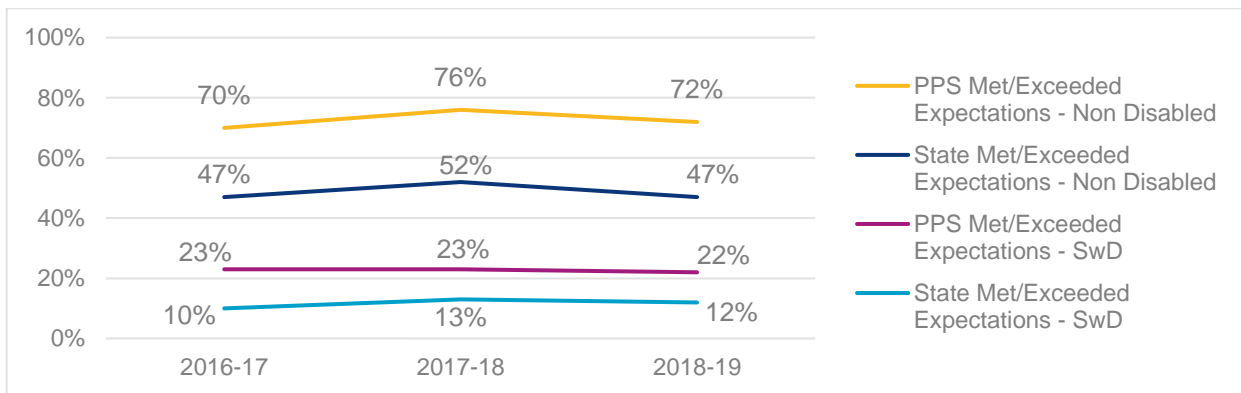
Graduation and Drop Out Rates

Between 2017 to 2020, the percentage of PPS students with IEPs graduating from high school in four years was above the overall statewide graduation rate.[73] Between 2017 and 2018, the percentage of PPS students with an IEP graduating from high school decreased by 9.7 percentage points. When compared to their non-disabled peers, PPS students with IEPs graduated at a lower rate. In 2020, the difference between the percentage of students with disabilities graduating was nine percentage points lower than the districtwide average.

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[73] PPS Graduation and drop out data provided by PPS in 2020. Statewide graduation and drop out data obtained from NJ School Performance Report: https://rc.doe.state.nj.us/.

EXHIBIT 33: PERCENT OF PPS AND STATE STUDENTS WITH AND WITHOUT IEPS GRADUATING FROM HIGH SCHOOL IN 2016-2020
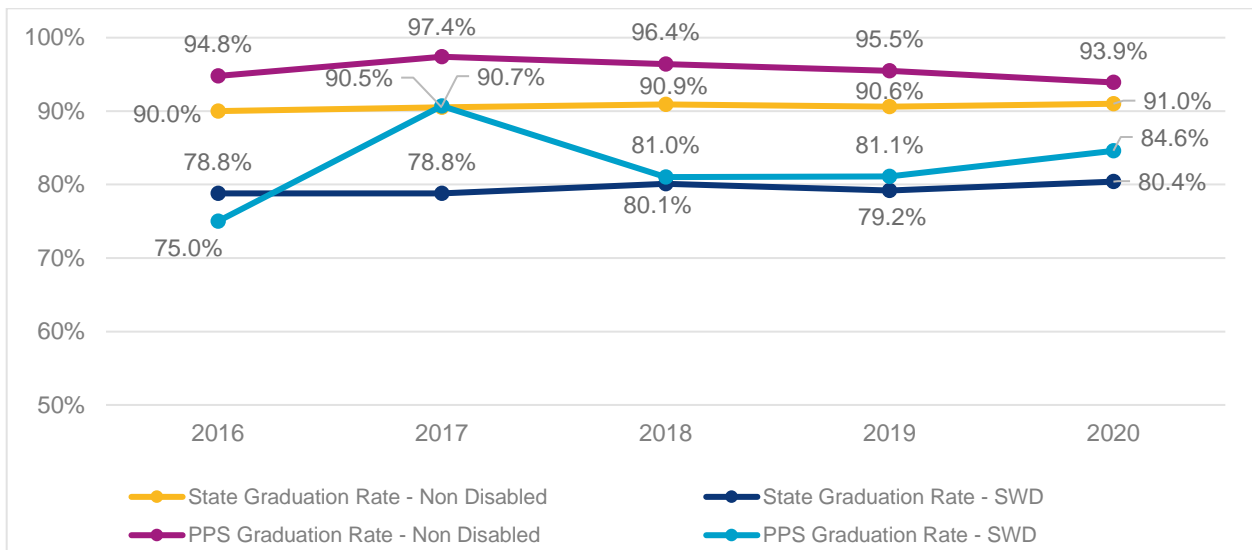
Between 2018 to 2020, the percentage of PPS students with and without IEPs increased. The dropout rate for students with IEPs increased by 2.6 percentage points. Compared to students without IEPs, PPS students with disabilities had dropout rates within one percentage point. In 2020, students a smaller percentage of students with IEP dropped out compared to students without IEPs.

EXHIBIT 34: DROPOUT RATE OF PPS STUDENTS WITH AND WITHOUT IEPS COMPARED TO STATE AVERAGES, 2018-20
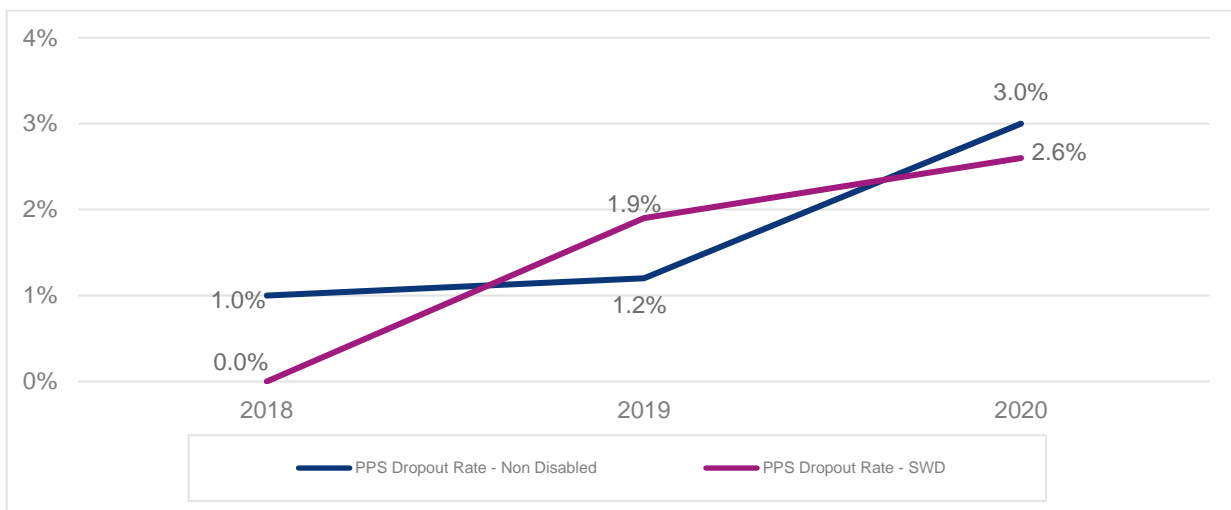
PROFESSIONAL DEVELOPMENT

Quality teaching in all classrooms and skilled leadership in all schools will not occur by accident. It requires the design and implementation of the most powerful forms of professional development. High quality professional development must be sustained, intensive, and classroom-focused (not one-day or short-term workshops or conferences) to have a positive and lasting impact on classroom instruction and teacher's performance. Research reports that elementary school teachers who

received substantial professional development—an average of 49 hours—boosted their students' achievement by about 21 percentile points.[74]

Yet, most professional development today is ineffective. Though districts, including PPS, spend a considerable amount of time and resources on arranging workshops for teachers and other staff, research has shown that programs that are less than 14 hours have no impact on student achievement or on teaching practices. Recent studies have concluded that effective professional development adheres to the following principles:

- The duration of professional development must be significant and ongoing to allow time for teachers to learn a new strategy and grapple with the implementation problem.
- There must be support for a teacher during the implementation stage that addresses the specific challenges of changing classroom practice.
- Teachers' initial exposure to a concept should not be passive, but rather should engage teachers through varied approaches so they can participate actively in making sense of a new practice.
- Modeling has been found to be a highly effective way to introduce a new concept and help teachers understand a new practice.
- The content presented to teachers shouldn't be generic, but instead grounded in the teacher's discipline (for middle school and high school teachers) or grade-level (for elementary school teachers).[75]

In PPS, Professional Development is managed by the Assistant Superintendent for Curriculum and Instruction. Over the past three school years, PPS has offered the following days for PD:

- 2020-2021 – 7 full days and 3 half days
- 2019-2020 – 5 full days and 3 half days
- 2018-2019 – 5 full days and 3 half days

In addition, according to district administration, over the past several years, PPS has developed a PD plan that began over the summer with its "Summer Institute." According to district administration, the summer institute and Flex PD has offered many special education focused professional development sessions over the past several years.

According to district special education administration, over the past few years the district has focused on a new math program and equity. In PPS, PD is provided for instructional aides including targeted PD for aides in self-contained classes. Annually, Handle with Care crisis de-escalation and restraint training is provided for all aides and staff who need such training. The district's teachers, behaviorist and supervisors are also Handle with Care certified trainers.

In addition, according to special education administration, special education teachers who request or need specific training are sent to programs provided by outside providers. For example, the district indicated it has sent teachers to Teacher's College for literacy training and to other PD providers for training specific to their area of need (autism; dyslexia etc.). The district has also sent CST members to PD programs related to their disciplines. Some of the trainings have been focused on trauma informed practices, depression, anxiety, and analysis of test results. The following are samples of some of the sessions they have attended:

- Equity in Education

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[74] Reviewing the evidence on how teacher professional development affects student achievement. Issues & Answers. REL 2007- No. 033. Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance, Southwest Regional Educational Laboratory, October 2007. Findings based on nine studies that meet What Works Clearinghouse standards.

[75] Id.

- Beyond Decoding – meeting the needs of all learners with dyslexia
- Neurocognitive processing and interventions for students with ADHD and SLD
- Autism NJ Conference
- Learning consultants conference – Assessment, interventions and transition
- Social Emotional Learning through equity lens
- Self-regulation interventions to reduce frustration
- Trauma informed compassionate classrooms

IV. SOCIAL EMOTIONAL SUPPORT FOR STUDENTS WITH DISABILITIES

Strengths	Opportunities
• PPS' behaviorist plays an active role in the Functional Behavior Assessments Behavioral Interventions of students with disabilities	• PPS does not have a formalized tiered behavioral support structure for students with disabilities

SPECIALIZED BEHAVIOR SUPPORT FOR STUDENTS WITH DISABILITIES

With the passage of the Individuals with Disabilities in Education Act (IDEA) and its amendments, Congress recognized schools must be inclusive of all students and use evidence-based approaches to support the behavioral needs of students with disabilities. According to the US Department of Education, Office of Special Education Technical Assistance Center on Positive Behavioral Interventions and supports, PBIS is the only approach specifically mentioned in the law for preventing exclusion, improving educational outcomes, and addressing the behavior support needs of students with disabilities. In addition to PBIS, the law states education for students with disabilities can be more effective when schools[76]:

- Provide incentives for whole-school approaches.
- Implement scientifically-based early reading programs.
- Use early intervention services to stop labeling students as 'disabled' in order to address their learning and behavioral needs[77]

Tiered Positive Behavior Support Model for Students with Disabilities

Children and youth with disabilities benefit from free, appropriate, public education designed to meet their unique needs. At the same time, we serve students with disabilities best when we integrate their general and specialized supports into the larger school-wide framework.

Tier 1: Students with disabilities benefit from Tier 1 supports by including the school-wide language for expectations in their individualized education plan (IEP) and goals. Adopting these expectations and applying them during specialized instruction is important, too. School personnel teach students behavioral expectations using the core PBIS lessons and use the school-wide acknowledgement system for appropriate behaviors. Within classrooms, children with and without disabilities benefit from lots of opportunities to respond, positive acknowledgements, and reminders like prompts and pre-corrections.

Tier 2: At Tier 2, students receive targeted interventions beyond what are provided at Tier 1 support. Students with disabilities may benefit from Tier 2 supports the same as any other student in the school. One consideration when placing students with disabilities on Tier 2 supports is to ensure the Tier 2 support does not reduce or replace services outlined in the student's IEP.

Tier 3: Tier 3 supports a few students who engage in chronic, severe behaviors and who haven't responded to Tier 1 and Tier 2 supports. Part of the Tier 3 framework includes designing Behavior Intervention Plans (BIP) with interventions driven by Functional Behavioral Assessments (FBA).

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[76] OSEP Technical Assistance Center on Positive Behavioral Interventions and Supports (2021). Positive Behavioral Interventions & Supports <https://www.pbis.org/topics/disability>
[77] Id.

Teams may apply a person-centered or wraparound process. These processes place student and family needs at the center of the support provided for students with complex needs. Students with disabilities access Tier 3 interventions in two ways: (1) As part of typical school practices or (2) as required through the IEP.[78]

According to data gathered from interviews and focus groups with administrators as well as information gathered during file review focus groups, a Behavior Support group runs each year where teachers, behaviorist and CST work together to problem solve behavioral issues that are not resolved through standard means. This group tends to be attended by the Autism teachers, aides, CST members and other self-contained program teachers who need assistance from peers. However, the district does not subscribe to a formalized, three-tier approach to supporting the behavioral needs of students with IEPs.

- Over 67% of special education teachers and over 70% of general education teachers disagreed or strongly disagreed that general education teachers are provided adequate training in effectively supporting the needs of students with IEPs.
- Over 50% of special education teachers and 59% of general education teachers disagree or strongly disagree that there is a is a well-articulated approach in my school(s) to address the behavior needs of students with disabilities.
- Over 54% of special education teachers agreed or strongly agreed that Students with IEPs have adequate services in place to manage challenging behavior in the classroom. Over 45% of general education teachers disagree or strongly disagree with that statement and over 21% of general education teachers responded that they did not know.

PROTOCOLS FOR CONDUCTING AND IMPLEMENTING FUNCTIONAL BEHAVIOR ASSESSMENTS AND BEHAVIORAL INTERVENTION PLANS

If behavior impedes the student's learning or the learning of others, the IEP team must consider, when appropriate, strategies, including positive behavioral interventions and supports to address that behavior. A behavior intervention plan (BIP) must be included in the IEP when the CST determines that it is needed. The necessity of a BIP is determined through the administration of a Functional Behavior Assessment (FBA). The following are items typically included in a BIP:

- Target behavior(s);
- Documentation of prior interventions and student response;
- Description of the positive supports/interventions, including the conditions under which the supports/interventions will be implemented;
- Procedures for data collection to evaluate the effectiveness of the interventions;
- Conditions under which the supports/interventions are changed;
- Conditions under which the supports/interventions will be terminated; and
- Parental involvement.

According to district administration, the behaviorist generally plays a role in the creation of a Behavior Intervention Plan. In addition, the IEP case management system's BIP form is credited for maintaining districtwide consistency.

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[78] Id.

V.   ORGANIZATION AND LEADERSHIP

Strengths	Opportunities
• Incoming leadership (Superintendent and permanent Assistant Superintendent for Curriculum and Instruction) have an important responsibility to direct and re-calibrate general education initiatives that have a significant impact on special education referrals	• Lack of clarity on ownership of MTSS, I&RS, PBIS at Central Office Level. • No formal special education standard operating practices. • Lack of clear delineation of hierarchy of responsibilities causing oversight challenges in ensuring that general and special education teachers engage in IEP process in a timely manner.

ORGANIZATIONAL STRUCTURE
EXHIBIT 35: PPS SPECIAL EDUCATION ORGANIZATIONAL CHART ADOPTED 1/3/19
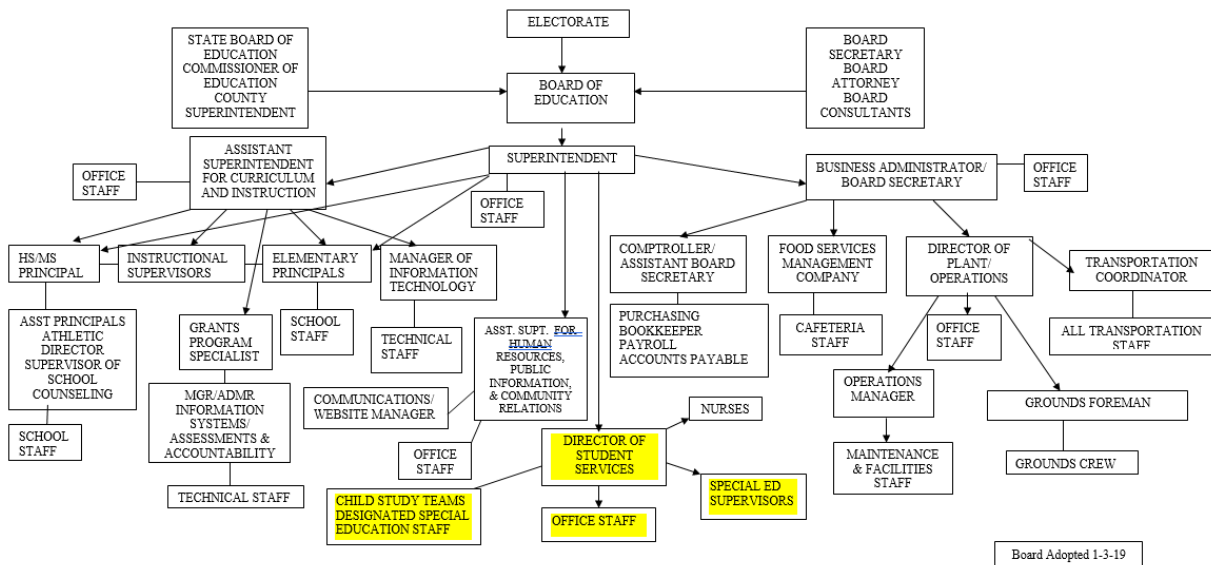
CENTRAL OFFICE LEADERSHIP: VISION, MISSION, AND GOALS

As stated earlier, there have been many changes happening at the PPS Central Office since the start of this review. In PCG's interview with the former, retired Superintendent of Schools, he spoke to the following accomplishments and opportunities for growth:

- **Accomplishments**
  - Proud of autism program
    - Grown over the years, started at elementary and has grown into middle and high school
  - Has brought students back to district
    - Added MD program
  - Finding place for students with significant disabilities in the district

- o Our kids are really accepting of students with learning differences and significant needs in academic and nonacademic settings

- o Shifting of teaching and instruction to less of a lecture style

- o Special education teachers becoming partners to general education teachers in instructional design

- o Looking for teachers with special education background and experience with differentiating instruction

- o Differentiation was thought of as accommodation and modification; culture shifting to understanding that it is changing how we teach

- **Opportunities for growth**

  - o Acceptance of students with disabilities at the high school level

  - o Participation of students with disabilities in higher level courses

    - ▪ No gatekeeping for access but do not know the level of support they are getting in these classes

  - o Shift to strength-based/asset-based model of looking at all students

  - o Continuing to get students involved in their own goal-setting

  - o Disproportionality – African American students who are classified

    - ▪ Preschool expansion

    - ▪ Achievement gap comes before they come to us in kindergarten

      - • "We have 10 book children and 10,000 book children"

      - • Students are coming in at very different levels so teachers are spending a lot of time buttressing up students with lower background knowledge

        - o This is truer for our students of color – economic disadvantage and implicit biases

      - • Greater percentage of Free and Reduced Lunch eligible students are getting access to pre-k

    - ▪ Training for teachers on implicit bias and racial literacy

    - ▪ Having conversations on race and culture and their impact on student achievement

ADMINISTRATIVE STRUCTURE SUPPORTING THE DELIVERY OF SPECIAL EDUCATION SERVICES

The PPS Special Education Department Consists of the following:

- 1 Director of Special Education
- 1 Supervisor of PreK-2nd grade
- 1 Supervisor of 3rd-8th grade
- 1 Supervisor of 9th-Post Graduate

As required by the New Jersey state regulations, Child Study Teams (CSTs) have broad responsibility, consisting of the identification, evaluation, determination of eligibility, development and review of the individualized education program, and placement. CST Teams play an important role in compliance and creation of high-quality special education documents. CSTs consist of three educational professionals: psychologist, a social worker, and a learning disabilities teacher consultant (LDTC). In PPS, there are six Child Study Teams: (1) Community Park School; (2) Riverside School;

(3) Johnson Park School; (4) Princeton Unified Middle School; (5) Littlebrook School; (6) Princeton High School.

Child Study Team members, Special Education Supervisors, and related service providers are directly supervised by the Director of Student Services. All special education teachers are supervised by the special education supervisors building principals. The Director of Student Services plays a role in the evaluation of special education teachers. However, the Director of Student Services does not have day-to-day responsibility of special education teachers. Although the Director Student Services can inform building principals of special education teacher noncompliance or general education teacher non-compliance as it relates to supporting students with IEPs, they cannot hold them accountable.

The chain of command has been a difficult one to navigate on matters related to the IEP. Both special education and general education teachers have been known to not submit IEP data in a timely manner (or, sometimes, at all). The child's Case Manager will report it to the Supervisor, and the Supervisor will report it to the Director of Student Services; however, the Director cannot hold these staff accountable on a matter the Director is responsible for – the implementation and oversight of IEPs.

SPECIAL EDUCATION DEPARTMENT STANDARD OPERATING PROCEDURES

In PCG's experience, highly effective special education departments have a standard operating procedure manual. This manual typically is inclusive of Board approved policies as well as state and federal code and it offers the step-by-step "how to" on policies and procedures that impact special education. It is intended as a resource for district staff, administration, and community stakeholders. It can serve as a resource for decisions relating to a child's special education program, including but not limited to identification; subsequent evaluation(s); classification; development and review of a child's IEP; educational placement of a child; annual IEP Meetings; triennial reevaluations; accommodations protocols; and assistive technology procurement and service delivery protocols. It should provide clear definitions about district practices. In addition, it should be highly accessible, online and in a format that is easy to navigate.

PPS does not have a special education standard operating procedures manual. According to district administration, it follows New Jersey Code on special education implementation. In addition, the Director of Special Education meets with the special education supervisors monthly. The Director also reviews the IEPs of non-tenured special education case managers and provides ongoing IEP-writing coaching.

COMMUNICATION

Communication between teachers, their supervisors, and administrators are key success factors to support effective programming. According to interviews and focus groups, the communication patterns of administration to supervisors; supervisors to CSTs case managers; and down to teachers. District administration shared they believe communications have enhanced over the past five years. However, building administrators and teachers shared a strong desire to have more face time with Supervisors and CST members.

Over 43% of special education teachers disagreed or strongly disagreed that "there is effective and consistent communication between my building(s) and the central special education office". Over 33% of special education teachers indicated they did not know.

OWNERSHIP OF PROGRAMMING THAT IMPACTS SPECIAL EDUCATION

As stated throughout this report, there has been a lack of clarity and accountability around I&RS, MTSS (or RTI), and positive behavioral supports. All of these are special education initiatives typically under the purview of the Assistant Superintendent of Curriculum and Instruction. In the past five years, based on data gathered from interviews and focus groups, the oversight and accountability

has not been clearly defined. Therefore, at the building level, these initiatives are not being conducted with fidelity

VI. PARENT ENGAGEMENT

Strengths	Opportunities
• PPS has an engaged parent community; surveys indicate parents are satisfied with many aspects of their child's special education programming	• PPS parents views around building culture, expectations, and instruction were validated by many PCG observations; an opportunity exists to work with parents in remedying these issues

SPECIAL EDUCATION PARENT ENGAGEMENT

Having a functioning Special Education Parent Advisory Council (SEPAC) is one essential ingredient to engage the families of students with disabilities. It is also required by law. According to N.J.A.C. 6A:14-1.2(h), each district board of education must ensure that a special education parent advisory group is in place in the district to provide input to the District on issues concerning students with disabilities.

The New Jersey Department of Education, in partnership with the New Jersey Statewide Parent Advisory Network (SPAN), recently developed an online and printed manual on the creation, purpose, mission, and activities of a SEPAC.

Based on data gathered interviews and focus groups with the Director of Special Education and Supervisors of Special Education, parent engagement is viewed as effective, efficient, and robust. In addition, they shared that it has improved over the past few years. Furthermore, it was noted that there are a variety of avenues of communication and suggested that there is easy and ample access to case managers. They also shared that parents are informed, knowledgeable, and are unafraid to speak-up to advocate for their children.

According to district administration, parent training has been a collaborative effort between Special Ed PTO. Trainings have been a mix of outside presenters and district staff who have provided sessions on topics such as Executive Function, mental health, technology, positive education, transition, supports services at the college level, and Autism.

District administration shared: "CST members work hard to engage parents in their child's meeting and will support their participation through any means including phone and video conferencing (even before the pandemic). They call, email and use parent liaisons if needed to contact and communicate with families. The district uses district staff and contracted providers for translation. All CST's know that even if a parent has some English, if they struggle at all, they need to arrange a translator."

According to teacher survey data:

- 70% of special education teachers agree or strongly agree that they have been provided adequate training in communicating with parents of students with disabilities. 70% of general education teachers disagreed with that statement.
- Over 43% of special education teachers disagreed or strongly disagreed that Parents have been provided adequate training to support students with IEPs at home. 30% of special education teachers responded that they did not know.

According to parent survey data responses:

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
Teachers/school staff communicate effectively with me.	36	29.0%	65	52.4%	16	12.9%	4	3.2%	3	2.4%	124
Central administration staff communicate effectively with me.	30	24.8%	45	37.2%	26	21.5%	11	9.1%	9	7.4%	121
School staff respond to my concerns within a reasonable time period.	44	36.7%	61	50.8%	11	9.2%	0	%	4	3.3%	120

During parent focus groups, the following information was shared.

Areas of special education working well, shared by parents:

- "I have rarely heard that when I ask for a service, families get it; there is not a huge fight for requested; there is a broad set of service they provide."

- "Once you have established a relationship with the CST, they are very flexible."

- "The Pre-K program is quite exceptional; many services, the transition between the pre-K to K was exceptional."

- "The student services team, board and super are very open to partner."

- "Transition from Pre-K to K was very well done; the individual special education teachers were outstanding; on the individuals classroom level the teachers are exceptional; our teachers are phenomenal."

- "I agree individually we have come across many great educators; more great than less; there are some rock stars teachers that everyone wants."

- "The Board and key district leaders are willing to understand."

- "The nature and quality of the services especially in speech pathology; quality and frequency of services are very well done."

Special Education areas to improve:

- "There have been a lot of bumps; and there are a lot of inconsistencies; so, parents who do not have the strengths or ability to fight do not get the same services."

- "Low expectations; I am constantly having to push for higher expectations; content and pace; entrenched in a fixed mindset; inclusion and "true" inclusion; we don't put together the special and general education – so inclusion is really bad."

- "We have silo – special education – general education – systemic."

- "Low shared accountability from special education and general education but somehow the share responsibility is lost; some of this may be cultural; and there seems to be a system that allows the separation of gen and sped."

- "Life long track the child from PreK to High School; Did all those investments turn into something for that child."

- "I don't want to hear the teacher that says "I didn't sign up to be a sped teacher."

- "Need to do a better job of instructing parents on processes."

- "The bar was set extremely low; and nothing is transparent; if you ask the right question on the right day then. . . we needed to get an advocate."

- "Are they developmentally ready? "

- "Limited AP classes you can take [when you are a student with a disability] . . . so this is an example of the low expectations."

- "This school district struggles with strengths-based approaches."

- "Ingrained problem; fixed mind-set."

- "Many gen ed teachers do not want to teach kids with learning challenges"

- "A lot of inconsistencies; and low expectations"

VII. BUDGET AND FINANCE

Strengths	Opportunities
• **According to district-provided data, PPS has kept special education instruction costs stable.**	• Thoroughly review the special education budget to assure that the public is seeing accurate data on the *New Jersey User Friendly Budgets* specifically related to special education expenditures.

COSTS AND COMPARISON TO PEER DISTRICTS AND STATE

New Jersey User Friendly Budget

In reviewing how a district leverages its financial resources on special education and comparing the reviewed district to New Jersey peers, PCG refers to the *New Jersey User Friendly Budgets*. According to the New Jersey Department of Education: "In order to provide increased public accountability and transparency, N.J.S.A. 18A:22-8 requires officials in each school district to place a user-friendly summary of their proposed budget on the district's website (if one exists). N.J.A.C. 6A:23A-8.1(c) requires the user-friendly budget summary to be posted on the district's website within 48 hours after the public hearing on the budget. After the election (and following municipal review if the budget is defeated), a final user-friendly summary of the final budget must be posted on both the district's website (pursuant to N.J.S.A. 18A:22-8a) and the Department of Education's website."[79]

Within this review, PCG uses *New Jersey User Friendly Budgets* for comparison purposes; should concerns emerge when reviewing these data, the district should pose additional questions to its Business Administrator and or a Certified Professional Accountant.

The New Jersey User Friendly Budgets provide a count of "students on roll" among other groups of students, including out of district placement students. For purposes of this analysis, because the Special Ed Instruction; Child Study Team expenditures; and OT, PT, Related Services are all for students within the schools, PCG used the "students on roll" count. In addition, for this analysis, PCG used actual 10/15/2019 Student Counts and 6/30/30 audited numbers, all of which are included in the New Jersey User Friendly Budgets.

PPS' Special Education Expenditures

PCG worked with PPS to identify five peer districts on the following like characteristics: (1) student population; (2) socioeconomic status; (3) population; (4) salaries. The selected districts are:

- Chathams, NJ
- Hopewell Valley, NJ
- Millburn, NJ
- Summit, NJ
- Westfield, NJ

In PPS, the special education budget is managed by the Business Administrator. The Special Education Director works with Business Administrator to discuss annual budgeting and expenditures within the department; however, the Special Education Director is not responsible for publicly reporting the budget to the Board of Education or State of New Jersey for the *User Friendly Budgets*. According to district administration, the numbers PPS has been submitting to New Jersey for its *User Friendly Budgets* are incorrect. PPS provided corrected numbers which are included in this report.

[79] https://www.nj.gov/education/finance/fp/ufb/

For purposes of the analyses in Exhibits 37-41, PCG is conducting analyses based on <u>both</u> *New Jersey User Friendly Budgets* and what was corrected by PPS for this report, connoted in yellow. PCG is looking at this on a cost per student basis, specifically using student with disability (SWD) numbers from the *New Jersey User Friendly Budgets*.

EXHIBIT 37: 2019-20 PEER DISTRICTS, EXPENDITURES ON SPECIAL EDUCATION, CHILD STUDY TEAMS, AND RELATED SERVICES, NEW JERSEY USER FRIENDLY BUDGETS AND REPORTED DATA BY PPS

	On Roll Total Students (full time, shared time, and received)	SWDs on Roll (full time and shared time)	OT, PT, Related Services Expenditure	Child Study Teams Expenditure	Special Ed Instruction Expenditure
Chathams	4125	603	$872,610	$1,861,630	$5,926,430
Hopewell Valley	3453	578	$1,285,425	$1,987,438	$7,189,262
Millburn	4674	559	$1,599,123	$2,800,522	$6,597,091
Princeton (User Friendly Budget Data)	4623	554	$1,237,889	$3,555,863	$7,999,040
Princeton (District Provided Data)	4623	554	$2,104.424	$2,384,413	$8,089,491
Summit	3981	410	$874,430	$1,320,606	$7,656,664
Westfield	6226	1018	$3,073,484	$2,277,280	$8,638,083

When reviewing special education instruction costs per student with disability on roll using data reported in the *New Jersey User Friendly Budgets*, PPS is second to Summit in its special education instruction costs. The same is true when looking at corrected PPS numbers.

EXHIBIT 38: 2019-20, PEER DISTRICTS, SPECIAL EDUCATION INSTRUCTION COST PER STUDENT (SWD ON ROLL)
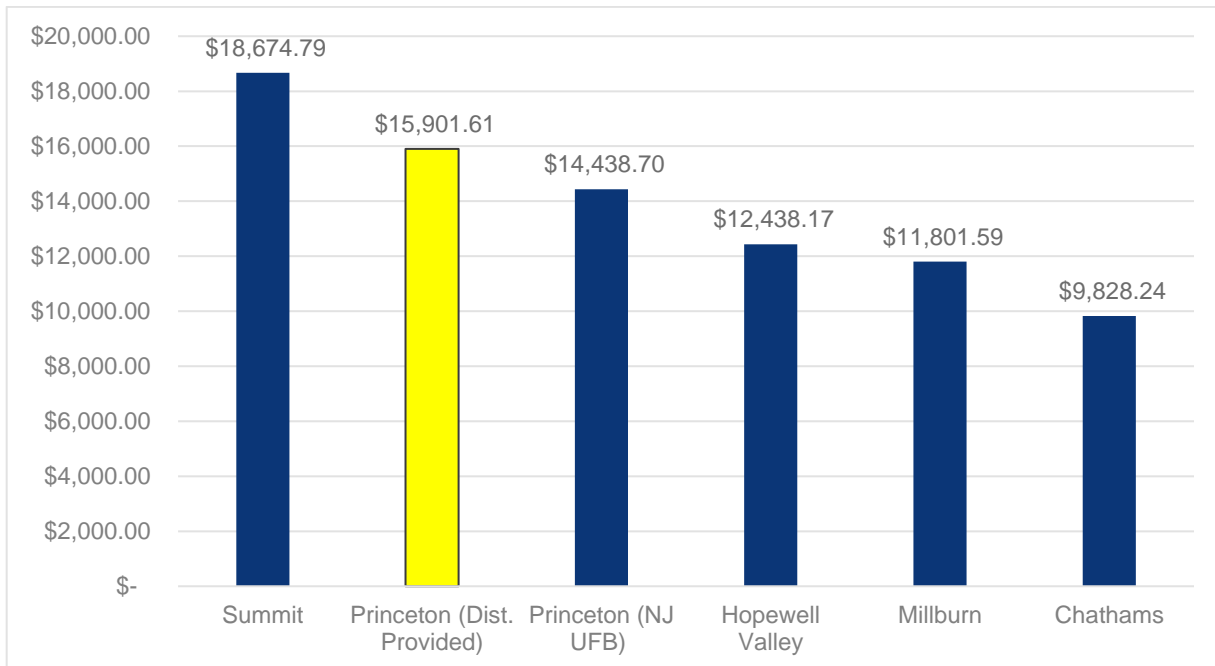
When reviewing OT, PT, and related service costs per student with disability on roll using data reported in the *New Jersey User Friendly Budgets*, PPS' expenditure is in the middle among the peer

districts reviewed. However, when conducting this analysis using corrected data provided by PPS, it is the highest.

EXHIBIT 39: 2019-20, PEER DISTRICTS, OT, PT, AND RELATED SERVICE COST PER STUDENT (SWD ON ROLL)
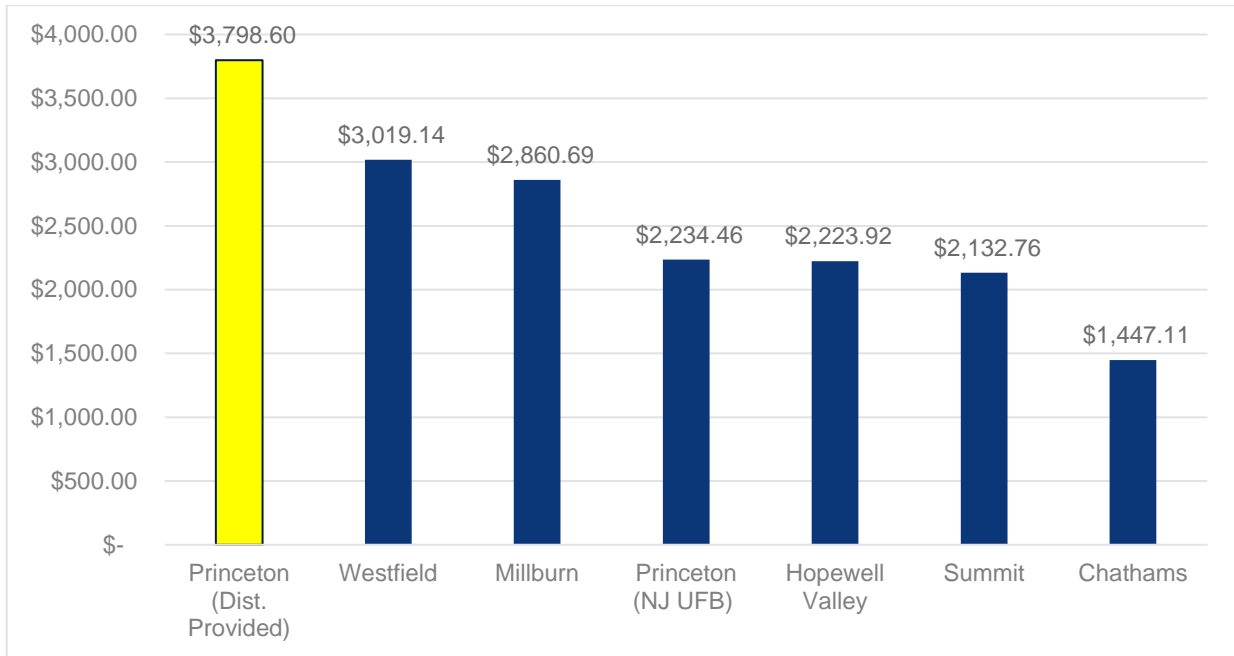
When reviewing child study team cost per student with a disability on a roll using data from the New Jersey User Friendly Budgets, PPS' expenditure is the highest among peer districts. However, when conducting this analysis using corrected data provided by PPS, it is the second highest to Millburn.

EXHIBIT 40: 2019-20, PEER DISTRICTS, CHILD STUDY TEAM COST PER STUDENT (SWD ON ROLL)
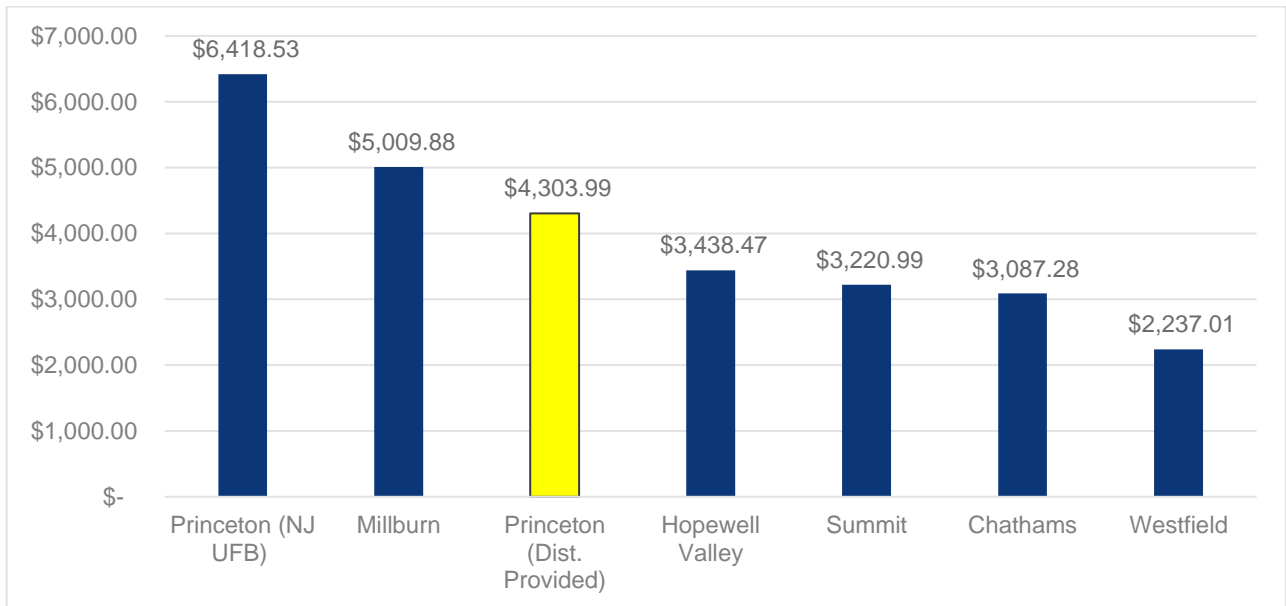
Cost Drivers Based on Data from PPS

As evidenced from the key expenditure data provided by PPS, the most recent significant cost drivers are around related services. Otherwise, special education spending has been relatively stable

EXHIBIT 41: KEY EXPENDITURES USING CORRECTED DATA FROM PPS

	2020	2019	2018	2017	2020%	2019%	2018%
Special Education Instruction[80]	7,999,040	7,922,354	7,639,665	6,921,125	0.97%	3.70%	10.38%
Related Services	2,104,424	1,242,635	1,193,062	1,148,749	69.35%	4.16%	3.86%
Extraordinary Services	90,451	106,145	104,708	103,086	-14.79%	1.37%	1.57%
Child Study Team	2,384,413	3,770,053	3,588,413	3,194,750	-36.75%	5.06%	12.32%
Special Education Transportation	712,087	888,160	899,086	882,510	-19.82%	-1.22%	1.88%

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[80] Instruction costs in this table do not account for an additional $90,451 that was added by the district in the other sections for corrected special education costs.

VIII. SPECIAL EDUCATION COMPLIANCE WITH STATE AND FEDERAL REGULATIONS

Strengths	Opportunities
• Aside from Indicator 3, in areas where PPS does not meet state targets, it is often close to the state target.	• PPS is not meeting any of the Indicator 3 Performance metrics; however, its proficiency rate in HS Math is 16%

STATE PERFORMANCE PLAN AND ANNUAL PERFORMANCE REPORT

The United States Department of Education (USED), Office of Special Education Programs (OSEP) has established SPP/APR requirements that include 17 indicators.[81] These indicators are categorized as either Compliance Indicators or Performance Indicators. In recent years, through RDA, USED OSEP has increased the emphasis of the Performance Indicators. While compliance indicators remain important, under RDA, OSEP has sharpened its focus on what happens in the classroom to promote educational benefits and improve outcomes and results for students with disabilities. This change is based on data showing that the educational outcomes of America's children and youth with disabilities have not improved as expected, despite significant federal efforts to close achievement gaps.

The accountability system that existed prior to the new one placed substantial emphasis on procedural compliance, but it often did not consider how requirements affected the learning outcomes of students. Districts need both to raise the level of and access to high levels of rigor, and also to generate a culture of academic optimism.

IDEA Part B Indicators

- Indicator 1: Graduation Rate
- Indicator 2: Dropout Rate
- Indicator 3: Assessment (Participation and Performance)
- Indicator 4: Rates of Suspension
- Indicator 5: Least Restrictive Environment (LRE), Age 6-21
- Indicator 6: Preschool LRE, Age 3-5
- Indicator 7: Preschool Outcomes
- Indicator 8: Parent Involvement
- Indicators 9, 10: Disproportionate Representation Due to Inappropriate Identification
- Indicator 11: Timely Initial Evaluations
- Indicator 12: Early Childhood Transition
- Indicator 13: Secondary Transition
- Indicator 14: Post-School Outcomes
- Indicators 15, 16: Dispute Resolution
- Indicator 17: State Systemic Improvement Plan

Per the definitions provided by OSEP, RDA focuses on Performance Indicators (1-8, 14-16, and 17). Indicators 9-13 are Compliance Indicators. Although compliance remains important, RDA has amplified the meaningfulness of Performance Indicators.

Based on requirements set by OSEP, each state is required to develop annual targets and monitor Local Education Agency (LEA) performance on each special education indicator. The state must report annually to the public on its overall performance and on the performance of each of its LEAs according to the targets in its Annual Report (APR).[82]

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[81] New Jersey's Annual Performance Plan can be accessed online at:
https://osep.grads360.org/#report/apr/2017B/publicView?state=NJ&ispublic=true
[82] Annual reporting on the performance of each New Jersey school districts according to the targets in New Jersey's State Performance Plan can be accessed online at: https://www.nj.gov/education/specialed/info/spp/

Although the New Jersey Department of Education (NJDOE) Office of Special Education Programs (OSEP) reviews all special education indicators, according to the state's SPP/APR, it gives special consideration to indicators 4B, 11, 12, and 13, stating the following:[83]

> The NJDOE monitors all districts each year through NJSMART, New Jersey's student level data system. Findings of noncompliance with Indicators 4B, 11 and 12 and with requirements related to Indicators 4A and 4B are identified through review of data from NJSMART and the Electronic Violence and Vandalism Report. Once districts are identified as noncompliant with Indicators 11 and 12 through written notification, a review of subsequent data or an onsite targeted review is conducted to ensure correction of noncompliance. For Indicators 4A and 4B, a self-review is conducted in districts that demonstrate a significant discrepancy in their rate of suspensions and expulsions over 10 days and/or a significant discrepancy in suspension/expulsion rate by race and ethnicity. Compliance with IDEA requirements related to discipline procedures, and positive behavioral supports, is reviewed.

> For Indicators 4A and 4B, a self-assessment of discipline requirements, including policies, procedures and practices regarding development and implementation of IEPs, the use of positive behavioral interventions and supports and procedural safeguards is conducted by the LEA. Following the self-assessment, a written report of findings is generated. Corrective action activities are included in the report if noncompliance is identified and are based on any identified root causes of the noncompliance. Corrective action activities may include: the revision of procedures, staff training, and activities related to implementation of procedures, and/or oversight of implementation of procedures.

> Findings of noncompliance with Indicator 13 are identified through a targeted desk audit review. Districts and charter schools are selected for the targeted review based on a schedule that ensures that each district and charter school, with students ages 16 and above enrolled will participate once during the SPP period. The selection of districts is aligned with the selection for Indicator 14, so that districts participate in the Indicator 13 targeted review 2 years prior to their participation in the outcome study. The intent is to ensure that appropriate transition planning will lead to better outcomes for the students in each cohort.

In the 2017-18 school year, PPS did **not** meet SPP targets in five of the seventeen indicators.[84] These areas include the following four performance indicators and one compliance indicators:

- Indicator 3: Assessment – Performance Indicator
- Indicator 5: School Age LRE – Performance Indicator
- Indicator 6: Preschool LRE – Performance Indicator
- Indicator 8: Parent Involvement- Performance Indicator
- Indicator 11: Effective General Supervision of Part B/ Child Find

For Indicator 3, PPS is not meeting any of the state performance targets. It is important to note that these state targets are not the same as NJDOE's ESSA targets. Princeton is no exception among its peers, many who are also not meeting state SPP/APR performance targets. However, its high school math proficiency rate of 16% is low.

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[83] Introduction to New Jersey State Performance Plan (SPP)/ Annual Performance Report (APR) FFY 2017: https://osep.grads360.org/#report/apr/2017B/Introduction?state=NJ&ispublic=true
[84] Because of the collection schedule of these data, the most recently available data is from the 2017-18 school year.

EXHIBIT 42: INDICATOR 3

Indicator 3: Assessment - Performance Indicator
Data Source: ESEA Accountability Data

B. Participation rate for children with IEPs in a regular assessment with no accommodations; regular assessment with accommodations; alternate assessment against grade level standards; alternate assessment against alternate achievement standards.

Subject	LEA Data	State Target	Met State Target	Subject	LEA Data	State Target	Met State Target
LAL	92.9%	97.0%	N	Math	92.5%	97.0%	N

C. Proficiency rate for children with IEPs against grade level standards and alternate achievement standards

Subject LAL	LEA Data	LEA Target	Met LEA Target	Subject MATH	LEA Data	LEA Target	Met LEA Target
Grade 3	35.6%	70.4%	N	Grade 3	30.4%	74.6%	N
Grade 4	68.3%	70.4%	N	Grade 4	47.5%	74.6%	N
Grade 5	42.2%	70.4%	N	Grade 5	31.1%	74.6%	N
Grade 6	33.3%	70.4%	N	Grade 6	35.7%	74.6%	N
Grade 7	63%	70.4%	N	Grade 7	33.3%	74.6%	N
Grade 8	45%	70.4%	N	Grade 8	25%	74.6%	N
Grade HS	37.5%	70.4%	N	Grade HS	16.7%	74.6%	N

* Did not meet the state "n" size of 20 for participation and "n" size of 10 for performance at Grade level
** No data reported
*** No eligible students
NA Not applicable as grades are not offered

For Indicator 5, PPS did not meet state targets for the percent of children with IEPs aged 6 through 21 inside the regular class 80% or more of the day. This metric is an important consideration as PPS contuse expanding ICR settings.

EXHIBIT 43: INDICATOR 5

Indicator 5: School Age LRE - Performance Indicator
Data Source: NJSMART (Collection Date: October 15, 2018)

** : Indicates no reported data on October 15th collection
*** : Indicates no reported data on 6-21 age group

Note: The LRE data for public reporting were collected on October 15 2016 and do not include Non-Public School students.

	Local Data	State Target	Met State Target
A. Percent of children with IEPs aged 6 through 21 inside the regular class 80% or more of the day.	50.4%	50.5%	N
B. Percent of children with IEPs aged 6 through 21 inside the regular class less than 40% of the day.	11.3%	15.0%	Y

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C. Percent of children with IEPs aged 6 through 21 served in public or private separate schools, residential placements, or homebound or hospital placements.	5.3%	6.9%	Y

PPS did not meet Indicator 6; however, the district is continuing to support its relatively small number of preschool children through program expansion.

EXHIBIT 44: INDICATOR 6

Indicator 6: Pre-School LRE - Performance Indicator
Data Source: NJSMART (Collection Date: October 15, 2018)

* Indicates no reported data on October 15th collection
NA: Indicates not a pre-school district

Note: The LRE data for public reporting were collected on October 15 2016 and do not include Non-Public School students.

	Local Data	State Target	Met State Target
A. Percent = [(# of children aged 3 through 5 with IEPs attending a regular early childhood program and receiving the majority of special education and related services in the regular early childhood program) divided by the (total # of children aged 3 through 5 with IEPs)] times 100.	26.7%	45.0%	N
B. Percent = [(# of children aged 3 through 5 with IEPs attending a separate special education class, separate school or residential facility) divided by the (total # of children aged 3 through 5 with IEPs)] times 100	73.3%	34.0%	N

PPS did not meet Indicator 11; however, this is not uncommon for a district with transience. PPS has transience due to the number of scholars, professors, and graduate students with children enter and enter the district.

EXHIBIT 45: INDICATOR 11

Indicator 11: Effective General Supervision Part B/Child Find
Data Source: NJSMART (Collected on October 15, 2019 for the period July 1, 2018 to June 30, 2019)

Percent of children who were evaluated within the State established time line of receiving parental consent for initial evaluation or, if the State establishes a timeframe within which the evaluation must be conducted, within that timeframe ** Indicates no reported data on October 15th collection *** 0 students received parental consent to evaluate	Local Data	State Target	Met State Target
	95.7%	100.0%	N

OFFICE OF CIVIL RIGHTS COMPLAINTS

Over the past three years, PPS had one US Department of Education, Office of Civil Rights (OCR) complaint. The complaint was filed in 2018 and OCR determined in 2019 that it was unfounded.

COMPLAINTS TO THE NEW JERSEY DEPARTMENT OF EDUCATION OFFICE OF SPECIAL EDUCATION PROGRAMS

Over the past three years, there have been no special education complaints filed to the Commissioner of Education at the New Jersey Department of Education.

DUE PROCESS

Under IDEA and NJAC 6A:14, when there is conflict about a child's free and appropriate education, offered in the least restrictive environment, children and families are afforded due process rights. When families and school Districts disagree on matters related to special education they may resolve their disputes through a variety of channels, including: (1) voluntary mediation; (2) due process hearing; (3) and IDEA complaint to the NJDOE OSEP. In addition, families and school Districts can resolve matters outside of mediation and due process through legal settlements.

In addition, in New Jersey, parents and districts have access to a new program offered by the Department called Facilitated IEP (FIEP). It has two main purposes: (1) to promote student-centered IEP meetings that are conducted in a respectful and collaborative manner; and (2) to maximize District-level capacity to develop student-centered IEPs and minimize state-level procedural protections and interventions which often result from ineffective IEP meetings. FIEP Is an option for using a third-party facilitator to promote effective communication and assist the IEP team in developing a mutually agreeable IEP. It focuses on the needs of the student, the IEP process, and an agreed upon IEP document. The program is of no cost to participating families or the school district and may be initiated by either party.

Hearings and Settlements in PPS

In 2017-18 there was one due process hearing filed by a parent in which PPS prevailed and one settlement PPS entered into with a family. In 2018-19 there were two separate settlements entered between two separate parties and PPS. In 2019-20, there was one due process hearing filed by a parent in which PPS prevailed; two due process hearings filed by PPS that are awaiting hearing dates; and one settlement entered between a family and PPS. In 2020-21, there were two due process hearings filed by two separate parties, both are awaiting dates.

IX. RECOMMENDATIONS

PRE-REFERRAL, REFERRAL, ELIGIBILITY AND CHILD FIND

Intervention and Referral Services (I&RS)	✓ Develop districtwide standard operating procedures in writing. ✓ Clearly define, from Central Office and downward, who has direct oversight and is accountable for I&RS, acknowledging this is not a special education initiative but has significant ramifications on special education referrals. ✓ Continue I&RS referral data collection for internal review among district and building leadership.
Multi-Tiered System of Support	✓ Develop districtwide standard operating procedures in writing. ✓ Clearly define, from Central Office and downward, who has direct oversight and is accountable for MTSS, acknowledging this is not a special education initiative but has significant ramifications on special education referrals.
Disproportionality	✓ Conduct quarterly internal assessment of district's risk ratio with specific focus on Hispanic students classified with SLD an and Speech; and Black/African American Students who are classified as OHI, SLD, or Speech.
Accelerated Intervention Services (AIS)	✓ Envelop AIS into MTSS, clearly delineating what Tier II and Tier III AIS interventions and supports are. ✓ Clearly define, from Central Office and downward, who has direct oversight and is accountable for AIS, acknowledging this is not a special education initiative but has significant ramifications on special education referrals.
Positive Behavioral Supports	✓ Infuse a Positive Behavior Support system into the district's MTSS.
English Learners with a Suspected Disability	✓ Engage CST in professional development to increase understanding of the impact of 2nd language acquisition on achievement and methods to understand the impact when determining the presence of a disability.
Placement and Continuum of Services	✓ Continue expansion of In Class Resource support districtwide. ✓ Expand ICR into non "required" courses at high school to expand supports for students with IEPs, specifically at the high school.
High Quality IEPs to Support a Student's Individualized Program	✓ Engage case managers in intensive, ongoing training on IEP writing with specific focus on IEP goal writing and SMART goals, and quantitative progress reporting. ✓ Engage in monitoring student accommodations at elementary schools and the middle school similarly to

	✓ system at high school. ✓ Engage case managers in accommodation monitoring process at high school.

TEACHING, LEARNING, AND SPECIAL EDUCATION SUPPORT

Achievement of Students with Disabilities	✓ Further study NJSLA drop in grade 3 mathematics for students with disabilities who were meeting exceeding expectations.
Co-teaching	✓ Middle and high schools need ongoing, job embedded professional development to support robust co-teaching where both teachers are instructional partners. ✓ Provide professional development to principals and assistant principals of middle and high school on how they, as instructional leaders, can enhance the culture and climate of share responsibility and support effective co-teaching. ✓ Add co-planning time to the days of general and special education teachers who co-teach.
Use of Para-educators	✓ Engage CSTs and case managers in determining best practices around data collection to support paraprofessional fading when it is determined appropriate.
Access to Advanced Placement, and Extra Curricular Activities	✓ Ensure that if a qualified student with a disability requires related aids and services to participate in a regular education class or program, as determined by IEP teams, the school supports related aids and services in an accelerated class or program.
Professional Development	✓ Expand job embedded, ongoing coaching and professional development for all teachers and administrators on special education matters on topics that include but are not limited to culture/climate of shared responsibility; co-teaching; and IEP writing. ✓ Expand job embedded, ongoing coaching and professional development on I&RS and MTSS, providing specific focus on administration from Central Office to building administrators.

SOCIAL EMOTIONAL SUPPORT FOR STUDENTS WITH DISABILITIES

Specialized Behavior Support for Students with Disabilities	✓ Formalize a tiered positive behavior support model for students with disabilities, districtwide.

ORGANIZATION AND LEADERSHIP

Addressing Key Challenges that Impact Special Education but Are Outside of Department Purview	✓ Urgently address –at the Superintendent, Assistant Superintendent for Curriculum and Instruction, and principal levels – the cultural and structural barriers to owning, overseeing, and being held accountable for programs that have a direct impact on

	special education on initiatives such as MTSS, I&RS, AIS, Professional Development, Co-Teaching, and Differentiating Instruction; thus ensuring a clear delineation of the hierarchy of responsibilities of these roles.
Accountability for Teachers Who Are Not Compliant with Requests from IEP Teams	✓ Address teacher non-compliance of timely response for information on IEPs; building level leaders (or direct supervisors) should hold teachers accountable for timely responses, submission, and participation.
Special Education Department Standard Operating Procedures	✓ Develop written standard operating procedures for special education department.

PARENT ENGAGEMENT

Parent Issues	✓ PPS parents views around building culture, expectations, and instruction were validated by many PCG observations; an opportunity exists to work with parents in remedying these issues.

BUDGET AND FINANCE

Costs in Comparison to Peer Districts	✓ Ensure all special line-items are accurately reported to the public in the New Jersey User Friendly Budget.

X. APPENDIX

TABLE OF EXHIBITS

DOCUMENTS REQUESTED PPS

Quantitative Data Requested

1. **Student Level Data (2017-18; 2018-19; and 2019-20 Sys)**

   For all students *with and without IEPs*, please complete the student level data template, attached.

2. **Graduation rate** by students: a) without IEPs AND b) by students with IEPs for the last five years.

3. **Drop-out rate** by students: a) without IEPs AND b) by students with IEPs for the last five years.

4. **Exiting Special Education.** For the last three years, provide the number of students by disability area who exited from special education. Of these students, provide the number who transitioned to a Section 504 plan.

5. **Achievement.** For all students with IEPs assessed:

   a. Percentage on state assessments meeting/exceeding proficient standard in reading performance for the last five school years.

   b. Percentage on state assessments meeting/exceeding proficient standard in math performance for the last five school years.

   If assessments changed during this period of time, explain when they changed and any impact on results.

6. **Special/city-wide programs.** Number and location of special programs for students with IEPs: by preschool, by elementary school, by middle schools, and by high school, and for students in high school past 12th grade to complete postsecondary transition activities.

7. **Personnel.** Number of FTE staff (including contractual and staff who may be employed in other departments) in the areas below. Include personnel for charter schools also if the information is available. If not, please specify that the charter school personnel data are not available.
   a. Special education teachers
   b. Paraprofessionals (only for students with IEPs)
   c. Psychologists
   d. Speech/language Pathologists
   e. Social Workers
   f. Nurses
   g. Occupational Therapists
   h. Physical Therapists Qualitative Data Requested and Received

Qualitative Data Requested

1. **Organization.** Provide a detailed copy of the a) district's organization chart and b) the department of special education's organization chart. For the department of special education, also provide a description of and number for each area of personnel.

2. **Choice Programs.** Describe all PPS choice program types (if any), e.g., charters, magnets, selective enrollment. Describe any implications for students with disabilities.

3. **Instruction aligned with core standards & curriculum.** Districtwide initiatives for the provision of instruction to all students based on core curriculum aligned with state standards that includes students with IEPs.

4. **Improvement planning.** Districtwide improvement plans and templates for school-based improvement plans that pertain to all students, including those with IEPs.

5. **Multi-Tiered System of Supports (MTSS).** District implementation of MTSS, including academic and positive behavior intervention and supports. Please provide information on:

   a. Districtwide implementation of MTSS, including academic and positive behavior intervention and supports. Please address: the organizational structure for supporting MTSS, universal screening, progress monitoring, problem-solving, data collection and review, data reports, procedures, and training.

   b. Any written guidance for MTSS.

   c. List of general education interventions available in PPS.

6. **Referrals.** Any initiatives taken during the past several years that relates to ensuring the appropriate referral of students for a special education evaluation and the responsibility of school principals and other school-based staff for overseeing this process.

7. **Students Educated in General Education Classes.** Provide any district guidance regarding the support of students with disabilities while they are educated in general education classes when their achievement levels are below their peers.

8. **Interventions for Students with IEPs.** Describe any district sponsored/funded interventions for students with IEPs for literacy, math, behavior when achievement/behavior is substantially below expectations

9. **Configuration of special education programs.** Describe the configuration of special education programs, including any separate special education class or school, including any district special school, another district's special school, nonpublic schools and residential treatment centers, and any placement criteria. Describe the regular early childhood program and any placement criteria. For each special program, describe the program, and any placement criteria.

10. **Instructional Support.** <u>For early childhood and for school-aged students as appropriate</u>, please briefly describe and/or provide copies of any relevant documents reflecting district initiatives/training regarding the following areas regarding positive educational outcomes, and briefly describe any challenges.

    a. **Students who are English Learners and have an IEP.** To support improved teaching and learning for ELs with IEPs with respect to the above three areas

    b. **Assistive Technology**. To improve access to and usage of assistive technology.

    c. **Post-Secondary Transition.** To support the provision of improved transition activities and services for post-secondary success, including access to community-based work experiences.

11. **Professional development (PD).**

    a. Provide the number of days the district establishes for staff development (school-based and districtwide) and any current policies regarding mandatory nature of any PD for special education.

    b. Briefly describe how PD is provided on a systemic level, and content related to students with IEPs.

    c. Briefly describe what PD is integrated for special educators jointly and in collaboration with general educators or others.

12. **Special education teachers**

    a. **Allocation.** Process for determining the allocation of special educators to schools.

    b. **Evaluation.** Process for evaluating special educator performance.

13. **Related Services**

    a. **Allocation.** Briefly describe method for allocating related services staff (i.e., social workers, psychologists, nurses, speech/language pathologists, and occupational and physical therapists) to schools.

    b. **Monitoring Performance.** Briefly describe/provide samples of any systemic (or other) mechanisms in place for relevant clinicians to monitor the effectiveness of their instruction, e.g., S/L, etc.

    c. **Coordination/Supervision.** Briefly describe how each area of related service providers are supervised.

14. **Paraprofessionals.**

    a. **Types.** If there is more than one position for paraprofessionals/aides, describe the various positions and duties.

    b. **Determination of need.** Any written guidance for IEP teams to determine a student's need for additional adult support, and any form(s) used to document need.

    c. **Allocation.** Process for determining the allocation of paraprofessionals to schools, e.g., by program or IEP need.

    d. **Evaluation.** Process for evaluating paraprofessional performance.

15. **Special education standard operating procedures.** Provide a copy or URL link to written procedures for governing the administration of special education and related services.

16. **State Performance Plan indicators**. Copy of the last three notices from the state regarding the district's state performance plan indicator outcomes, and the district's outcomes for each of the indicators.

17. **State/OCR Compliance**. A summary of any state or Office for Civil Rights findings and required actions from the last school year and the current school year to date.

18. **Due process**. Number of due process requests and any additional data readily available about due process cases, issues, settled, won, compensatory services, attorney fees, etc. for the last school year, and the current school year to date.

19. **Data reports**. Copies of any regular data reports available for special education administrators and local school administrators to help them manage and coordinate services, monitor performance, and ensure compliance for students with disabilities; and for students who are struggling academically and behaviorally.

20. **Fiscal (2016-17; 2017-18; and 2018-19 SY)**

    a. Provide total revenues and expenditures by federal, state, local, and any other sources for the education of all district students and for students with IEPs, including transportation and placement out-of-district.

    b. Provide detailed information regarding high cost areas for special education, including the area of concern, and relevant current and historic fiscal information.

    c. Strategies to address funding and high cost issues, such as strategic advocacy focused on adequate/equitable funding; realigned resources to district priorities to ensure appropriate services and fiscal accountability; effective/efficient programs that transition students from high cost external programs to district services, etc.

    d. Provide total revenue for the last three years for Medicaid based on fee for service and administrative outreach.

    e. Current cost of educating a student with IEP compared to a general education student for 2016-17; 2017-18; 2018-19.

21. **Parents**. Briefly describe ways in which parents are provided with training, supported in meetings to meaningfully participate, etc.

22. **Accountability**. Provide information on the district's system of accountability for student performance that is inclusive of students with IEPs, e.g., school report card, dashboards, etc.

Describe timely progress reporting, data collection, and other accountability measures for students with disabilities.

23. **Collective Bargaining Agreements.** Copies of any collective bargaining agreements as they relate to special education.

24. **Additional Information**. Please provide any additional information regarding district challenges to high quality instruction for students with IEPs that would be helpful to the team.

SPECIAL EDUCATION PARENT SURVEY
Response Statistics

Totals	199	

1.What is your child's primary disability classification?
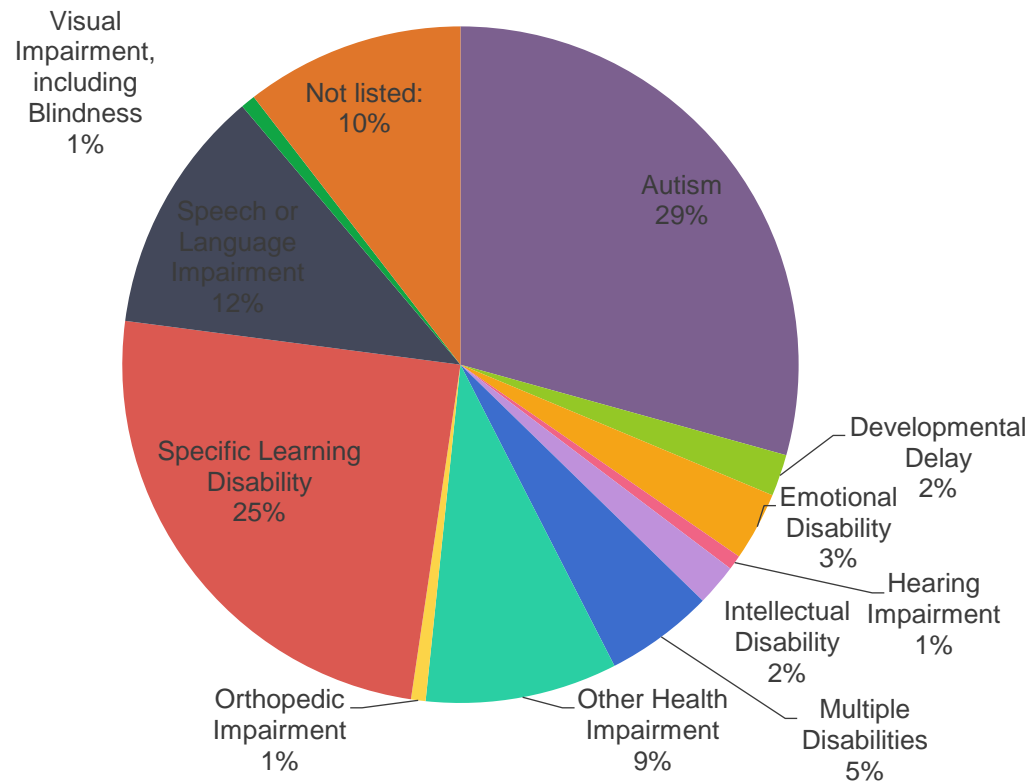
Value	Percent	Count
Autism	29.4%	45
Developmental Delay	*	*

Emotional Disability	*	*
Hearing Impairment	*	*
Intellectual Disability	*	*
Multiple Disabilities	*	*
Other Health Impairment	9.2%	14
Orthopedic Impairment	*	*
Specific Learning Disability	24.8%	38
Speech or Language Impairment	11.8%	18
Visual Impairment, including Blindness	*	*
Not listed:	10.5%	16
	Totals	153

2.What grade is he/she in this school year?
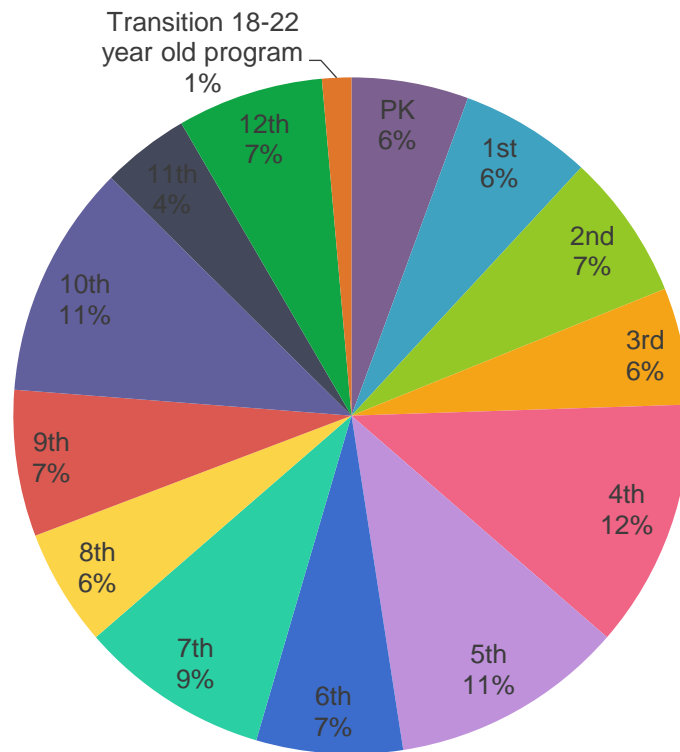
Value	Percent	Count
PK	5.6%	*
1st	6.3%	*

2nd	7.0%	10
3rd	5.6%	*
4th	11.9%	17
5th	11.2%	16
6th	7.0%	10
7th	9.1%	13
8th	5.6%	*
9th	7.0%	10
10th	11.2%	16
11th	4.2%	*
12th	7.0%	10
Transition 18-22 year old program	1.4%	*
	Totals	143

Did your child have a 504 Plan before an IEP?
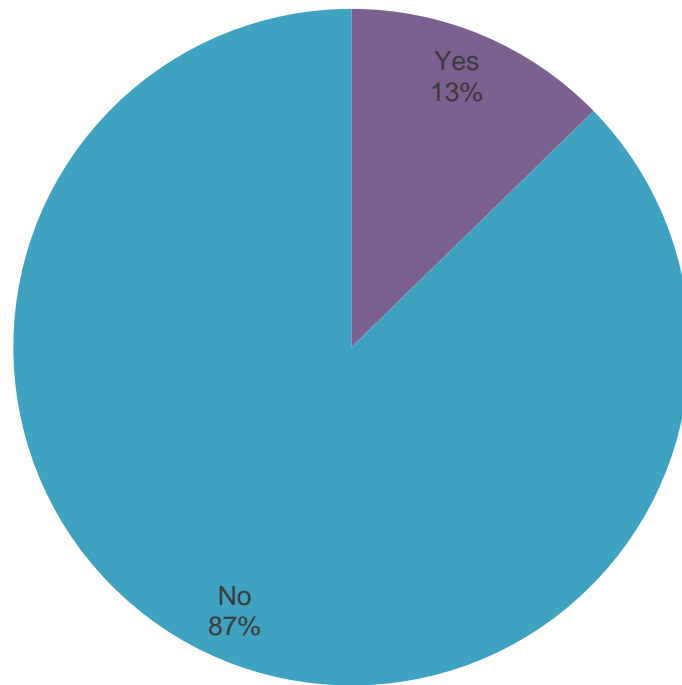
Value	Percent	Count
Yes	12.7%	18

| No | 87.3% | 124 |

Is your child 14 years old or older?
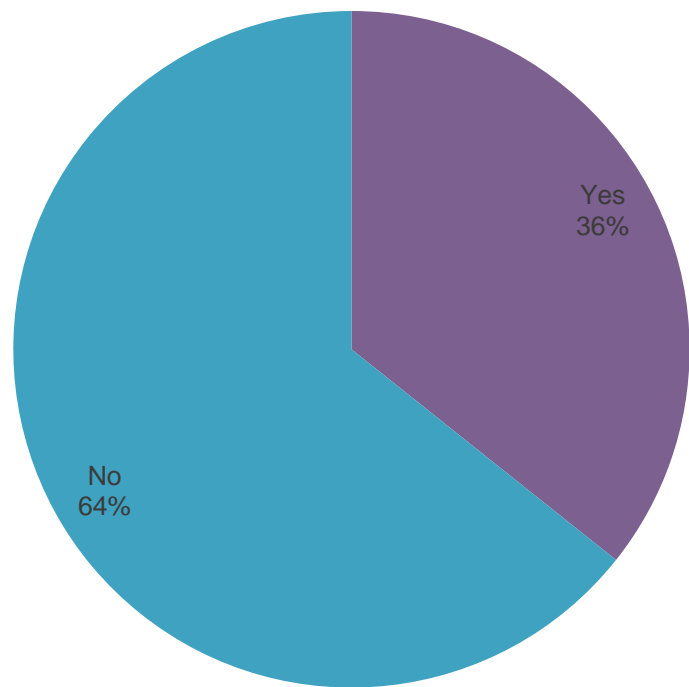
Value	Percent	Count

Yes	35.7%	51
No	64.3%	92
	Totals	143

Before being referred for a special education evaluation, did your child receive supports in Accelerated Intervention Services (AIS)?
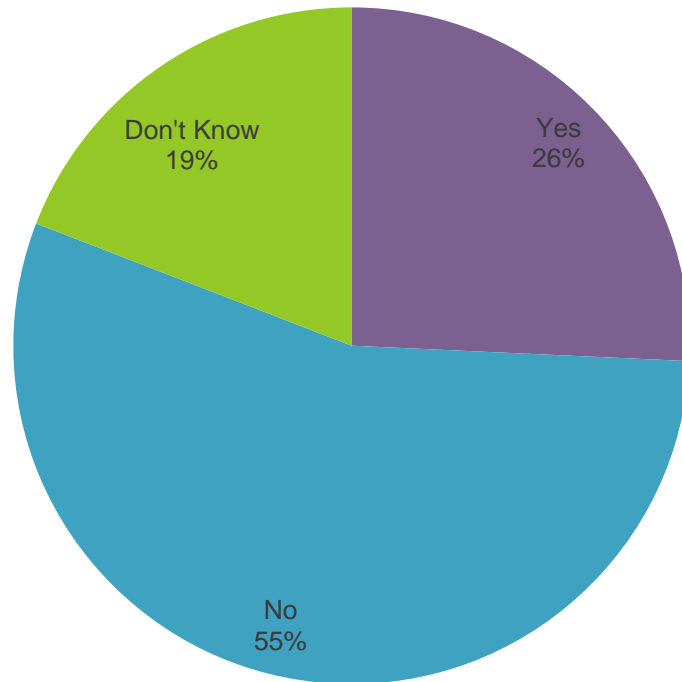
Value	Percent	Count
Yes	25.7%	35
No	55.1%	75

Don't Know	19.1%	26
	Totals	136

Before being referred for a special education evaluation, did your child receive interventions interventions in their general education program and/or supports through their school's Intervention and Referral Services (I&RS) Team?
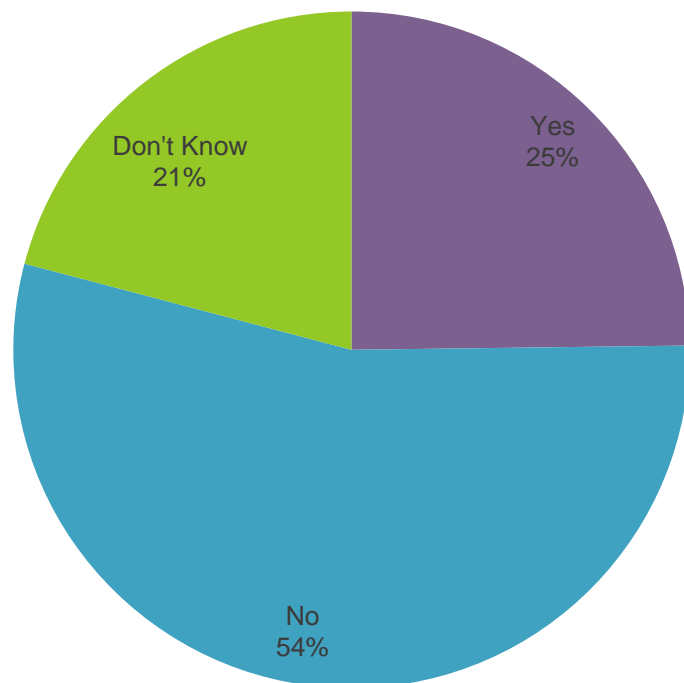
Value	Percent	Count
Yes	24.8%	32

No	54.3%	70
Don't Know	20.9%	27
	Totals	129

My child received interventions through the Response to Intervention (RTI) process (e.g. reading and/or math interventions)
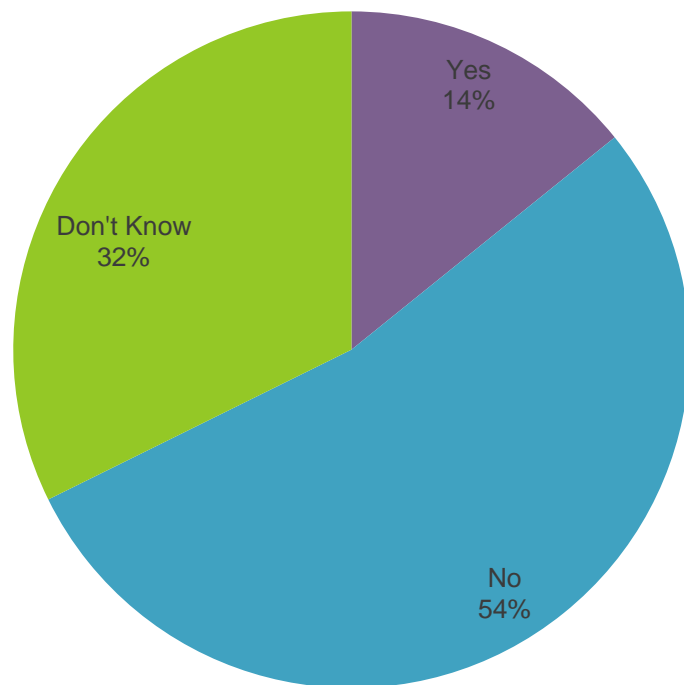
Value	Percent	Count
Yes	14.2%	18
No	53.5%	68

Don't Know	32.3%	41

Who initiated the request for an evaluation for special education for your child?
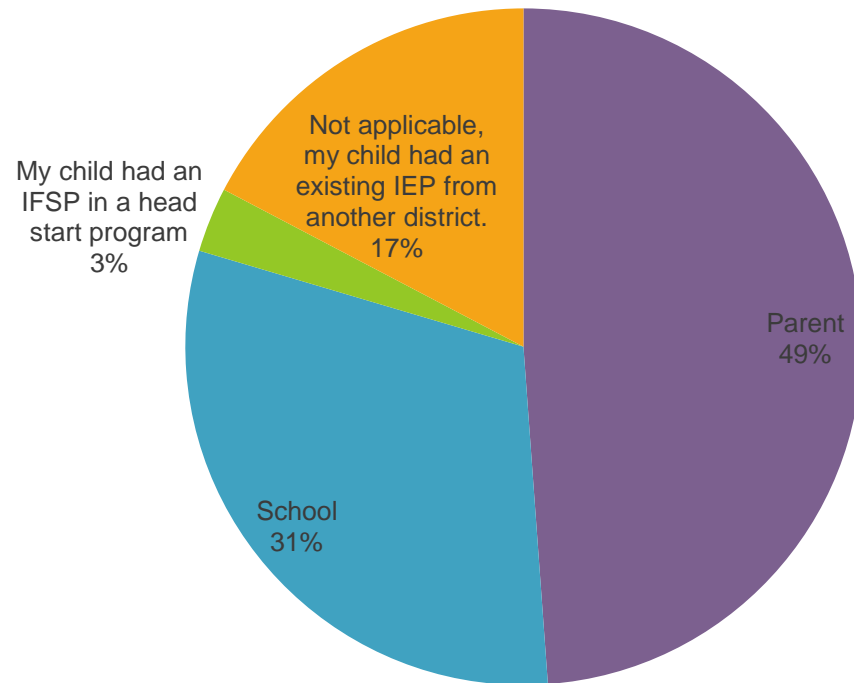
Value	Percent	Count
Parent	48.8%	62
School	30.7%	39

My child had an IFSP in a head start program	3.1%	4
Not applicable, my child had an existing IEP from another district.	17.3%	22
	Totals	127

Do you believe the referral for a special education evaluation was made in a timely manner?
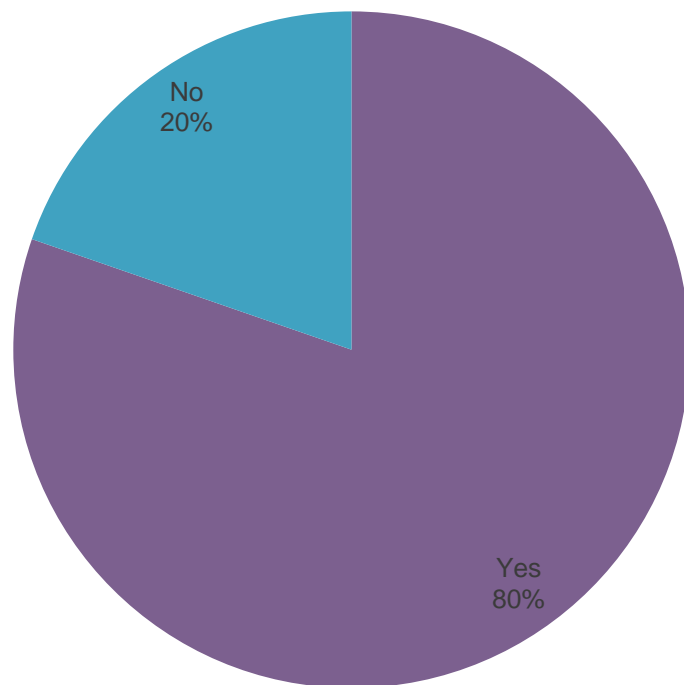
Value	Percent	Count
Yes	80.3%	102
No	19.7%	25

I was provided materials (such as evaluation reports, data for IEP goal development) prior to my child's most recent IEP meeting.
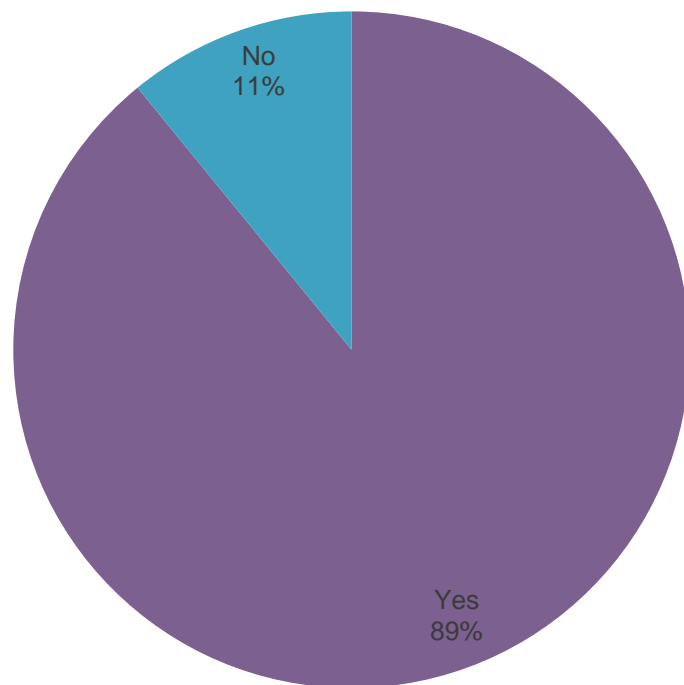
Value	Percent	Count
Yes	89.1%	114
No	10.9%	14

	Totals	128

I was provided adequate time to review these materials prior to my child's IEP meeting.
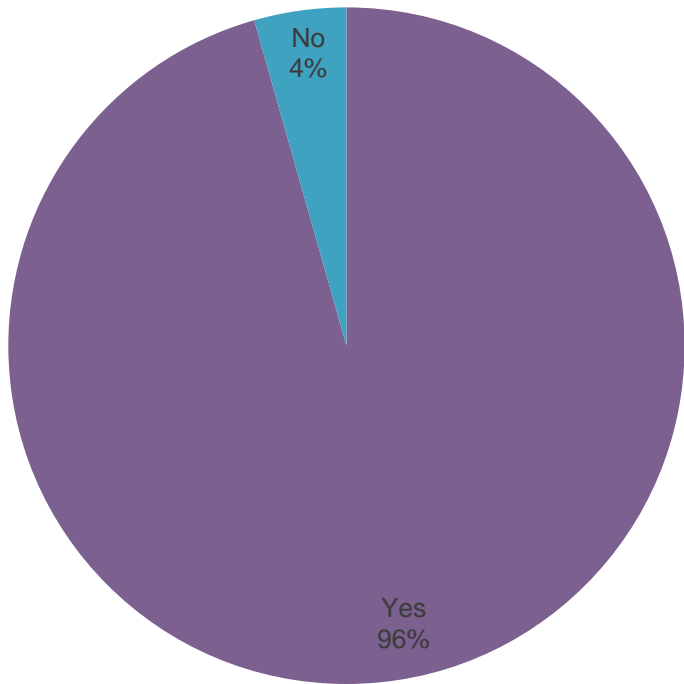
Value	Percent	Count
Yes	95.6%	109
No	4.4%	5

| | Totals | 114 |

Please rate your level of agreement with each of the following statements

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
The school/district fully explained the eligibility/IEP process.	51	39.8%	62	48.4%	6	4.7%	6	4.7%	3	2.3%	128
The initial evaluation(s) conducted by PPS were comprehensive and addressed my child's needs.	51	40.5%	49	38.9%	15	11.9%	7	5.6%	4	3.2%	126

Triennial evaluation(s) conducted by PPS are comprehensive and address my child's needs.
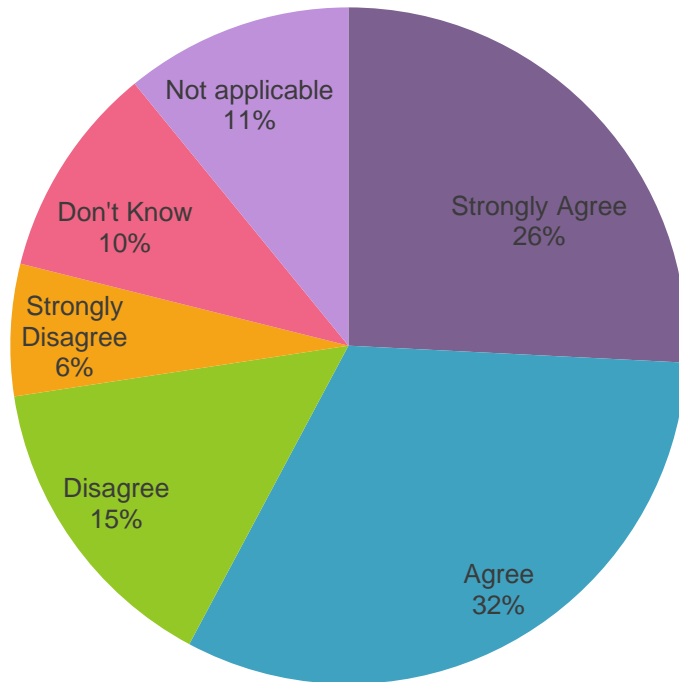
Value	Percent	Count
Strongly Agree	25.8%	33
Agree	32.0%	41

Disagree	14.8%	19
Strongly Disagree	6.3%	8
Don't Know	10.2%	13
Not applicable	10.9%	14
	Totals	128

24.Please rate your level of agreement with each of the following statements

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
During my child's last IEP meeting, I felt I was a valued member of the team and my opinion was respected.	68	53.1%	45	35.2%	5	3.9%	6	4.7%	4	3.1%	128
During my child's last IEP meeting, the team discussed my child receiving special education services in the general education class to the	54	42.5%	52	40.9%	9	7.1%	5	3.9%	7	5.5%	127

maximum extent appropriate.											
The information I provided about my child during his/her most recent IEP meeting was considered when planning and writing the IEP.	59	46.5%	53	41.7%	6	4.7%	5	3.9%	4	3.1%	127
I feel comfortable asking questions and expressing concerns at IEP meetings.	67	52.8%	48	37.8%	4	3.1%	4	3.1%	4	3.1%	127
Adequate time is allotted for	58	45.7%	58	45.7%	3	2.4%	4	3.1%	4	3.1%	127

the IEP meeting to discuss my child's needs.											

My child is getting the amount and type of services that are listed in their IEP.
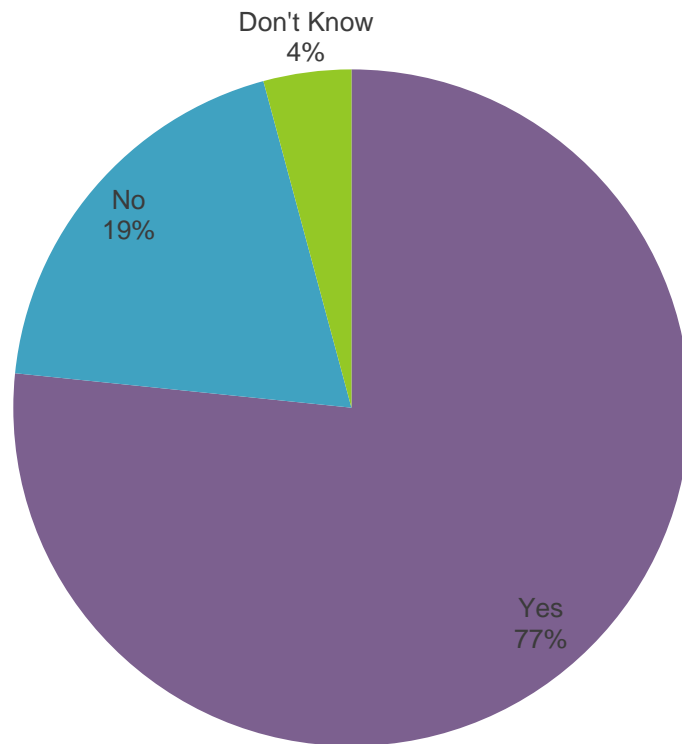
Value	Percent	Count
Yes	76.7%	92
No	19.2%	23

Don't Know	4.2%	5
	Totals	120

Is your response related to COVID-19 and its impact on the 2019-20, 2020-21 school years?
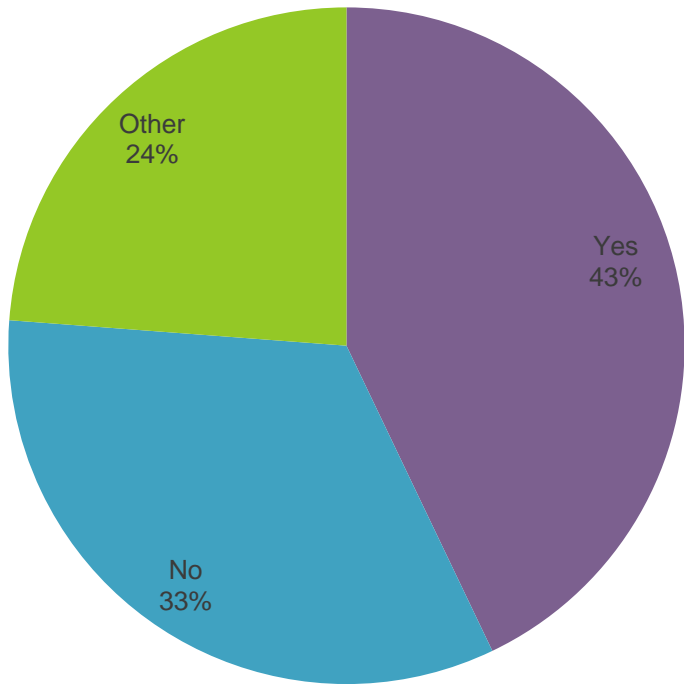
Value	Percent	Count
Yes	42.9%	9
No	33.3%	7

Other	23.8%	5
	Totals	21

Please rate your level of agreement with each of the following statements

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
I receive formal IEP progress reports that indicate how my child is meeting their IEP goals.	46	38.3%	50	41.7%	11	9.2%	8	6.7%	5	4.2%	120
My child's IEP tells me how progress towards goals will be measured.	41	34.2%	56	46.7%	12	10.0%	4	3.3%	7	5.8%	120
I receive regular, timely information about my child's performance	36	30.3%	44	37.0%	26	21.8%	8	6.7%	5	4.2%	119

from their teachers.											
My child is making progress towards their goals.	32	26.7%	59	49.2%	13	10.8%	4	3.3%	12	10.0%	120
My child's special education teachers possess the knowledge needed to address their learning needs.	46	38.3%	43	35.8%	9	7.5%	5	4.2%	17	14.2%	120
My child's general education teachers possess the knowledge needed to address their learning needs.	36	30.0%	35	29.2%	21	17.5%	6	5.0%	22	18.3%	120

The paraprofessionals assigned to support my child possess the knowledge needed to address their learning needs.
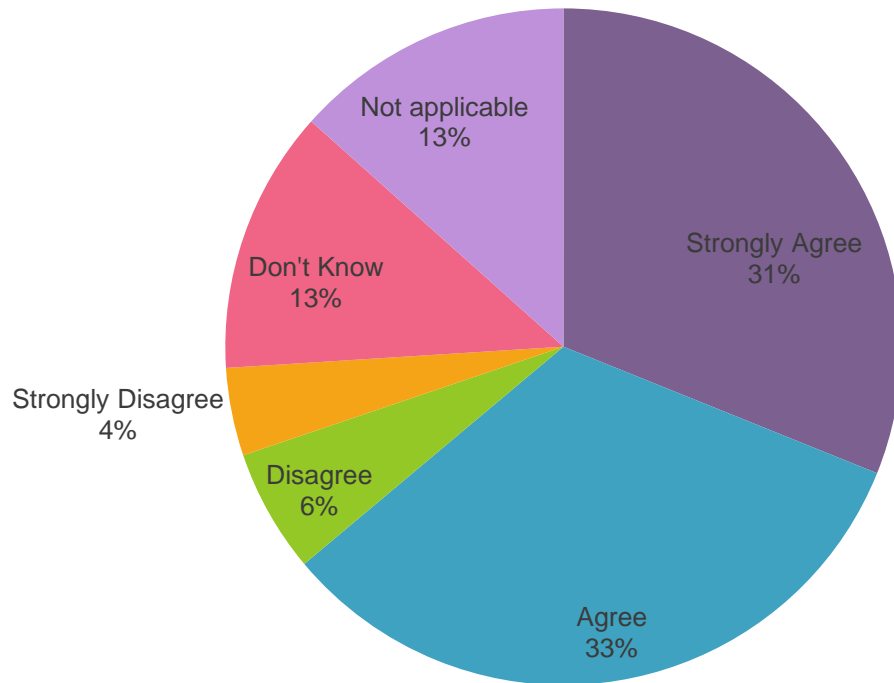
Value	Percent	Count
Strongly Agree	31.1%	37
Agree	32.8%	39

|		
Disagree	5.9%	7
Strongly Disagree	4.2%	5
Don't Know	12.6%	15
Not applicable	13.4%	16
	Totals	119

Please rate your level of agreement with each of the following statements

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
The staff working with my child have read and fully reviewed their IEP.	36	29.8%	35	28.9%	15	12.4%	1	0.8%	34	28.1%	121
The staff working with my child implement their IEP with consistency.	33	27.3%	40	33.1%	24	19.8%	3	2.5%	21	17.4%	121
There is an adequate number of staff to implement my child's IEP with consistency.	34	28.1%	54	44.6%	12	9.9%	4	3.3%	17	14.0%	121
General and special education teachers collaborate in planning and delivering	30	24.8%	39	32.2%	15	12.4%	7	5.8%	30	24.8%	121

instruction to my child.											
Special education teachers and paraprofessionals collaborate in planning and delivering instruction to my child.	36	30.5%	40	33.9%	15	12.7%	3	2.5%	24	20.3%	118
My child's teachers have high expectations for them.	32	26.9%	52	43.7%	16	13.4%	4	3.4%	15	12.6%	119
I am satisfied with my child's overall special education services.	39	32.2%	48	39.7%	22	18.2%	8	6.6%	4	3.3%	121

Please rate your level of agreement with each of the following statements

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
The IEP team developed individualized goals related to postsecondary education, employment, independent living, and community participation for my child.	6	14.3%	11	26.2%	12	28.6%	5	11.9%	8	19.0%	42
The IEP team identified transition services (for example community service, independent living skills, etc.) to help my child.	3	7.7%	5	12.8%	13	33.3%	5	12.8%	13	33.3%	39

My child's transition plan is preparing them for life after high school.	4	10.0%	6	15.0%	10	25.0%	4	10.0%	16	40.0%	40

Does your child have behavioral needs and/or challenges?
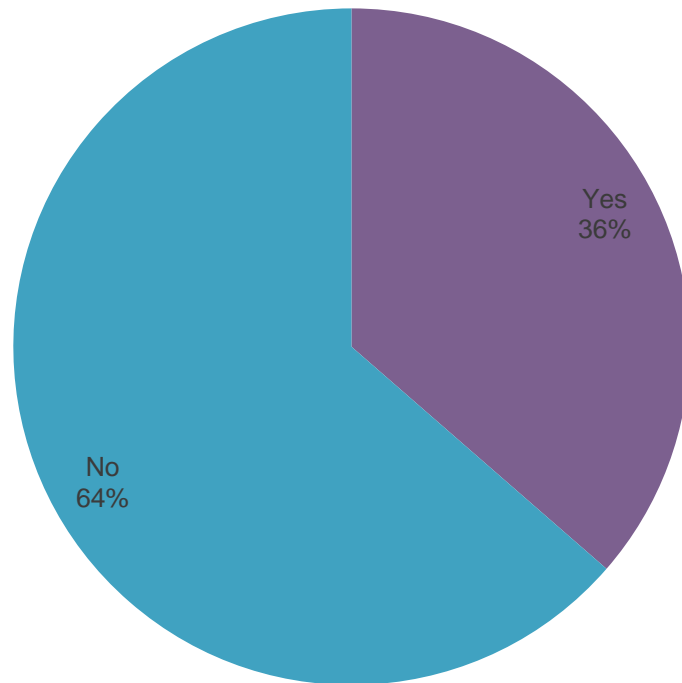
Value	Percent	Count
Yes	36.4%	44
No	63.6%	77

	Totals	121

Has your child had a Functional Behavior Assessment (FBA)?
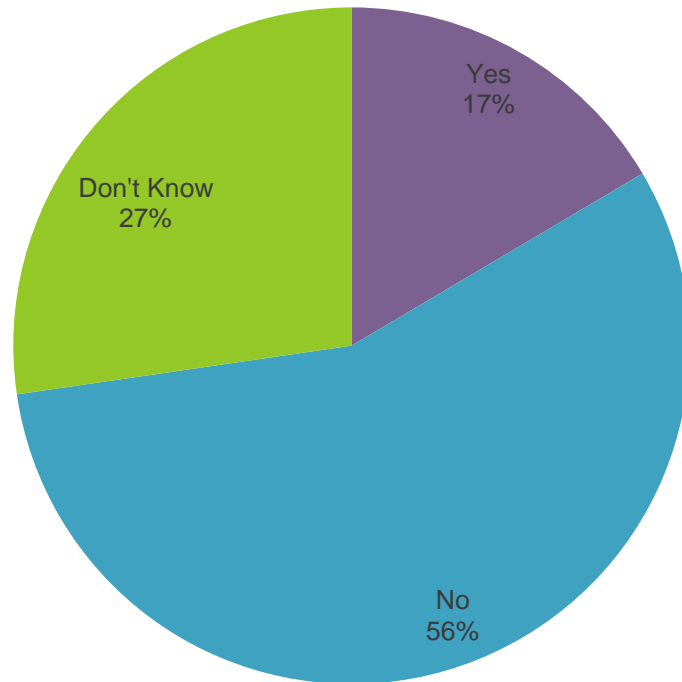
Value	Percent	Count
Yes	16.5%	20
No	56.2%	68

Don't Know	27.3%	33
	Totals	121

Did the FBA result in a Behavior Intervention Plan (BIP)?
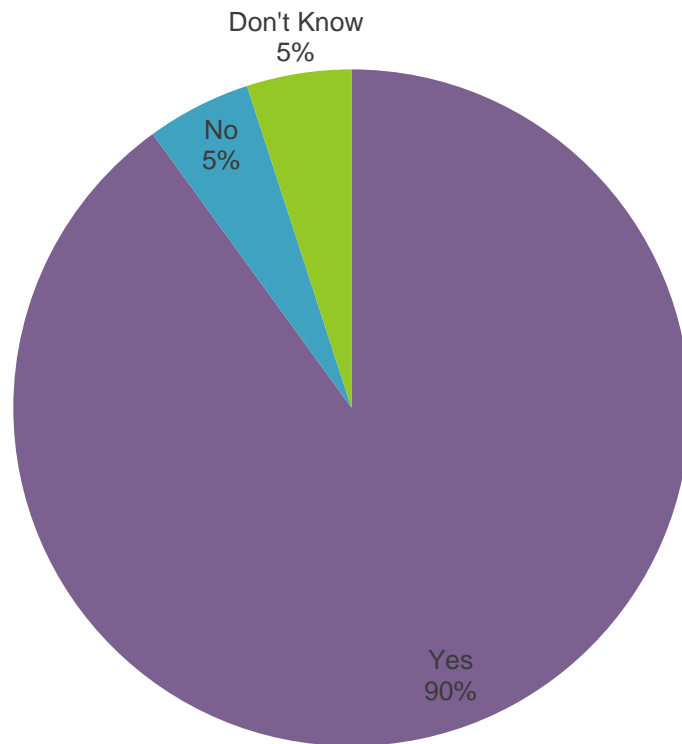
Value	Percent	Count
Yes	90.0%	18
No	5.0%	1

Don't Know	5.0%	1
	Totals	24

Please rate your level of agreement with each of the following statements

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
My child's BIP is being implemented by staff members with fidelity.	1	50.0%	1	50.0%	0	%	0	%	0	%	2
Staff at my child's school possess the skills needed to address their behavior needs.	1	50.0%	0	%	1	50.0%	0	%	0	%	2
My child's BIP is effectively supporting my child's behavior needs.	1	50.0%	1	50.0%	0	%	0	%	0	%	2

135

	Yes		No		Responses
	Count	Row %	Count	Row %	Count
Has your child ever been restrained at school because of their behavior?	14	11.6%	107	88.4%	121
Has your child ever been separated (secluded) from their class at school because of their behavior?	29	24.0%	92	76.0%	121
Has PPS's approach to restraint and seclusion been discussed at your child's IEP meeting?	20	16.7%	100	83.3%	120

At any point in the past three years, has a special education advocate or legal counsel attended your child's IEP team meeting with you?
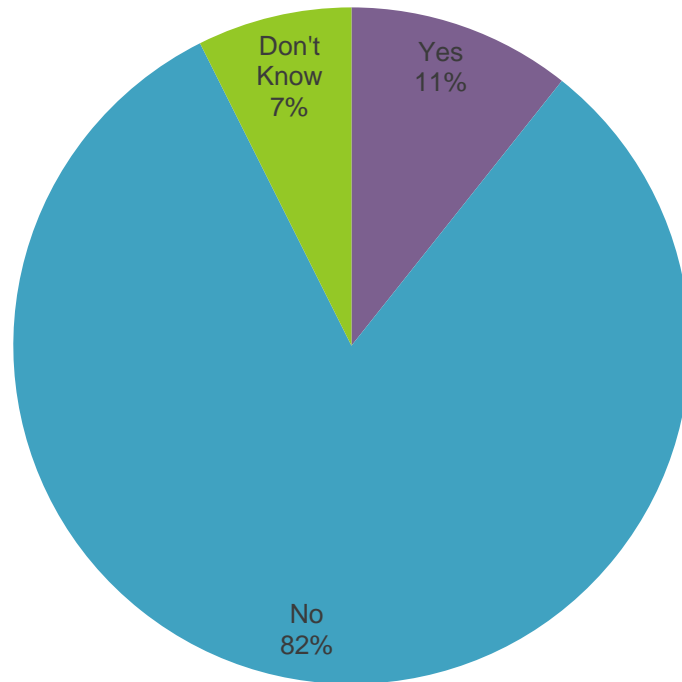
Value	Percent	Count
Yes	10.7%	13
No	82.0%	100

Don't Know	7.4%	9
	Totals	122

Have you ever had disagreements with your child's school regarding his/her special education eligibility, placement, goals, services, or IEP implementation?
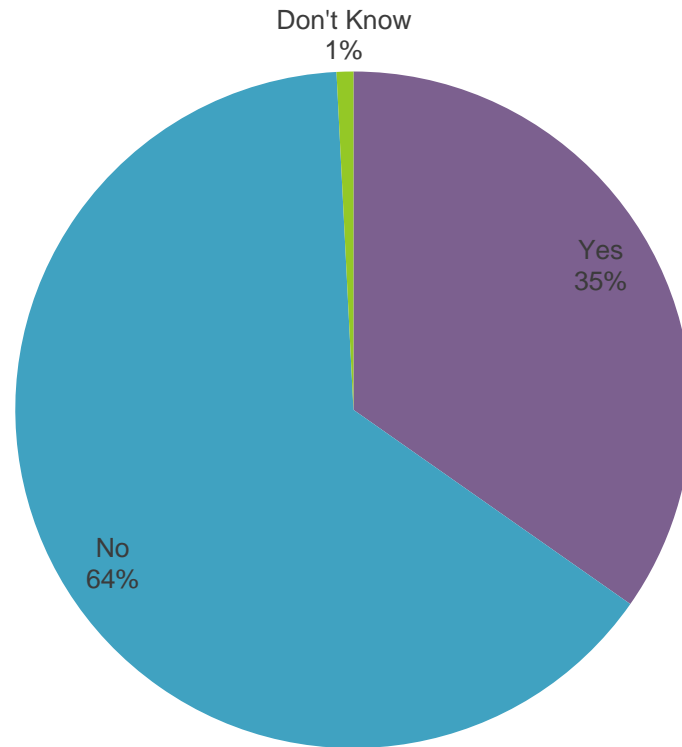
Value	Percent	Count
Yes	34.7%	41

No	64.4%	76
Don't Know	0.8%	1
	Totals	118

I was satisfied with how the school attempted to resolve the disagreement.
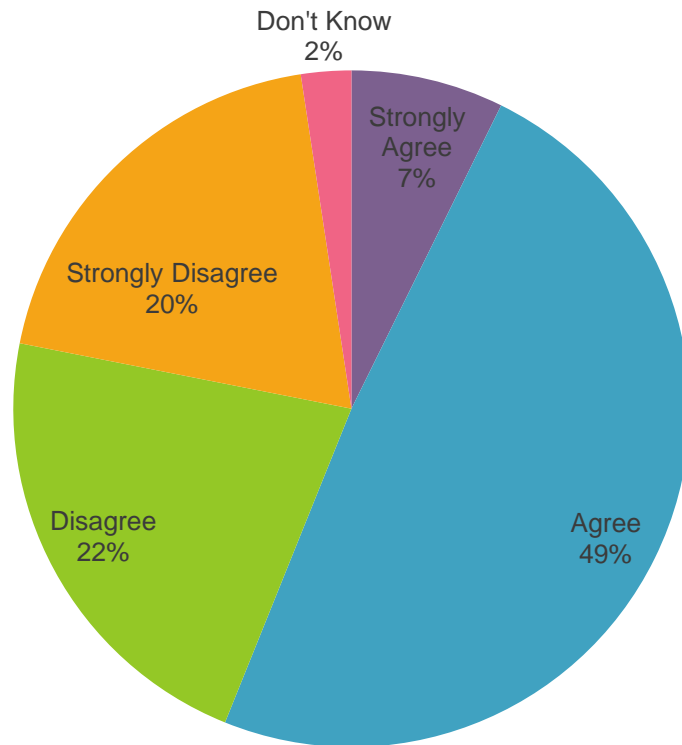
Value	Percent	Count
Strongly Agree	7.3%	3
Agree	48.8%	20

Disagree	22.0%	9
Strongly Disagree	19.5%	8
Don't Know	2.4%	1
	Totals	41

If the disagreement was escalated to central office, I was satisfied with how the district attempted to resolve the disagreement.
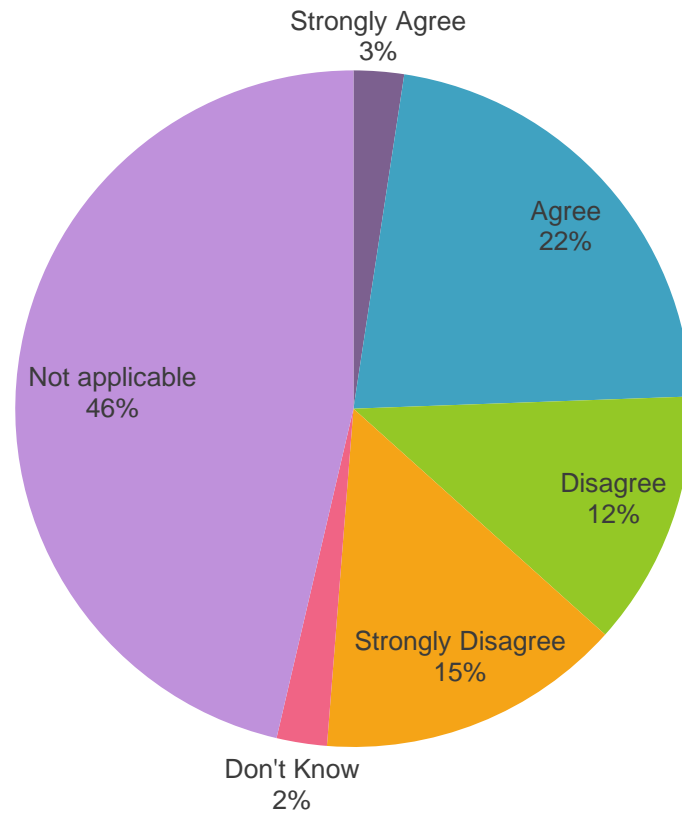
Value	Percent	Count
Strongly Agree	2.4%	1
Agree	22.0%	9

Disagree	12.2%	5
Strongly Disagree	14.6%	6
Don't Know	2.4%	1
Not applicable	46.3%	19
	Totals	41

Have you participated in mediation with the district to resolve a disagreement about your child's special education services?
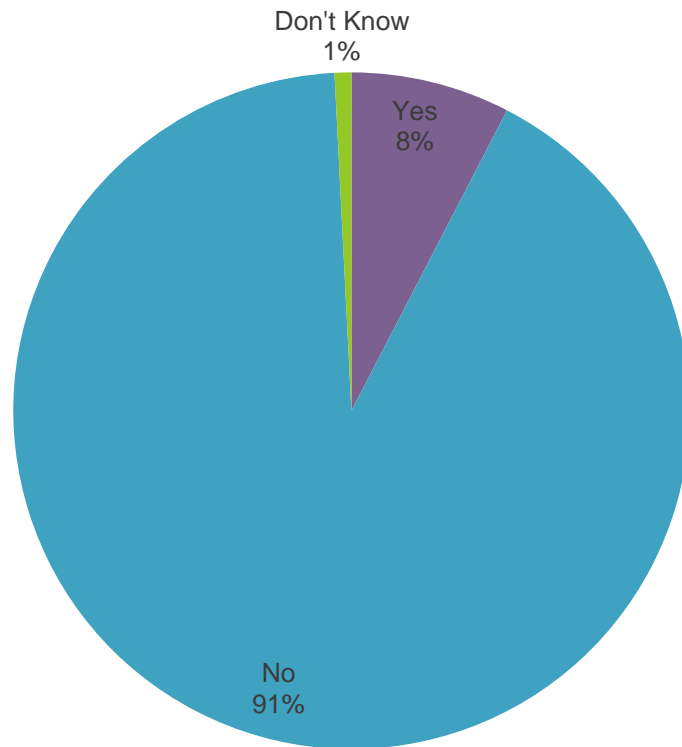
Value	Percent	Count
Yes	7.6%	9
No	91.5%	108

Don't Know	0.8%	1
	Totals	118

Please rate your level of agreement with each of the following statements.

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
Teachers/school staff communicate effectively with me.	36	29.0%	65	52.4%	16	12.9%	4	3.2%	3	2.4%	124
Central administration staff communicate effectively with me.	30	24.8%	45	37.2%	26	21.5%	11	9.1%	9	7.4%	121
School staff respond to my concerns within a reasonable time period.	44	36.7%	61	50.8%	11	9.2%	0	%	4	3.3%	120

There is sufficient communication between PPS and my child's current program/school.
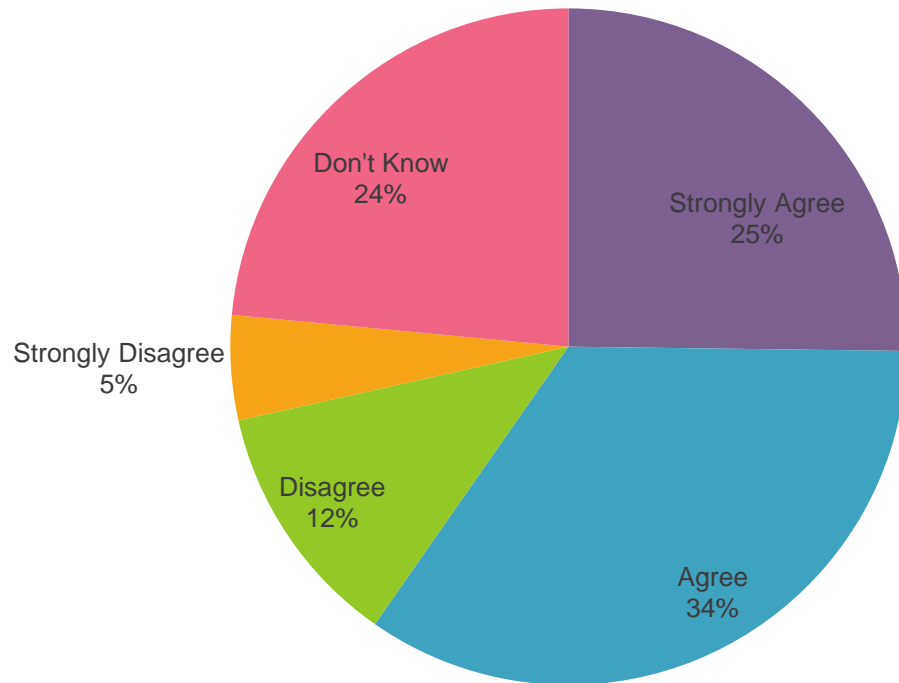
Value	Percent	Count
Strongly Agree	25.2%	30
Agree	34.5%	41

Disagree	11.8%	14
Strongly Disagree	5.0%	6
Don't Know	23.5%	28
	Totals	119

.What school does your child attend?
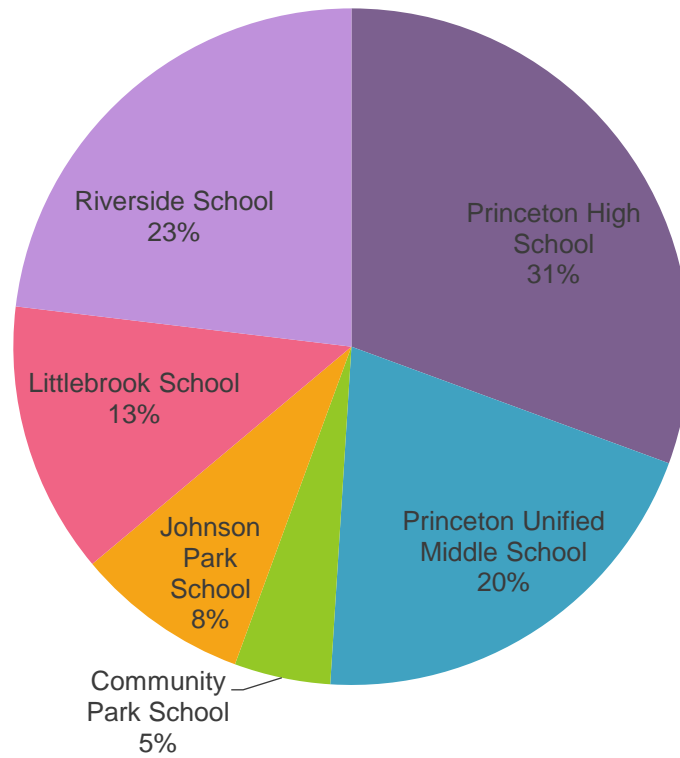
Value	Percent	Count
Princeton High School	30.6%	33
Princeton Unified Middle School	20.4%	22

Community Park School	4.6%	*
Johnson Park School	8.3%	9
Littlebrook School	13.0%	14
Riverside School	23.1%	25
	Totals	108

55.Please indicate your race/ethnicity.
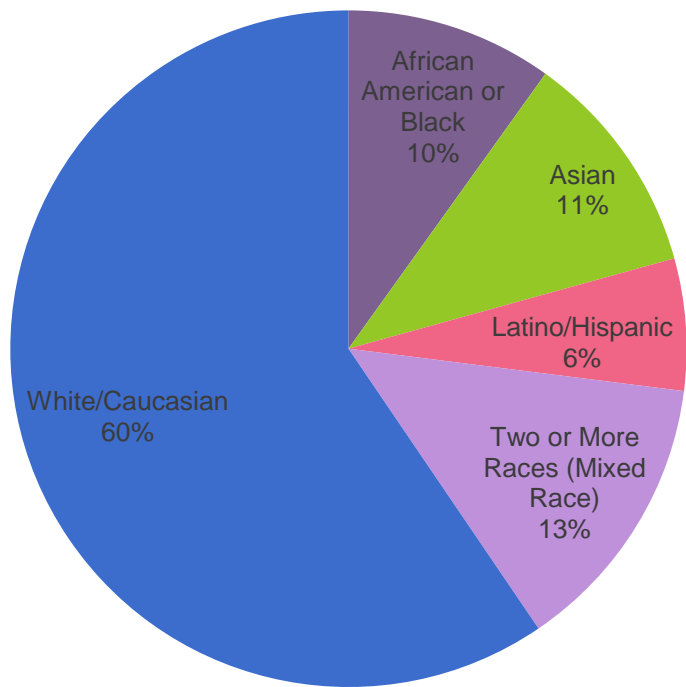
Value	Percent	Count
African American or Black	9.9%	11
Asian	10.8%	12

Latino/Hispanic	*	*
Two or More Races (Mixed Race)	13.5%	15
White/Caucasian	59.5%	66
	Totals	111

Response Statistics

Which one of the following best describes your position relative to special education services?
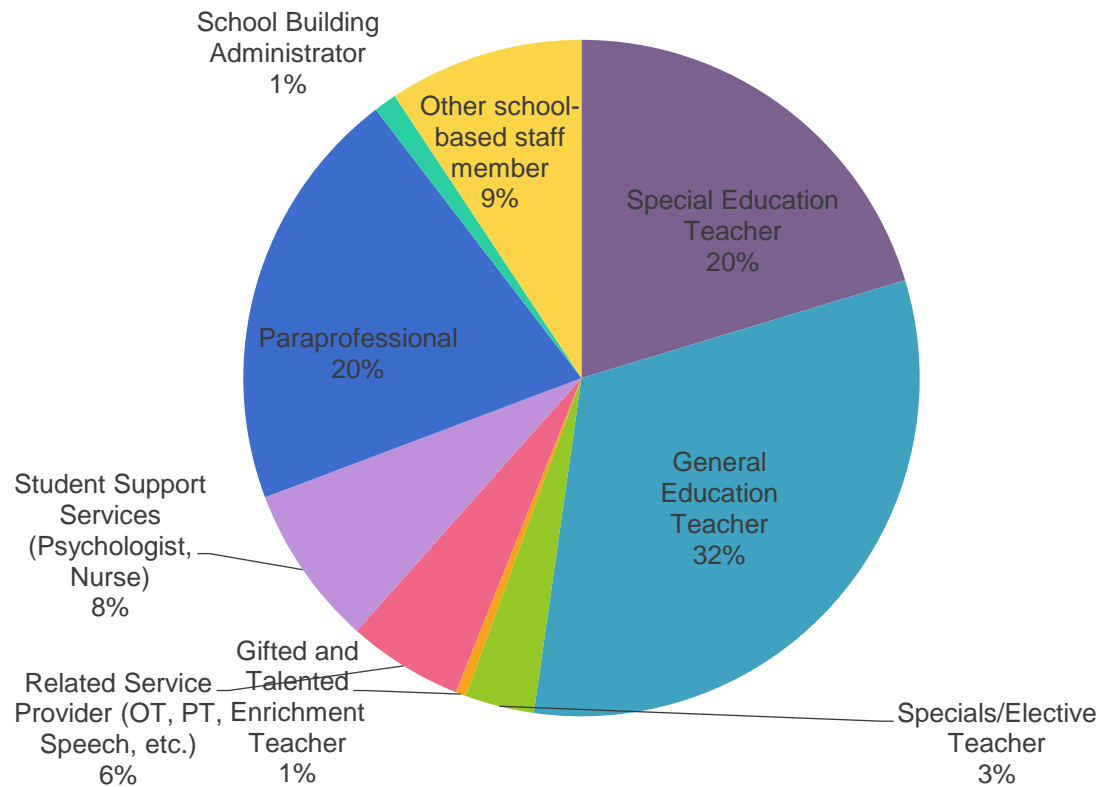
Value	Percent	Count

Special Education Teacher	20.3%	37
General Education Teacher	31.9%	58
Specials/Elective Teacher	3.3%	*
Related Service Provider (OT, PT, Speech, etc.)	5.5%	10
Student Support Services (Psychologist, Nurse)	7.7%	14
Paraprofessional	20.3%	37
Other school-based staff member	9.3%	17
	Totals	182

Please select the primary grade level you serve.
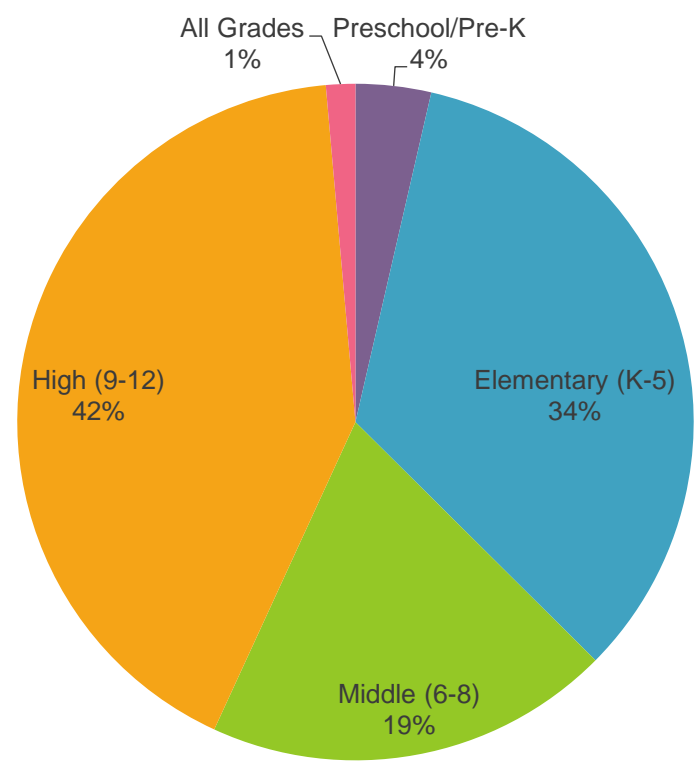
Value	Percent	Count

Preschool/Pre-K	3.6%	*
Elementary (K-5)	33.8%	47
Middle (6-8)	19.4%	27
High (9-12)	41.7%	58
All Grades	1.4%	*
	Totals	139

Please rate your level of agreement with each of the following statements

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Not Applicable		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
Before a student is referred for special education, every attempt is made to meet the student's needs through general education	29	20.9%	65	46.8%	17	12.2%	5	3.6%	20	14.4%	3	2.2%	139

interventions.													
Our school provides sufficient Tier 1 general education reading intervention support. (Tier 1 means all students receive high-quality, scientifically based instruction provided by qualified General Education personnel in general education.)	25	18.7%	55	41.0%	24	17.9%	6	4.5%	23	17.2%	1	0.7%	134
Our school provides sufficient Tier 1 general education math intervention support.	18	13.4%	37	27.6%	27	20.1%	12	9.0%	34	25.4%	6	4.5%	134
Our school provides sufficient Tier 1	12	9.0%	51	38.1%	29	21.6%	7	5.2%	32	23.9%	3	2.2%	134

general education behavior intervention support.													
Prior to a referral for special education, the impact of a child's native language on academic performance or behavior is considered.	18	13.3%	63	46.7%	13	9.6%	6	4.4%	35	25.9%	0	%	135
I fully understand the steps and timelines associated with the referral process.	34	25.2%	59	43.7%	19	14.1%	2	1.5%	14	10.4%	7	5.2%	135
I am comfortable recommending a student be referred for a special education evaluation.	36	26.7%	52	38.5%	15	11.1%	4	3.0%	5	3.7%	23	17.0%	135
Staff in my school(s) fully understand the	22	16.3%	34	25.2%	49	36.3%	7	5.2%	17	12.6%	6	4.4%	135

steps and timelines associated with the referral process.													
I have been invited to participate in IEP meeting(s).	78	57.8%	40	29.6%	2	1.5%	1	0.7%	0	%	14	10.4%	135
I am given adequate time/coverage when participating in IEP meeting(s).	31	23.0%	56	41.5%	23	17.0%	3	2.2%	1	0.7%	21	15.6%	135
I am a valued member of the IEP team.	34	25.2%	65	48.1%	10	7.4%	2	1.5%	9	6.7%	15	11.1%	135
I feel comfortable asking questions at IEP meetings.	47	35.3%	62	46.6%	7	5.3%	0	%	1	0.8%	16	12.0%	133
I feel comfortable expressing concerns at IEP meetings.	46	34.1%	62	45.9%	9	6.7%	1	0.7%	2	1.5%	15	11.1%	135

The IEP process involves collaboration between general education teachers, special educators, and parents.	57	42.2%	59	43.7%	14	10.4%	0	%	1	0.7%	4	3.0%	135
Parents are given a meaningful opportunity to participate in IEP meetings.	52	38.5%	60	44.4%	7	5.2%	0	%	11	8.1%	5	3.7%	135
All team member concerns are addressed at IEP meetings.	20	14.9%	74	55.2%	18	13.4%	2	1.5%	12	9.0%	8	6.0%	134
Special education evaluations are sufficiently comprehensive to identify students' specific strengths and needs.	26	19.4%	71	53.0%	12	9.0%	2	1.5%	22	16.4%	1	0.7%	134
The results of special education evaluations are shared with me in ways that provide	24	17.9%	62	46.3%	36	26.9%	4	3.0%	1	0.7%	7	5.2%	134

meaningful insights into students' educational needs.													
The IEP team discusses instruction and support in general education classes to the maximum extent possible when making service recommendations for students with disabilities.	23	17.4%	63	47.7%	22	16.7%	6	4.5%	13	9.8%	5	3.8%	132

Are you familiar with and/or have you received training in Universal Design for Learning (UDL)?

Yes
45%

No
55%
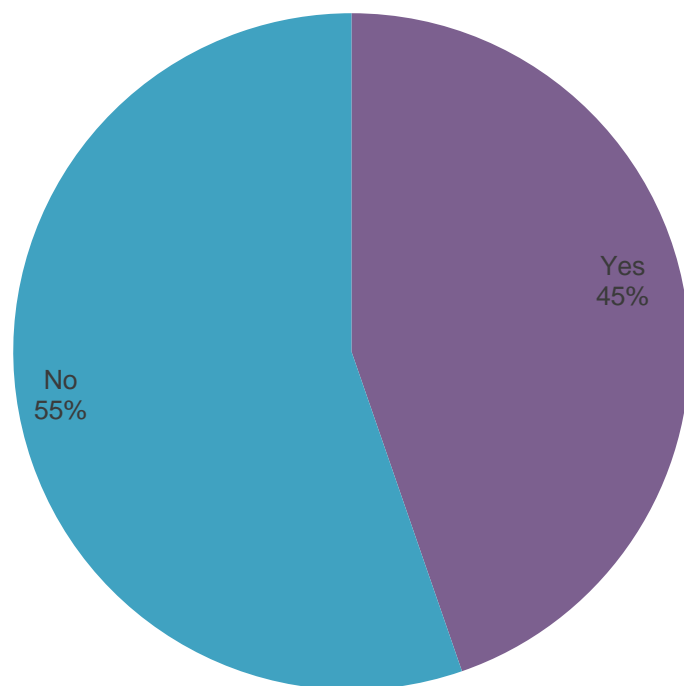
Value	Percent	Count
Yes	44.7%	59
No	55.3%	73
	Totals	132

Please rate your level of agreement with each of the following statements

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Not Applicable		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
PPS offers a continuum of services to meet the needs of all students with IEPs.	21	16.8%	72	57.6%	19	15.2%	1	0.8%	10	8.0%	2	1.6%	125
Students with IEPs in my school(s) are receiving instruction and services in general education classes to the maximum extent	27	22.0%	61	49.6%	18	14.6%	3	2.4%	13	10.6%	1	0.8%	123

possible.													
Students with disabilities at my school(s) are treated with respect by school staff and students.	49	39.8%	62	50.4%	11	8.9%	0	%	1	0.8%	0	%	123
My school(s) provide an inclusive environment for students with disabilities.	38	30.9%	70	56.9%	13	10.6%	0	%	2	1.6%	0	%	123
Student progress toward IEP goals is analyzed and discussed regularly by his/her teachers and/or related service provider(s).	21	17.1%	58	47.2%	23	18.7%	2	1.6%	16	13.0%	3	2.4%	123
There is an adequate number of staff to implement student IEPs with fidelity.	11	8.9%	45	36.6%	39	31.7%	15	12.2%	11	8.9%	2	1.6%	123
Staff in my building are provided adequate time/coverage to	7	5.8%	28	23.3%	29	24.2%	11	9.2%	39	32.5%	6	5.0%	120

develop IEPs.												
I understand what is documented within students' IEPs.	47	38.8%	56	46.3%	9	7.4%	0	%	3	2.5%	6	5.0%	121
I am confident in how to implement IEPs as written.	37	30.3%	56	45.9%	15	12.3%	0	%	3	2.5%	11	9.0%	122
Special education teachers at my school are used effectively to support the needs of students with IEPs.	27	22.1%	57	46.7%	22	18.0%	6	4.9%	10	8.2%	0	%	122
General education teachers are provided adequate training in effectively supporting the needs of students with IEPs.	6	4.9%	27	22.0%	52	42.3%	22	17.9%	16	13.0%	0	%	123
Paraprofessionals at my school(s) are used effectively to support the needs of students with IEPs.	14	11.5%	51	41.8%	31	25.4%	12	9.8%	14	11.5%	0	%	122
Related Service providers (OT, PT,	21	17.1%	66	53.7%	14	11.4%	2	1.6%	19	15.4%	1	0.8%	123

Speech Therapists) at my school are used effectively to support the needs of students with IEPs.													
The special education/related services, accommodations, and/or modifications identified in students' IEPs are provided as written.	19	15.4%	67	54.5%	17	13.8%	2	1.6%	16	13.0%	2	1.6%	123
School administrators have high expectations for students with disabilities.	24	19.5%	59	48.0%	15	12.2%	1	0.8%	24	19.5%	0	%	123
The special education teaching staff have high expectations for students with disabilities.	38	30.9%	57	46.3%	11	8.9%	1	0.8%	16	13.0%	0	%	123
The general education teaching staff have high expectations for students with	17	13.9%	67	54.9%	21	17.2%	2	1.6%	15	12.3%	0	%	122

disabilities.													
Related service providers have high expectations for students with disabilities.	27	22.0%	66	53.7%	4	3.3%	0	%	25	20.3%	1	0.8%	123
Related service providers can meet the service times of all students on their caseloads.	5	4.1%	31	25.2%	29	23.6%	8	6.5%	45	36.6%	5	4.1%	123
PPS has established standards for delivering co-teaching/collaborative instruction.	14	11.4%	41	33.3%	26	21.1%	24	19.5%	15	12.2%	3	2.4%	123
Services for dually-identified (English Language Learner students with disabilities) students at my school(s) are meeting student needs.	8	6.6%	31	25.4%	28	23.0%	13	10.7%	38	31.1%	4	3.3%	122
There is a well-articulated approach in my school(s) to	10	8.1%	32	26.0%	46	37.4%	16	13.0%	17	13.8%	2	1.6%	123

address the behavior needs of students with disabilities.													
Students with IEPs have adequate services in place to manage challenging behavior in the classroom.	12	9.8%	43	35.0%	36	29.3%	12	9.8%	18	14.6%	2	1.6%	123
Services for students with disabilities also enrolled in gifted and talented enrichment programming are meeting their needs.	8	6.6%	11	9.0%	13	10.7%	9	7.4%	52	42.6%	29	23.8%	122
Modern, or current, instructional technology is considered when recommending accommodations for students with disabilities	20	16.3%	58	47.2%	13	10.6%	4	3.3%	28	22.8%	0	%	123
The special education program/services at my school(s) are of high quality.	26	21.1%	72	58.5%	8	6.5%	4	3.3%	13	10.6%	0	%	123

The special education program/services across all PPS schools are of high quality.	14	11.5%	42	34.4%	9	7.4%	1	0.8%	55	45.1%	1	0.8%	122

Planning effective services and activities for postsecondary transition begins for students at age 14 at my school(s).
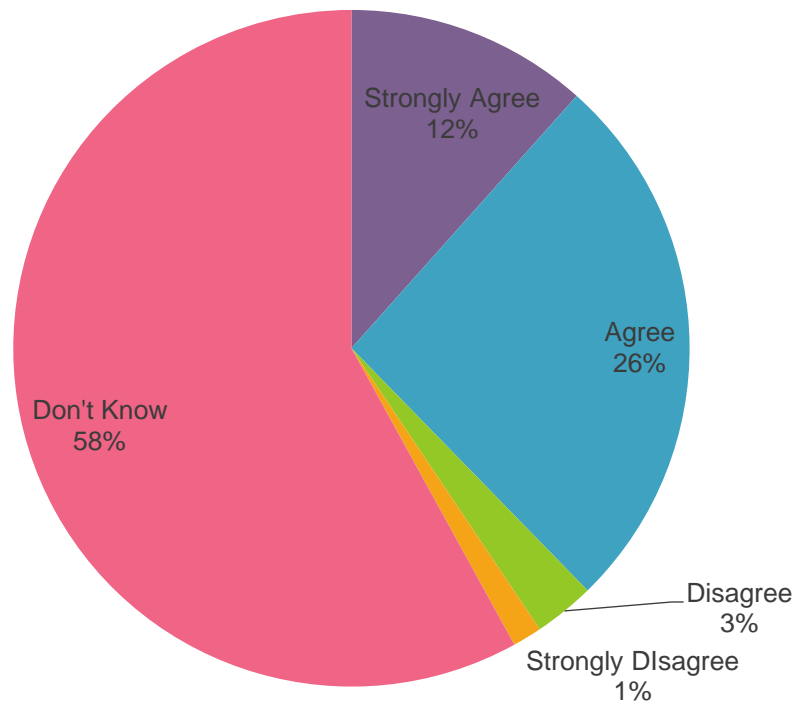
Value	Percent	Count
Strongly Agree	11.6%	8
Agree	26.1%	18
Disagree	2.9%	2

Strongly DIsagree	1.4%	1
Don't Know	58.0%	40
	Totals	69

Please rate your level of agreement with each of the following statements

	Strongly Agree		Agree		Disagree		Strongly Disagree		Don't Know		Not Applicable		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
Staff in my building(s) have an effective process by which they collaborate with each other regarding the needs of students with disabilities.	10	8.0%	53	42.4%	49	39.2%	4	3.2%	8	6.4%	1	0.8%	125
General and special education teachers have collaborative planning time to prepare effective	5	4.1%	24	19.8%	42	34.7%	27	22.3%	20	16.5%	3	2.5%	121

Statement													
instruction for students with IEPs.													
There is sufficient communication between general and special educators about the needs and progress of students with IEPs.	5	4.2%	40	33.3%	40	33.3%	15	12.5%	18	15.0%	2	1.7%	120
There is sufficient communication between special educators and paraprofessionals about the needs and progress of students with IEPs.	10	8.3%	49	40.5%	22	18.2%	13	10.7%	24	19.8%	3	2.5%	121
Case managers provide sufficient support to instructional staff to meet the needs of students with IEPs.	15	12.4%	44	36.4%	29	24.0%	17	14.0%	14	11.6%	2	1.7%	121

My school(s) effectively responds to the needs and concerns of families of students with IEPs.	26	21.5%	63	52.1%	13	10.7%	1	0.8%	17	14.0%	1	0.8%	121
I have been provided adequate training in communicating with parents of students with disabilities.	18	14.9%	45	37.2%	43	35.5%	9	7.4%	1	0.8%	5	4.1%	121
Parents have been provided adequate training to support students with IEPs at home.	7	5.8%	17	14.0%	29	24.0%	8	6.6%	59	48.8%	1	0.8%	121
The central special education office effectively responds to the needs and concerns of families of students with IEPs.	16	13.2%	33	27.3%	15	12.4%	2	1.7%	52	43.0%	3	2.5%	121

There is effective and consistent communication between my building(s) and the central special education office.	9	7.4%	18	14.9%	15	12.4%	14	11.6%	63	52.1%	2	1.7%	121

Professional development offerings I have attended enable me to better support the teaching/learning of students with IEPs.
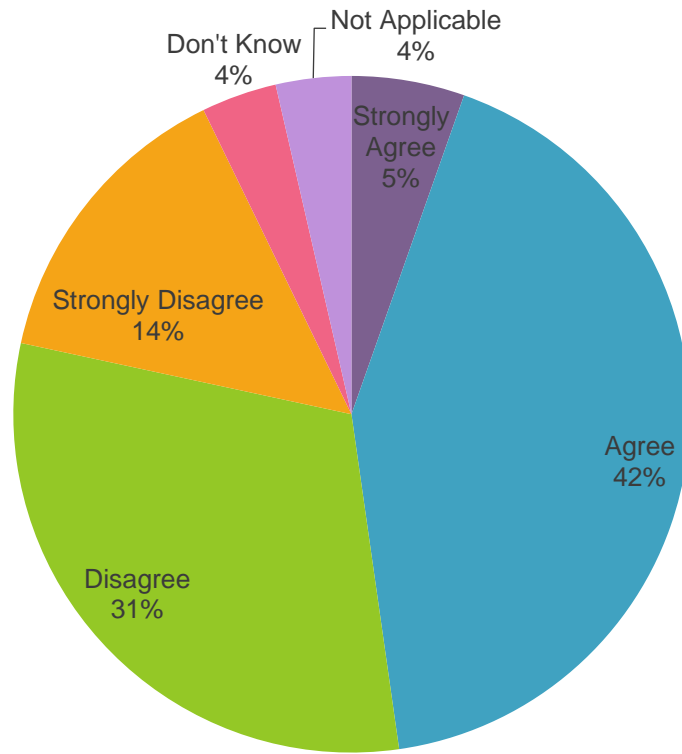
Value	Percent	Count
Strongly Agree	5.4%	6
Agree	42.3%	47
Disagree	30.6%	34

| Strongly Disagree	14.4%	16
Don't Know	3.6%	4
Not Applicable	3.6%	4
	Totals	111

I would like to attend professional development on the following topics:

	Strongly Agree		Agree		Disagree		Strongly Disagree		Not Applicable		Responses
	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count	Row %	Count
Differentiated Instruction	21	18.4%	55	48.2%	18	15.8%	11	9.6%	9	7.9%	114
Increasingly intensive reading interventions	20	17.4%	52	45.2%	17	14.8%	4	3.5%	22	19.1%	115
Increasingly intensive math interventions	16	13.9%	48	41.7%	16	13.9%	5	4.3%	30	26.1%	115
Positive behavior intervention and	26	22.8%	63	55.3%	17	14.9%	2	1.8%	6	5.3%	114

supports											
Response to Intervention (RtI) or Multi-Tiered System of Supports (MTSS)	19	16.5%	64	55.7%	18	15.7%	2	1.7%	12	10.4%	115
Facilitating inclusion in general education	28	24.1%	63	54.3%	14	12.1%	4	3.4%	7	6.0%	116
Developing functional behavior assessments (FBAs)	11	9.6%	43	37.4%	27	23.5%	7	6.1%	27	23.5%	115
Developing behavior intervention plans (BIPs)	18	15.8%	40	35.1%	25	21.9%	6	5.3%	25	21.9%	114
Teaching students with curriculum aligned with alternate assessments	20	17.2%	60	51.7%	17	14.7%	4	3.4%	15	12.9%	116
Specific disability information (e.g.,	24	20.9%	57	49.6%	22	19.1%	6	5.2%	6	5.2%	115

autism, emotional disturbance, etc.)										
Independent living skills	12	10.8%	25	22.5%	27	24.3%	10	9.0%	37	33.3%	111
Assistive technology	15	12.8%	62	53.0%	16	13.7%	8	6.8%	16	13.7%	117
Collaborating with Paraprofessionals	30	26.3%	48	42.1%	19	16.7%	4	3.5%	13	11.4%	114
Federal, state, and division special education regulations	18	15.9%	43	38.1%	25	22.1%	8	7.1%	19	16.8%	113
Postsecondary transition planning	9	8.0%	27	23.9%	22	19.5%	12	10.6%	43	38.1%	113
Using/analyzing data to inform instruction	18	15.9%	48	42.5%	24	21.2%	5	4.4%	18	15.9%	113
Universal Design for Learning (UDL)	17	14.5%	64	54.7%	17	14.5%	4	3.4%	15	12.8%	117

At what school do you work?
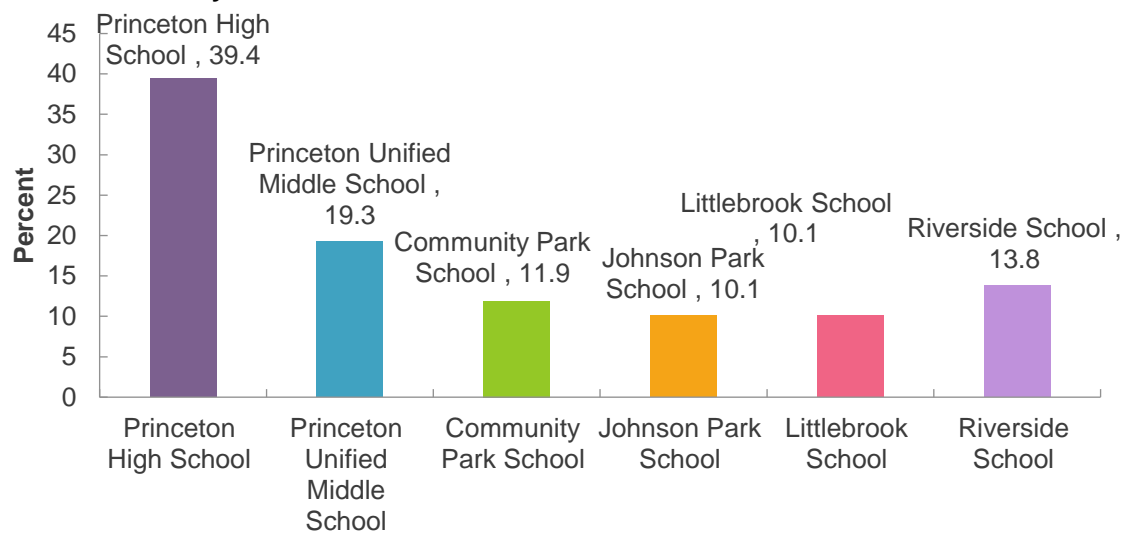
	Percent	Count
Princeton High School	39.4%	43
Princeton Unified Middle School	19.3%	21
Community Park School	11.9%	13
Johnson Park School	10.1%	11
Littlebrook School	10.1%	11
Riverside School	13.8%	15

Please select how many year(s) you have worked in the district
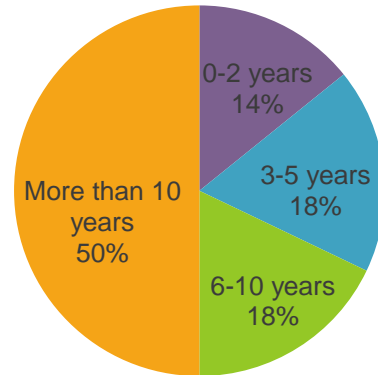
Value	Percent	Count
0-2 years	14.2%	15
3-5 years	17.9%	19
6-10 years	17.9%	19
More than 10 years	50.0%	53
	Totals	106