

Princeton Public Schools

Comprehensive Special Education Review

May 25, 2021

EXECUTIVE SUMMARY

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I. PURPOSE OF STUDY AND METHODOLOGY

EXECUTIVE SUMMARY

This document is the Executive Summary to the Comprehensive Special Education Program Review for Princeton Public Schools. Although it contains all the recommendations within the final report, it does not include tables, graphs, or survey data. For a further study of this report's findings, it is highly recommended to review the final report in its entirety.

PURPOSE OF STUDY

Princeton Public Schools (PPS) selected Public Consulting Group (PCG) through a competitive bidding process to conduct a comprehensive special education program review. The final 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 through its RFP:

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:

PCG GUIDING QUESTIONS AND PPS RFP SPECIFICATIONS

PCG Guiding Questions	PPS RFP Specifications
<ul style="list-style-type: none"> ▪ How is the District's continuum of services organized to support a Free and Appropriate Education (FAPE)? 	<ul style="list-style-type: none"> ▪ <i>Program Offerings / Continuum of Services</i> ▪ <i>Special Education Code NJAC 6A;14 (Monitoring and Compliance)</i> ▪ <i>Professional Development</i>
<ul style="list-style-type: none"> ▪ To what degree do students with disabilities have access to the general education curriculum? 	<ul style="list-style-type: none"> ▪ <i>Program Offerings / Continuum of Services</i> ▪ <i>Special Education Code NJAC 6A;14 (Monitoring and Compliance)</i>
<ul style="list-style-type: none"> ▪ How are funds budgeted and what are the major cost drivers? 	<ul style="list-style-type: none"> ▪ <i>Resources</i>
<ul style="list-style-type: none"> ▪ How are inclusive practices employed? 	<ul style="list-style-type: none"> ▪ <i>Consistency in Procedure</i> ▪ <i>Program Offerings / Continuum of Services</i> ▪ <i>Special Education Code NJAC 6A;14 (Monitoring and Compliance)</i>
<ul style="list-style-type: none"> ▪ 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? 	<ul style="list-style-type: none"> ▪ <i>Consistency in Procedure</i> ▪ <i>Process & Programming, and Articulation Between Schools</i>
<ul style="list-style-type: none"> ▪ How has PPS's school and district 	<ul style="list-style-type: none"> ▪ <i>Consistency in Procedure</i>

<p>leadership fostered a culture that is focused on improving outcomes and post-secondary preparation?</p>	<ul style="list-style-type: none"> ▪ <i>Process & Programming, and Articulation Between Schools</i> ▪ <i>Resources</i> ▪ <i>Parent Relations Professional Development</i>
<ul style="list-style-type: none"> ▪ 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? 	<ul style="list-style-type: none"> ▪ <i>Special Education Code NJAC 6A:14 (Monitoring and Compliance)</i> ▪ <i>Professional Development</i>

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.¹ 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

¹ Patton, Michael Quinn. 2002. *Qualitative Research and Evaluation Methods*. 3rd Edition. Thousand Oaks, CA: Sage Publications

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.

LOCAL CONTEXT

Princeton Public Schools Community and Demographics

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.²

In the 2019-20 school year, approximately 16.4% of PPS' students were classified with a disability and have an Individualized Education Plan (IEP).³ This is slightly lower than the 2019-20 state average of 17.4%.⁴

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 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.⁵ This differs from the state averages, where over 37% students are considered Economically Disadvantaged Students and 7.4% are English Learners.⁶

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." 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. The median household income is \$137,672. Over 81% of its adult residents age 25 and over have a bachelor's degree or higher. 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.

² [https://www.boarddocs.com/nj/pps/Board.nsf/files/AXWLAQ51A596/\\$file/Princeton%20Cranbury%20Fact%20Sheet%204-17-2018.pdf](https://www.boarddocs.com/nj/pps/Board.nsf/files/AXWLAQ51A596/$file/Princeton%20Cranbury%20Fact%20Sheet%204-17-2018.pdf)

³ <https://rc.doe.state.nj.us/district/detail/21/4255/demographics?lang=EN>

⁴ <https://rc.doe.state.nj.us/state/detail/demographics?lang=EN>

⁵ Id.

⁶ <https://rc.doe.state.nj.us/state/detail/demographics?lang=EN>

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.

EXECUTIVE SUMMARY ORGANIZATION

The executive summary of the PPS comprehensive special education program review is organized in a manner by which the strengths and opportunities of each section are first identified. Thereafter, a summary of the findings are provided within each section. At the end of the executive summary, actionable recommendations are provided.

II. SUMMARY OF STRENGTHS AND OPPORTUNITIES FOR IMPROVEMENT

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

In this section of the report, PCG discusses the pre-referral, referral, eligibility, and child find processes for special education services in both New Jersey and within Princeton Public Schools.

Strengths	Opportunities
<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 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.

Summary of Findings

- Inconsistent Intervention and Referral Services (I&RS).** In PPS, Intervention and Referral Services (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. 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. 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. Through interviews and focus groups it was also determined there are inconsistent I&RS practices throughout the district. Additionally, there are no I&RS standard operating procedures within PPS.
- Limited use of a 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. 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.

- **Use of Accelerated Intervention Services Outside of MTSS.** 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. 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. However, it operates outside of MTSS in a manner that is not consistent with a tiered support system and is redundant.
- **Limited Data Collection Tools for Interventions.** 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.
- **Disproportionate Representation of Racial Minorities Identified with Disabilities.** 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.⁷ 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.
- **Challenges Assessing English Learners Suspected of Having a Disability.** 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.
- **Staff Accountability in Supporting the Creation of Individualized Education Plans (IEPs).** 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, evidenced during file review focus groups conducted by PCG, 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. 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.

⁷ 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.

B. TEACHING, LEARNING, AND SPECIAL EDUCATION SUPPORT

In this section of the report, PCG discusses the teaching, learning, and supports for students receiving special education services in Princeton Public Schools.

Strengths	Opportunities
<ul style="list-style-type: none"> District has expanded its In Class Resource (ICR) programming 	<ul style="list-style-type: none"> 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.

Summary of Findings

- Strong Co-Teaching at Elementary Levels; Needs Strengthening at Middle and High School Levels.** 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.
- Use of Principles of Universal Design for Learning (UDL).** 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.”
- Use of Data to Support Paraprofessional Implementation and Fading.** 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 to Advanced Courses.** 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 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.

C. SOCIAL EMOTIONAL SUPPORT FOR STUDENTS WITH DISABILITIES

In this section of the report, PCG discusses the social emotional and behavioral supports for students with disabilities in Princeton Public Schools.

Strengths	Opportunities
<ul style="list-style-type: none">PPS' behaviorist plays an active role in the Functional Behavior Assessments Behavioral Interventions of students with disabilities	<ul style="list-style-type: none">PPS does not have a formalized tiered behavioral support structure for students with disabilities

Summary of Findings

- Use of Behaviorist, No Tiered System to Support Behavioral Needs of Students with Disabilities.** 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.

D. ORGANIZATION AND LEADERSHIP

In this section of the report, PCG discusses the organization and leadership that directly and indirectly support the Special Education Programming in Princeton Public Schools.

Strengths	Opportunities
<ul style="list-style-type: none"> Incoming leadership (Superintendent and permanent Assistant Superintendent for Curriculum and Instruction) have an important responsibility to direct and recalibrate general education initiatives that have a significant impact on special education referrals 	<ul style="list-style-type: none"> 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.

Summary of Findings

- Accountability.** 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 and 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.
- Chain of Command Difficult to Navigate.** 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, under the present structure, the Director cannot hold these staff accountable on a matter the Director is responsible for – the implementation and oversight of IEPs.
- No Special Education Standard Operating Procedures Manual.** 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. 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.
- Lack of Ownership from the Office of the Assistant Superintendent for Curriculum and Instruction on Key Initiatives That Support Struggling Learners and Referral for Special Education.** There has been a lack of clarity and accountability around I&RS, MTSS, and positive behavioral supports. All of these are general 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.

E. PARENT ENGAGEMENT

In this section of the report, PCG discusses engagement between the parents of children with disabilities and the teachers, administrators, and leaders of Princeton Public Schools.

Strengths	Opportunities
<ul style="list-style-type: none">• PPS has an engaged parent community; surveys indicate parents are satisfied with many aspects of their child's special education programming	<ul style="list-style-type: none">• 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

Summary of Findings

- **Availability of Parent Training.** 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.
- **Parent Satisfaction.** Parent survey data showed the majority of parents agree that teachers and school staff communicate effectively with them; central office staff communicate effectively with them; and that school staff respond to concerns within a reasonable time period. Areas of concern shared from parents included inconsistent practices; culture challenges with general education teachers; and a system of silos.
- **Culture and Climate of Shared Responsibility.** 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

F. BUDGET AND FINANCE

In this section of the report, PCG discusses how Princeton Public Schools compares to peer districts in New Jersey on key special education service expenditures.

Strengths	Opportunities
<ul style="list-style-type: none"> • According to district-provided data, PPS has kept special education instruction costs stable. 	<ul style="list-style-type: none"> • Thoroughly review the special education budget to assure that the public is seeing accurate data on the <i>New Jersey User Friendly Budgets</i> specifically related to special education expenditures.

Summary of Findings

- **Inconsistent Budget Reporting.** In PPS, the special education budget is managed by the Business Administrator. The Special Education Director works with the 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 PCG corrected numbers which are used for comparison in the executive summary and cited in the final report.
- **Comparison to Peer Districts.** 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; and Westfield, NJ. 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. 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' expenditures are in the middle among the peer districts reviewed. However, when conducting this analysis using corrected data provided by PPS, it is the highest. 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.
- **Budget Stability.** 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 over the past three years.

G. SPECIAL EDUCATION COMPLIANCE WITH STATE AND FEDERAL REGULATIONS

In this section of the report, PCG discusses compliance with state and federal regulations as well as due process complaints for students with disabilities in Princeton Public Schools.

Strengths	Opportunities
<ul style="list-style-type: none"> Aside from Indicator 3, in areas where PPS does not meet state targets, it is often close to the state target. 	<ul style="list-style-type: none"> PPS is not meeting any of the Indicator 3 Performance metrics; however, its proficiency rate in HS Math is 16%

Summary of Findings

- Federal Indicators.** The United States Department of Education (USED), Office of Special Education Programs (OSEP) has established SPP/APR requirements that include 17 indicators. 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. Indicator 3 is the proficiency rate for children with IEPs against grade level standards and alternate achievement standards. Using lag data from the 2017-18 school year, the most concerning area of this indicator for PPS is high school math, where the proficiency rate was only 16%. The district indicates this has since improved because of changes it has made in its elementary math curriculum.
- No Founded Office of Civil Rights (OCR) 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.
- No Commissioner Complaints.** 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 Hearings.** 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.

III. RECOMMENDATIONS

In this section of the report, PCG offers a series of actionable recommendations for Princeton Public Schools to undertake. The recommendations are not in rank order and it is expected that Princeton Public Schools will engage in an action planning process to prioritize recommendations it will undertake, when it will undertake them, parties responsible, timelines, and expected outcomes.

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

Intervention and Referral Services (I&RS)	<ul style="list-style-type: none"> ✓ 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	<ul style="list-style-type: none"> ✓ 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	<ul style="list-style-type: none"> ✓ 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)	<ul style="list-style-type: none"> ✓ 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	<ul style="list-style-type: none"> ✓ Infuse a Positive Behavior Support system into the district's MTSS.
English Learners with a Suspected Disability	<ul style="list-style-type: none"> ✓ 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	<ul style="list-style-type: none"> ✓ 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	<ul style="list-style-type: none"> ✓ Engage case managers in intensive, ongoing training on IEP writing with specific focus on IEP goal writing and SMART goals, and quantitative progress

	<ul style="list-style-type: none"> 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.
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B. TEACHING, LEARNING, AND SPECIAL EDUCATION SUPPORT

Achievement of Students with Disabilities	<ul style="list-style-type: none"> ✓ Further study NJSLA drop in grade 3 mathematics for students with disabilities who were meeting exceeding expectations.
Co-teaching	<ul style="list-style-type: none"> ✓ 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	<ul style="list-style-type: none"> ✓ 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	<ul style="list-style-type: none"> ✓ 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	<ul style="list-style-type: none"> ✓ 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.

C. SOCIAL EMOTIONAL SUPPORT FOR STUDENTS WITH DISABILITIES

Specialized Behavior Support for Students with Disabilities	<ul style="list-style-type: none"> ✓ Formalize a tiered positive behavior support model for students with disabilities, districtwide.
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D. ORGANIZATION AND LEADERSHIP

Addressing Key Challenges that Impact Special Education but Are Outside of	<ul style="list-style-type: none"> ✓ Urgently address –at the Superintendent, Assistant Superintendent for Curriculum
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Department Purview	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.

E. 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.
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F. 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.
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G. SPECIAL EDUCATION COMPLIANCE WITH STATE AND FEDERAL REGULATIONS

None	
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