Special Education Review

Greenwich Public Schools

June 2021

Authors:

Matthew Korobkin
Dr. Jennifer Meller
Dr. Jerry Petroff
Matthew Scott

PUBLIC CONSULTING GROUP

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Acknowledgements

The PCG team thanks the many individuals who contributed to this review of GPS's services for students with disabilities. Their efforts were critical to our ability to obtain a broad and detailed understanding of the system so that we could present the best possible proposals for improving special education services for GPS's students. This review would not have been possible without the support of the GPS Board of Education, Superintendent, and Steering Committee. We thank them for their willingness to devote the time and attention needed to ensure a high-quality and inclusive review. PCG also thanks the many GPS staff members with whom we met. Their commitment to the work they do was evident through their comments and earnest feedback. They work passionately to support students with disabilities and those requiring intervention supports and ensure GPS serves these students in the best possible manner.

Public Consulting Group

TABLE OF CONTENTS

LIST OF EXHIBITS

LIST OF TABLES

I. INTRODUCTION

Purpose of the Study

In October 2020, through a competitive bidding process, Greenwich Public Schools (GPS) selected Public Consulting Group (PCG) to conduct an independent review of its special education services. This report describes the current state of the special education program in GPS and is designed to guide the District toward continuous improvement. It builds upon previous special education evaluations in GPS and focuses on the current, overall effectiveness of this program as well as the progress made toward recommendations from prior evaluations.

The study examined the following guiding questions:

1. How is the District's continuum of services organized to support a Free and Appropriate Education (FAPE), and to what extent is GPS meeting compliance and data collection requirements?
2. How are funds budgeted, and what are the major cost drivers? Does GPS allocate resources in a way that facilitates maximum return on District investment?
3. To what extent does GPS organize and utilize its human capital resources to provide adequate services for students with disabilities to support and maximize student learning outcomes?
4. To what extent does GPS employ inclusive practices and implement instructional practices that focus on improving academic, functional, and post-secondary outcomes for students with disabilities?
5. How does GPS support the unique learning needs of struggling students through its tiered system of support?

The recommendations in this report focus on priority areas that emerged from the data collection and include action steps to bolster overall planning in support of increased access for students with disabilities to high-quality instructional programming.

PCG worked in conjunction with an appointed Steering Committee to manage this engagement. The Steering Committee consisted of the Superintendent, two Board of Education Members, and two parent representatives. Two other GPS staff members, appointed by the Superintendent, provided logistical support and assistance with gathering requested data and documents. In adherence with GPS's request for an independent review, at no point in time did PCG share preliminary findings, analyzed data, or report drafts with GPS staff members, Board Members, Steering Committee Members, or any others outside of those employed by PCG.

Methodology

Over the course of the 2020-21 school year, PCG conducted a mixed-methods study of the special education program in GPS. The findings and recommendations related to programs, policies, and practices resulted from a comprehensive analysis of several data sources. Sources included **1) Data and Document Analysis, 2) Focus Groups and Interviews, 3) Student File Review Focus Groups, 4) Classroom Visits, and 5) Staff and Parent Surveys.** These components drew from **Research and Practice Literature** to inform the findings and recommendations. PCG used publicly available achievement and financial information to compare key GPS statistics against local district, state, and national data. 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 GPS's special education programs and services.

This engagement occurred during the COVID-19 pandemic when a combination of intermittent hybrid and in-person learning occurred. Despite the complexities of conducting this review virtually, GPS was committed to the process and worked with PCG to ensure data collection methods were reliable and appropriate given the remote context. The GPS leadership should be recognized for their response to this crisis, as well as maintaining ongoing collaborative engagement with PCG for the purposes of continuing this review.

Details of each data source are included below.

Data and Document Analysis

Population Trends, Programs, and Achievement and Outcomes Analysis

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 general education peers.

Staffing Analysis

PCG team members have compiled special education staffing ratios from approximately 70 school districts (very large to very small) nationwide. The District's staffing ratios were incorporated into these data to consider GPS staffing information in a broader context. Staffing comparison data have been used to evaluate the extent to which staff roles, responsibilities, and training are aligned to GPS's expectations.

Document Review

PCG reviewed more than 50 documents for information related to district and school structures, programs, policies, and practices. Documents reviewed were in the following general categories:

- Organizational structure, staffing, and resource allocation
- Description of academic programs, services, interventions, and activities
- Instruction and professional development
- District procedures and guides, including improvement plans
- Compliance and due process complaints
- Fiscal information

Focus Groups

From October 2020 through April 2021, PCG conducted two sets of focus groups: 1) organizational focus groups/interviews and 2) student file review focus groups. Within this report, no focus group or interview participants are personally referred to, although position titles are referenced in some cases when necessary for contextual reasons.

Organizational Focus Groups and Interviews

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. These focus groups occurred in October 2020 and November 2020 and included a variety of central office staff, school-based staff, and family participants. PCG worked closely with the Steering Committee to determine the best outreach and communication methods for focus group and interview participation.

Focus groups generally consisted of 10-12 participants, while interviews ranged from 1-3 participants. Except in rare circumstances, supervisors did not participate in the same focus group or interview sessions with their staff members to give all staff an opportunity to speak candidly and honestly. PCG provided a sample schedule and a list of positions required to participate. In total, PCG facilitated 65 focus groups, with more than 350 stakeholders participating.

Student File Review Focus Groups

From December 2020 through April 2021, PCG conducted student-centered file review focus groups that allowed for further discussion on school-based practices and included a review of a variety of student documents, specifically eligibility documentation, Individualized Education Plans (IEPs), and student progress reports. Through this records review, PCG focused on several topics related to special education management, student identification, programs and services, curriculum and instruction, staffing, and parent engagement, while addressing specific process questions about the development of IEPs, their implementation, and documentation. Student records were selected at random by PCG and included a wide cross-section of schools, ages, gender, and disability categories. GPS staff provided access to the relevant documents associated with the selected students, including the most recent evaluation, IEP, and progress report, and provided copies for discussion via the District's internal email system. An average of five student records were discussed during each focus group session.

Participants included special education teachers and individuals who both knew and did not know the student. Each group consisted of approximately four to six participants. To ensure adequate participation in each group, the Superintendent's Office worked in conjunction with school-based leadership to select special education staff for participation. Focus groups took place after school to allow for maximum attendee participation and minimal disruption to teaching. In total, PCG facilitated 21 student file review focus groups, with more than 90 stakeholders participating.

Classroom Visits

In January 2021, PCG conducted 29 classroom visits across 16 schools. 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 had been 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 and inclusive practices and supports. While not all elements of quality special education services can be observed virtually, there are core instructional practices, supplementary aids and services, and approaches to personalized instruction that are evident within an in-person socially and socially distanced setting as well as a hybrid classroom model. These included foundational attributes to learning environments such as Universal Design for Learning and differentiated instruction. PCG's classroom visits sought evidence of the presence and implementation of:

1. Specially Designed Instruction;
2. Elements of Universal Design for Learning;
3. Student Accommodations;
4. Approaches to Co-Teaching and Collaborative Consultation Teaching; and
5. Differentiation and Inclusion.

PCG visited the following classrooms:

Classroom Level	Type of Classroom	Number[1]
Early Childhood Classrooms (Preschool – K)	Inclusive Classrooms	*
Early Childhood Classrooms (Preschool – K)	Combination Classrooms	*
Early Childhood Classrooms (Preschool – K)	Self-Contained	*
Elementary (1st – 5th)	Inclusive	*
Elementary (1st – 5th)	Resource (Supplemental & Replacement) or Combination	*

[1] PCG did not list the number of specific classrooms within each category because it did not want to potentially reveal personally identifiable information about teachers and/or students within each setting.

Elementary (1st – 5th)	Self-Contained	*
Middle School (6th – 8th)	Inclusive	*
Middle School (6th – 8th)	Resource (Supplemental & Replacement) or Combination	*
Middle School (6th – 8th)	Self-Contained	*
High School (9th – 12th)	Inclusive	*
High School (9th – 12th)	Resource (Supplemental & Replacement) & Combination	*
High School (9th – 12th + ages 18-21)	Self-Contained	*
	TOTAL	29

The resulting data from all classroom visits are categorized and aggregated to inform impressions of the special education district-wide system and indicate areas in which professional development in special education practices may be considered. Using aggregated data across classroom level and type adheres to the agreement to not identify specific schools or staff. Furthermore, these data are used primarily as another set of data for overall triangulation.

To select those designated for visits, PCG requested a list of classrooms in which there were students with IEPs and the level, subject area, and placement designation. The intent was to ensure that all placement settings were represented. PCG used a combination of random and purposeful sampling to assure that there was an overall representation of classrooms across the District.[2] Two teams of two PCG staff (a total of four) participated in each visit, so there would be two evaluators at each classroom visit. In addition, a fifth PCG evaluator was engaged to visit a sample of the classrooms for the purposes of Inter-Observer Agreement.[3] Visits occurred across a two-week period that included a pre-visit discussion, a one-hour visitation, and a post-visit reflection with each teacher.

Staff and Parent Surveys

An online survey process was implemented to collect data on stakeholder perceptions of the quality and effectiveness of GPS's special education services. PCG collaborated with the Steering Committee to vet survey items and disseminate two surveys: one to GPS staff, and one to GPS parents of students with IEPs.

Parents and staff who chose not to participate in the surveys were also invited to anonymously submit feedback to PCG. PCG received a total of 30 emails regarding GPS special education programming; all emails were from parents.

Survey Items

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 special needs were evident in GPS. To the extent possible, staff and parents were asked parallel questions to gauge how perceptions about the same topic were the same or differed.

The Steering Committee reviewed the survey items to verify their relevance and to add items where appropriate. The survey incorporated five-point rating scales, yes/no questions, and open-ended text areas.

[2] This is often characterized as Heterogeneity Samples or Maximum Variation Samples.
[3] A process of assessing inter-observer agreement to assure that (1) there is some level of consistency; (2) there are no biases by any of the observers; and (3) the practices to be documented were similarly understood by observers. Ten classrooms were randomly chosen during one week of the classroom visits so that a third PCG Evaluator could be available to document the visit. The observations were then compared to assure that there was a general level of agreement of 70 percent or more.

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).

Survey Process

The Steering Committee worked collaboratively with the PCG team to facilitate an electronic survey process that would result in the highest possible rate of return. An announcement notice was drafted by GPS's communication department and included in the weekly Family Note to all parents along with the weekly Superintendent's Update. The staff survey link was communicated via email. The parent survey was also translated into Spanish. All potential participants were informed of the purpose of the survey and were provided with instructions for accessing the survey online.

The staff survey was administered on December 4, 2020 and was open for four weeks. All educators, including general education teachers, special education teachers, paraprofessionals, related service providers, and building administrators, received a link to the electronic survey. Reminder emails were sent to all GPS educators. A total of 588 GPS staff members, out of the 1,525 who received the survey, completed it online, representing a response rate of 38.6 percent. Of those staff members, 99 were special education teachers; 314 were general education teachers; 54 were paraprofessionals, and 39 were related service providers. Approximately 79 percent of all special education teachers participated in the survey, and approximately 49 percent of all general education teachers participated in the survey.

A total of 476 parents completed the survey. Reminders were posted in the Superintendent's weekly email to parents.

Survey Analysis

Selected survey responses appear within the main body of the report to support findings from specific topics.

Study Limitations

While PCG adjusted the project methodology to account for the impact of the COVID-19 pandemic, the study had the following limitations:

1. The circumstances presented, specifically social distancing and/or hybrid and online instruction by the COVID-19 pandemic inevitably influenced instruction. Teachers' common instructional tools and approaches were affected, as students were not educated in traditional learning environments. This must be recognized as having some influence on the overall school experience. With this consideration, it remains PCG's position that the majority of core practices in special education should be present. Another limitation was the effects on the process due to the complexity of scheduling and occasional technology challenges.
2. In typical reviews of this nature, the Special Education Director, often in conjunction with the Chief Academic Officer or Deputy Superintendent, generally serves as the project lead. This arrangement allows for in-depth discussions about current practices throughout the course of the project and access to all relevant special education data and documentation. This study, by contrast, was managed by the GPS Superintendent, Executive Assistant, Research Manager, and a Steering Committee with Board of Education members and parent representatives. As such, there are some places, albeit a small number, that information specific to special education documentation was requested and not able to be provided.
3. In the spirit of the independence requested, this report has not been reviewed by GPS staff or Steering Committee Members, and as such, there could be places where PCG's context was limited. Data contained within this report represent the best of PCG's understanding of GPS's special education program based on our data collection and analysis protocols.

4. Data collection for this report was conducted during the 2020-21 school year. This report represents a specific point in time.

PCG's Foundational Approach

PCG approaches its work with state, county, and district organizations as a thought partner. That is, we act as an outside agent, with an objective perspective, who works alongside educational entities to recognize what is working, identify challenges and provide recommendations for improvement. We follow a mixed method Collaborative Program Evaluation model that is systematic, based upon qualitative and quantitative research methods, that produces credible and valid data to proactively inform program implementation, determine gaps, and drive 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 improving student outcomes in schools and districts is driven by the U.S. Department of Education's Results Driven Accountability (RDA) structure and is rooted in our Special Education Effectiveness Domains framework (included below).

Results Driven Accountability

The Individuals with Disabilities Education Act (IDEA) is a federal law that makes available a free appropriate public education (FAPE) to eligible children with disabilities throughout the nation and ensures special education and related services are provided to those children. The IDEA governs how states and public agencies provide early intervention, special education, and related services to more than 6.5 million eligible infants, toddlers, children, and youth with disabilities and requires that each public school provide services to eligible students in the least restrictive environment (LRE) and in accordance with each student's IEP.

In the law, Congress states:

> *Disability is a natural part of the human experience and in no way diminishes the right of individuals to participate in or contribute to society. Improving educational results for children with disabilities is an essential element of our national policy of ensuring equality of opportunity, full participation, independent living, and economic self-sufficiency for individuals with disabilities.*[4]

One purpose of IDEA is to assess and ensure the effectiveness of efforts to educate children with disabilities. This is done through accountability measures established by the federal Office of Special Education Programs (OSEP), state special education agencies, and, at times, special education case law.

While compliance indicators remain important, under the RDA framework, 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 was 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.[5] This shift is having a great impact in guiding the priorities of special education departments nationwide. Districts across the country need to raise the level of and access to rigor in the classroom and generate a culture of academic optimism.[6]

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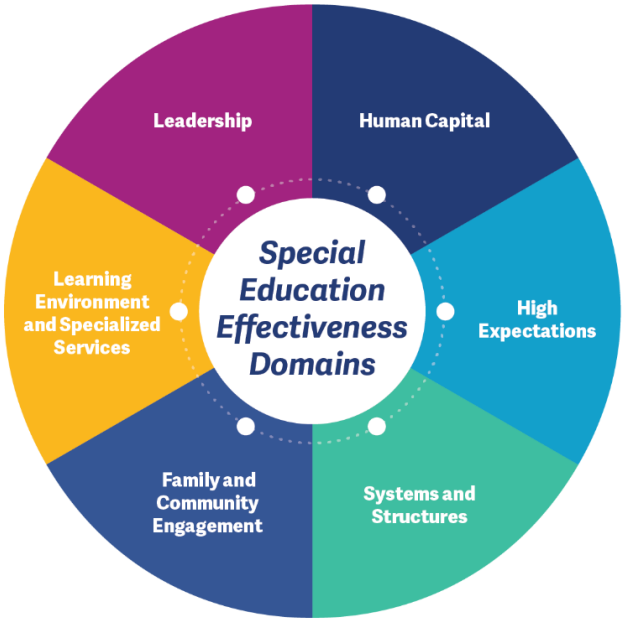
[4] https://sites.ed.gov/idea/about-idea/
[5] April 5, 2012, RDA Summary, U.S. Department of Education. www2.ed.gov/about/offices/list/osers/osep/rdasummary.doc
[6] Hoy, W. K., Tarter, C. J., & Woolfolk Hoy, A. (2006). Academic optimism of schools: A force for student achievement. Working Paper. The Ohio State University. http://www.waynekhoy.com/school-academic-optimism/

These issues became even more significant with the March 22, 2017 U.S. Supreme Court decision in *Endrew F. v. Douglas County School District*.[7] 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 each student to make academic and functional progress and advance from grade to grade. Progress for students with disabilities, including those receiving instruction based on alternate academic achievement standards, must be appropriate in light of their unique circumstances. Furthermore, yearly progress must be more substantial than the "merely more than de minimis" standards that had been used by some lower courts. The Court made it clear that IDEA demands more. In *Endrew*, the Supreme Court reached a balance between the standard established by the 10th Circuit and other circuits (more than de minimis) and the higher standard promoted by Endrew's parents (goal of providing students with disabilities opportunities to achieve academic success, attain self-sufficiency, and contribute to society that are substantially equal to the opportunities afforded children without disabilities). The *Endrew* decision's most significant impact in the classroom can be seen in: (1) the design and development of rigorous IEPs; (2) the implementation of students' IEPs with fidelity; and (3) increased progress monitoring of IEP goals to assess learning.

Special Education Effectiveness Domains

Building on extensive research and our collective experience and expertise serving school districts and state departments of education nationwide, PCG has developed this Special Education Effectiveness Framework to assist school districts in catalyzing conversations about, and reviewing and improving the quality of, their special education programs.[8] It is designed to provide district leaders with a set of practices to strengthen special education services and supports, to highlight the multidisciplinary, integrated nature of systemic improvement, and to clearly establish a pathway for districts to move toward realizing both compliance and results. An intentional focus on improving outcomes for students with disabilities leads to improved outcomes for ALL students.



When implemented with a systems-thinking approach, the six domains of our Special Education Effectiveness Framework help superintendents and other district leaders improve educational and functional outcomes for students with disabilities.

The recommendations we provide in this report are organized around these domains and are oriented toward extending GPS's focus on outcomes for students with disabilities.

Terminology

There are several terms used throughout this report that require definition and clarification within the GPS context.

[7] Supreme Court of the United States. Retrieved from https://www.supremecourt.gov/opinions/16pdf/15-827_0pm1.pdf
[8] https://publicconsultinggroup.com/media/3347/special-education-effectiveness-framework_policy-paper.pdf

Gender data. Current data collection at the GPS and at the federal level is binary, with comparative data available for males and females only. As such, these categories are used throughout this report.

Emotional disability. The federal data reporting category of "emotional disturbance" is also reflected in Connecticut regulations. PCG uses the less stigmatizing term "emotional disability" in charts and analyses contained throughout this report.

Nondisabled peers. This term is generally used in data tables where the original data source uses this nomenclature. At times, the term "students without disabilities" is also used.

Paraeducators. The terms paraeducator, paraprofessional, instructional assistant, and professional assistant are used throughout the report to describe aides who support the academic and/or behavioral needs of students with disabilities. These terms are interchangeable.

Parents. In the context of this report, a parent is defined as natural or adoptive parents of a child, a guardian, a parent acting in the place of a parent (such as a grandparent or stepparent with whom the child lives, or a person who is legally responsible for the child's welfare) or a surrogate parent. The term "parent" is inclusive of families as well.

Pupil Personnel Services. Special education refers to the provision of services under the IDEA and the receipt of special education/related services through an IEP. The National Center on Disability and Journalism notes that the term "special education" is widely used when referring to public school programs, though some organizations have used terms such as "exceptional student services" or "specialized instruction."[9] GPS uses the term special education, though it is widely acknowledged that these services are managed in the Pupil Personnel Services Office. At times this office may be referred to as the Special Education Office.

Speech therapists. Throughout the report, speech therapists are also referred to as speech language pathologists.

Students receiving special education services. References are made to students receiving special education services. They will also be referred to as students with IEPs or students with disabilities (SWDs). The terms are intended to be interchangeable. For this report, these references do not include students with disabilities who have 504 Plans.

Students with disabilities. In exhibits throughout the report, students with disabilities are also referred to as SWD.

[9] https://ncdj.org/style-guide/#S

II. DISTRICT CONTEXT AND DEMOGRAPHICS

Strengths	Opportunities for Improvement
• **High Performing.** GPS has a reputation for having high-quality schools and programs. • **Organizational Support**. The Board of Education and District leadership are committed to changing special education practices. • **Results Driven Accountability (RDA) Determination.** GPS received an RDA determination of "Meets Requirements" from the Connecticut Department of Education.	• **Common Deficiencies.** Four deficiencies - Planning and Placement Team (PPT) Process, Communications and Engagement, Continuum of Services, and Professional Development - were identified in prior special education reports as areas in need of improvement. • **Identification Practices.** Hispanic and Black/African American students were more likely to be identified with specific disabilities, and a greater number of students with IEPs were economically disadvantaged compared to the general GPS population.

This section provides an overview of the current District context, a synthesis of prior special education reviews, and demographics related to the population of students receiving special education services.

District Context

Greenwich is a town in southwestern Fairfield County, Connecticut, United States. As of the 2010 census, the town had a total population of 61,198, with a census-estimated increase to 62,840 in 2019.[10] The largest town on Connecticut's "Gold Coast," Greenwich is home to many hedge funds and other financial service firms, given its proximity to New York City. Its school district, Greenwich Public Schools (GPS), educates approximately 9,000 students from kindergarten through age 21.[11] The District serves students in 15 schools: 11 neighborhood elementary schools (grades K-5), three middle schools (grades 6-8), and one high school (grades 9-12+). Students are assigned to elementary and middle schools based on residential attendance areas. Four of the elementary schools and one middle school also serve as magnet schools, offering programmatic choice for families.[12] A tuition and lottery-based preschool program, inclusive of students with disabilities, is also offered for residents and employees of the Town of Greenwich. Additionally, GPS operates an alternative high school program, Windrose, for students requiring a smaller learning environment, more structure and support, and a path toward graduation when they are over-age and under-credit.[13] The student body is largely white (60.9 percent), with students primarily coming from economically advantaged backgrounds. The diversity in the community should not be overlooked, though. Hispanic/Latino students represent 22.3 percent of the student population, Asian students 8.7 percent, multiracial students 5.6 percent, and Black students 2.3 percent.[14] English learners (EL) represent 4.0 percent of the student population, and 12.9 percent of students receive special education services.[15] Nearly

[10] https://www.census.gov/quickfacts/greenwichtownfairfieldcountyconnecticut

[11] http://edsight.ct.gov/SASStoredProcess/guest?_program=/CTDOE/EdSight/Release/Reporting/Public/Reports/StoredProcesses/ConnecticutReportCard&_district=Greenwich+School+District&_school=+&_select=Submit

[12] Hamilton Avenue School, The International School at Dundee, Julian Curtiss School, New Lebanon School, and Western Middle School

[13] https://www.greenwichschools.org/greenwich-high-school/academics/teaching-learning/windrose

[14] http://edsight.ct.gov/SASStoredProcess/guest?_program=/CTDOE/EdSight/Release/Reporting/Public/Reports/StoredProcesses/ConnecticutReportCard&_district=Greenwich+School+District&_school=+&_select=Submit

[15] These data are from the GPS website. Figures in the report differ, depending on various factors.

22 percent of enrolled students are economically disadvantaged. Honoring the racial, economic, academic, and neurological diversity of its students is critical for GPS's future.

GPS's reputation is that of a high-performing district, with several award-winning schools and accolades for its programming. Its culture is one built on the notion of continuous improvement and high expectations. As evidenced by the multiple program reviews that have occurred in special education and in other programmatic areas, GPS is accustomed to analysis and reflection. Resulting action and changes in practice, however, have been slow to come. The Planning and Placement Team (PPT) process, communications and engagement, the continuum of services, and professional development have been identified as areas of concern in all external special education reports dating back to 1997. The Greenwich parent community is active and vocal, providing significant input on what they believe the direction of special education in GPS should be. Many parents shared with us their hope that this report would be upfront and honest, even if the areas of improvement outweighed the strengths. There is a sense of cautious optimism in the parent and school communities that the recommendations in this report will be enacted immediately and with fidelity. Some remained conflicted about GPS's ability to change, and others recognized the heavy lift that is likely ahead. As one stakeholder shared, "This is an 'open the aperture' report. It won't give us easy answers but will guide us on how to make decisions about special education in the future."

GPS has the opportunity to change its current trajectory, build a world-class special education program, facilitate trusting relationships with parents, and offer supports and services that enable students with disabilities to excel academically, socially, and emotionally. The current District leadership and Board of Education have publicly expressed commitment to making the changes necessary. The start of a new interim Chief of Pupil Personnel Services, coupled with a focus on improving the foundation of intervention supports through a Multi-Tiered System of Supports (MTSS) framework, reflects the beginning of necessary shifts. With a sense of urgency and an unrelenting commitment to enacting the recommendations in this report, PCG believes GPS can achieve the high-quality programming for ALL students, especially those with disabilities, that we know it desires. Initiating this kind of change requires attention, a strong vision from the Superintendent and Board of Education that is enacted by senior leadership staff, an appropriate allocation of resources, mandated professional learning, and clear, non-negotiable accountability measures. PCG strongly encourages GPS to develop a bold, creative, and transparent implementation plan to which it will hold itself accountable, and that is informed by input from a wide range of community stakeholders. Doing so will position GPS for its upward trajectory for years to come.

Synthesis of Prior Special Education Reports

Over the past 24 years, GPS has engaged five different consulting firms to conduct special education program reviews prior to this review conducted by PCG. They include the following:[16]

Date of Study	Title and Alias Name of Study	Firm That Conducted Study and Authors
October 2020	*Task Force and Devising Seminar Process Report for Greenwich School District* (a.k.a. "the Key2Ed Report")	**Key2Ed, Inc.** Joyce H Little, Ed.D. Casie Velasquez, M.Ed.
September 2014	*Focused Review of Tuition and Settlement Costs: Special Education Due Process* (a.k.a. "the DeFrancis Report")	**ReImagine Consulting LLC** Teresa C. DeFrancis

[16] PCG included both the formal names of these reports as well as how they are referred to, locally, among members of the GPS community.

June 2010	*Summary Report of Selected Special Education Interviews* (a.k.a. "the Oswego Report")	**Oswego State University** Dr. Winsome Gregory Dr. Jonathan Ross Dr. Ardrea Lambeth Smith Linda Suarez
November 2005	*Review of the Pupil Personnel and Special Education Support and Services for Greenwich Public Schools* (a.k.a. "the MGT Report")	**MGT of America, Inc.**
November 1997	*A Study of the Effectiveness, Efficiency, and Management of the Special Education Program in the Greenwich, Connecticut Public Schools* (a.k.a. "the Gold Report")	**Education Leadership Services, Inc.** Richard Dempsey Claire Gold Lois Libby Kate McGraw

Through PCG's review of these studies, there were four notable deficiencies identified in almost all of them: (1) PPT process; (2) communications and engagement; (3) continuum of services; and (4) professional development. PCG reviewed all five reports and provided a sampling remarks from each of the reports that relate to these categories.

PPT Process

Key2Ed Report

- "Inconsistencies among schools regarding the PPT process, and the knowledge of administration regarding special education."
- "Lack of parent understanding of PPT process and the IEP document."

Oswego Report

- "The [PPT] meetings were reported by parents as not user friendly or client centered."
- "In some cases, parents misunderstood the purpose of the preliminary IEP they received in anticipation of the PPT meeting."

Gold Report

- "… the PPT process was found to be formal, long, the professional teams large, with considerable use of educational jargon…a special education staff member described the typical PPTs as "not user friendly.'"

Communications and Engagement

Key2Ed Report

- "Lack of collaboration."
- "Communication—miscommunication, lack of communication, unclear and incomplete communication, from school staff, from parents, and administration, between, among, and with each other, oral and written."
- "There appeared to be a visceral sense among many interviewees they have been treated badly and unfairly and most parties (parents, school staff, and administration) felt that trusting individuals on the other side was a major challenge."

- "Many parents reported that they do not understand and/or are confused regarding many aspects of general and special education."

Oswego Report

- "There was a feeling among parents that there was not a uniform commitment among school people to the education of students with disabilities."
- "The administration needs to build a foundation based on mutual trust and understanding."
- "Administrators must be careful listeners and provide parents with a sense that they indeed care about their child's education."
- "Administrators and faculty should develop an attitude at all schools that welcomes students with disabilities."
- "The [Special Education] department needs to improve communication with parents."

DeFrancis Report

- "Develop a Parent Survey for parents involved in disputes, whether they go to due process or not, asking what the District could have done to resolve the dispute earlier in the process."

MGT Report

- "Modify the special education parent survey responses and establish goals to address parental concerns."

Gold Report

- "The school district's special education table of organization has had a major flaw – the clarity in the line of communication between the building unit and the central office."

Continuum of Services

Key2Ed Report

- "Limited and/or lack of self-contained programs for children with autism."
- "Lack of addressing sensory and social skills issues for students with autism."
- "Meeting specific student needs re: timing/needs/schedule"
- "The staffing model for special education classes and services needs to be re-evaluated, with the recommendation from the Task Force to hire additional special education personnel."

Oswego Report

- "The primary program concern expressed by these parents was that there is a lack of what they refer to as a continuum of services."
- "The full inclusion model is not appropriate for all students and not consistent with the principles of providing them the least restrictive and effective learning environment."
- "General education teachers feel overwhelmed in dealing with special education issues beyond their capabilities and, therefore, lack commitment to students with disabilities. Some general education teachers believe that students with disabilities are not their responsibility and should not be in their classes."
- "There are too few related specialists on staff to work with students with disabilities."

- "The District needs to understand that large blocks of time in general education classes may not be suitable for all students with disabilities and that outplacement may be a viable option for some."

MGT Report

- "Expand the collaborative teaching model to higher level academic classes at Greenwich High School."
- "Integrate learning strategies and differentiated instruction into the general education curriculum."
- "Develop clear criteria to assist PPTs in making decisions about out of district placements."

Gold Report

- "The Greenwich Public Schools appear to be meeting the letter of the regulations regarding inclusion but the spirit of the regulations is lacking."

Professional Development

Key2Ed Report

- "Lack of training for those working with kids with autism."
- "Many parents feel that District teachers and staff need training/professional development regarding instructional strategies, and also on staff and teachers' responsibilities and obligations in serving students with special needs."
- "Many parents and also staff reported that many assistant principals lack knowledge regarding the PPT meeting process, and also the IEP document…"

Oswego Report

- "There are many general education teachers who need specialized training and support."
- "General education teachers need increased training and accountability on working with students with disabilities."
- "PPT Chairpersons should receive ongoing supervision and trainings in special education laws, regulations, District programs and services, dispute resolution, and improved communication skills is essential."
- "There must be regular professional staff development for all, including paraprofessionals."

MGT Report

- "Develop common time for special education and general education teachers to allow appropriate consultation and collaborative planning for students with disabilities."
- "Provide staff development for school administrators regarding effective instructional leadership."
- "Offer staff development regarding differentiated instruction and learning strategies to teachers and administrators."
- "Create staff development procedures that include collaborative planning, teaming, and time management among general and special education teachers and staff, systematic reading instruction, differentiated instruction, and learning strategies."

Gold Report

- "Staff development tends to be a potpourri of various requests from various administrators and does not appear to be filtered for priority."

- "Extensive staff development work needs to focus on ways for regular classroom teachers to modify their teaching strategies, use alternative texts, and explore new ways through which to develop a variety of practices through which students can demonstrate mastery."

Overview of GPS's Special Education Demographics

To meet the general supervision requirements under the IDEA, OSEP has established State Performance Plan (SPP) requirements and 17 indicators to monitor each state. While compliance indicators must have a federally required target of 100 percent, states develop annual targets for each performance indicator and monitor outcomes for each Local Education Agency (LEA). Compliance indicators are listed further below. Each year, states must publicly report state and LEA outcomes for each SPP indicator and associated targets.

OSEP has been criticized in past years that the analysis of the special education SPP indicators focused on compliance with no regard to performance outcomes. As a result, in 2013 the Department announced its intention to change this practice and to include participation in statewide assessments, reading and math proficiency results on the National Assessment of Educational Progress (NAEP), and graduation and dropout rates along with compliance results as the basis of the new RDA structure. The intent of RDA is to strike a balance between the focus on improved results and functional outcomes for students with disabilities while still adhering to the compliance requirements of IDEA. RDA is designed to be transparent and understandable and to drive improvement in the academic and functional achievement of students with IEPs.

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

The SPP indicator data collected takes on additional importance with OSEP's move to the RDA framework, as there are points associated with both a "Part B Compliance Matrix" and a "Part B Results Driven Accountability Matrix."

The following are compliance indicators and have a 100 percent minimum target:

Indicator 4b. Severely discrepant out-of-school suspensions by race/ethnicity but associated with compliant IDEA practices

Indicator 9. Disproportionate of all students with IEPs based on race/ethnicity but associated with compliant IDEA practices

Indicator 10. Disproportionate representation of students based on race/ethnicity by six disability categories but associated with compliant IDEA practices

Indicator 11. Timely initial eligibility evaluations

Indicator 12. Timely Part C (students from birth to 2 years) to Part B (students 3 to 21 years of age) transition

Indicator 13. Secondary transition goals and services documented in IEPs

States are required to include the SPP performance indicators below in their RDA framework. In addition, states may choose to include other performance indicators as part of their state accountability framework. Each state's framework must include and establish a target for each of the following SPP areas:

- **Indicator 1.** Graduation rate
- **Indicator 2.** Dropout rate
- **Indicator 3.** Statewide assessment participation rate

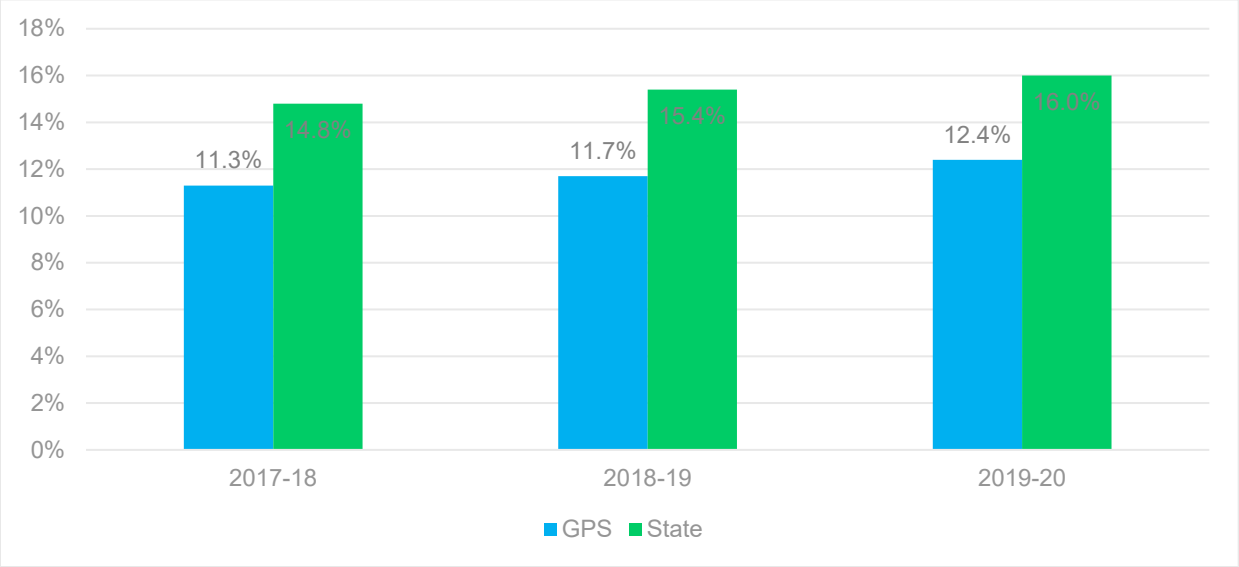
For the 2018-19 school year, GPS received an RDA determination of "Meets Requirements," and exceeded the state average of 51.5 percent and state target of 51.1 percent for the State Identified Measurable Result (SIMR) of Grade 3 English Language Arts (ELA) performance for students with disabilities. The District's SIMR score was 59.4 percent.

Additional SPP data for GPS is integrated into other sections of this report. The section below details the demographics of students with IEPs in GPS.[17]

Overall Incidence Rates

Between 2017-2020, the percent of students receiving special education services has increased from 11.3 percent (2017-18) to 12.4 percent (2019-20) and varied between a high of 17.5 percent in 2018-19 and a low of 16.4 percent in 2019-20.[18] Over these three years, the rates trended below state averages.

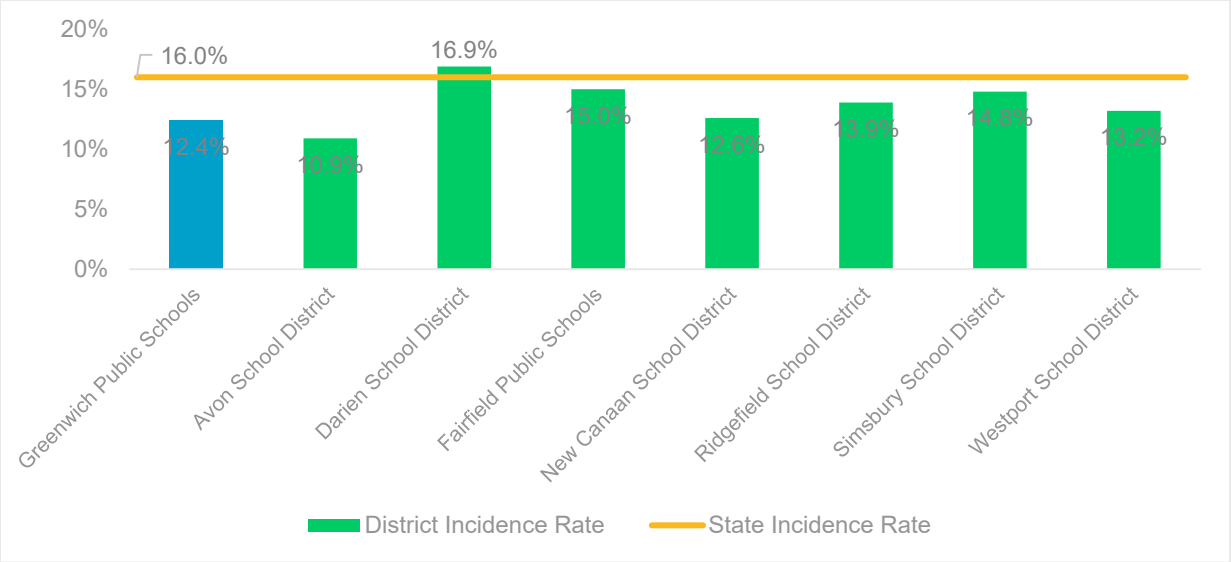
Exhibit 1. Percent of GPS Students with IEPs Compared to State Incidence Rates 2017-18 to 2019-20



Compared to seven similar districts in the state, GPS's incidence rate of 12.4 percent was lower than six districts. Avon School District had the lowest incidence rate (10.9 percent) of the comparable districts.

[17] Some exhibits are labeled K-12 and others are ages 6-21. This is due to how the data are presented in other publicly available sources, such as national data.
[18] District and State data obtained from EdSight. See: http://edsight.ct.gov/SASPortal/main.do

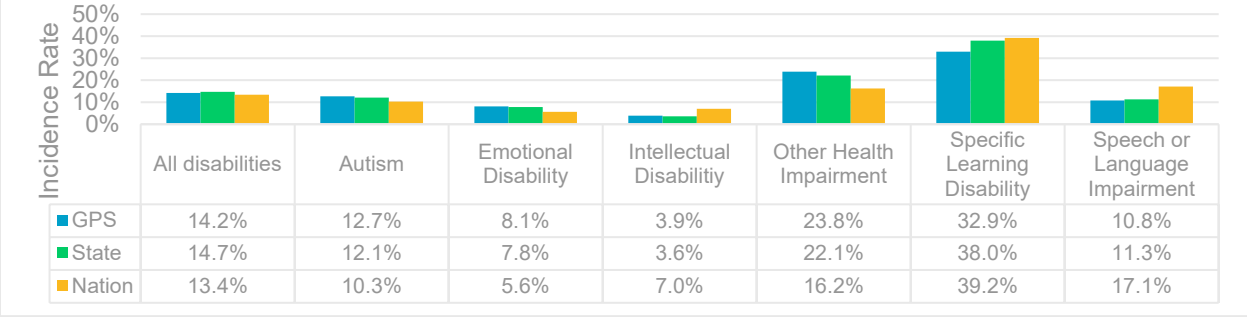
Exhibit 2. GPS IEP Rates (K-12) Compared to Other Connecticut School Districts and State, 2019-20



In FFY 2017, GPS's incidence rate for students with autism (12.7 percent) was slightly higher than the state (12.1 percent) and higher than the nation (10.3 percent). The District's identification rate for students with a health impairment (23.8 percent) was higher than the state (22.1 percent) and nation (16.2 percent). Furthermore, GPS's rate for students with a specific learning disability (32.9 percent) was lower than the state average (38.0 percent) and lower than the nation's (39.2 percent).[19]

Incidence Rates by Primary Disability Area

Exhibit 3. Percentage of GPS Students with IEPs by Disability Area Compared to State and Nation (Ages 6-21), FFY 2017



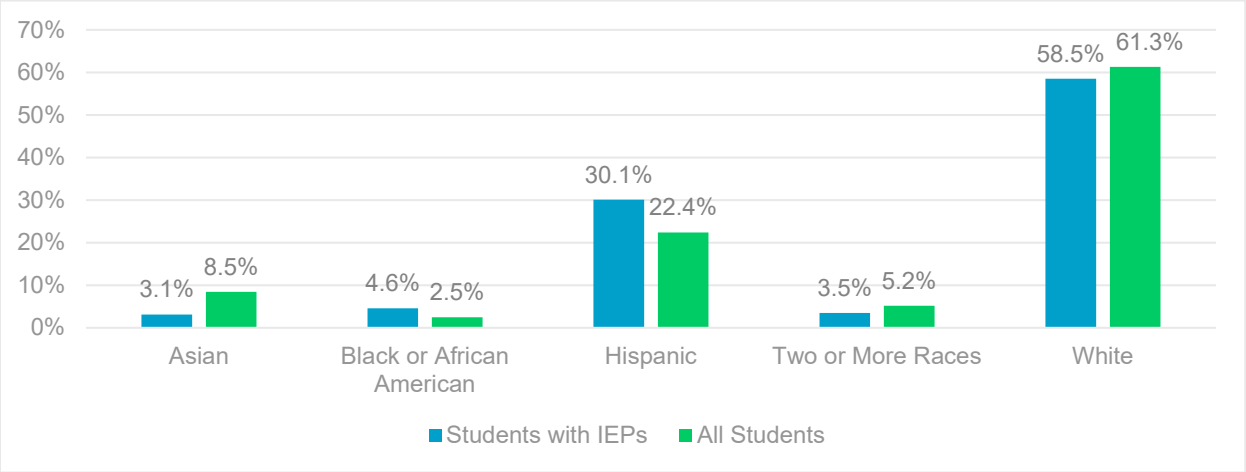
	All disabilities	Autism	Emotional Disability	Intellectual Disabilitiy	Other Health Impairment	Specific Learning Disability	Speech or Language Impairment
GPS	14.2%	12.7%	8.1%	3.9%	23.8%	32.9%	10.8%
State	14.7%	12.1%	7.8%	3.6%	22.1%	38.0%	11.3%
Nation	13.4%	10.3%	5.6%	7.0%	16.2%	39.2%	17.1%

Incidence Rate by Race/Ethnicity

The following all students enrolled in GPS, 61.3 percent were white, 22.4 percent were Hispanic, 8.5 percent were Asian, 5.2 percent were two or more races, and 2.5 percent were Black or African American. Of the students with IEPs, 58.5 percent were White, 30.1 percent were Hispanic, 4.6 percent were Black or African American, 3.1 percent were Asian, and 3.5 percent were two or more races.[20]

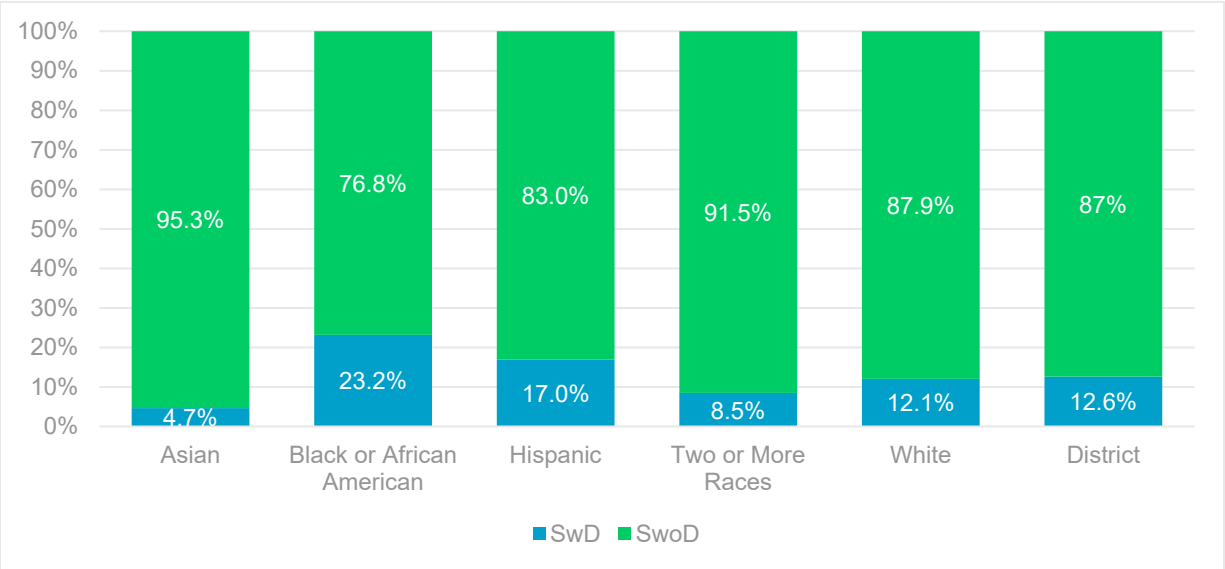
[19] District and State data obtained from EdSight. See: http://edsight.ct.gov/SASPortal/main.do. Nation data obtained from OSEP. See Grads360: https://osep.grads360.org/#p=19
[20] District data provided by GPS in 2020.

Exhibit 4. Percent of GPS Students with IEPs (K-12) Compared to Overall Student Enrollment by Race/Ethnicity, 2019[21]



The exhibit below compares the percentage of students with and without IEPs within each race/ethnicity category. Of all white students, 12.1 percent had an IEP compared to 23.2 percent of Black or African American students, 17.0 percent of Hispanic students, 8.5 percent of students with two or more races, and 4.7 percent of Asian students.

Exhibit 5. Percent of GPS Students with and without IEPs (k-12) by Race/Ethnicity, 2019[22]

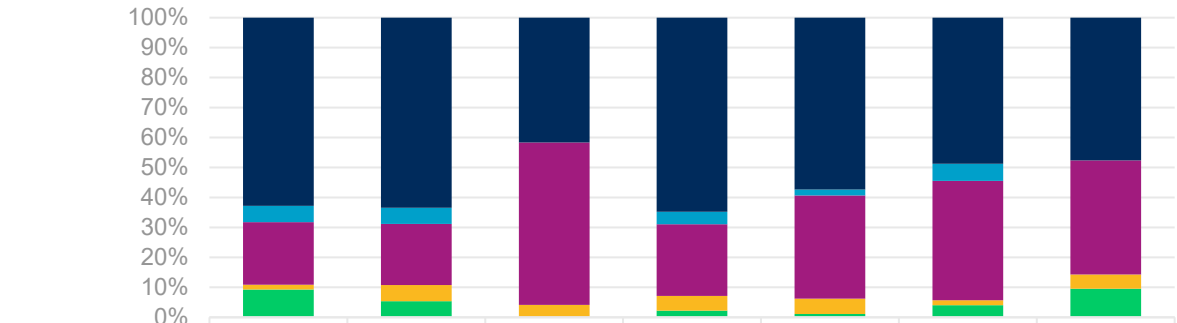


Data by race/ethnicity showed that for several disability areas student percentages exceeded associated overall district rates.[23] Key differences, displayed in the graph below, include:

[21] Data for the following Race/Ethnicity categories were suppressed due to n<10: American Indian or Alaskan Native and Native Hawaiian or Pacific Islander
[22] id.
[23] Other Disabilities includes students with primary disabilities of Hearing Impairment, Visual Impairment, Orthopedic Impairment, Deaf/Blindness, Multiple Disabilities, Traumatic Brain Injury, and Developmental Delay.

- White students accounted for 64.3 percent of students with a health impairment, 63.4 percent of students identified with an emotional disability, and 62.8 percent of students with autism. These percentages were higher than the overall percentage of white students with an IEP (61.3 percent).
- Hispanic students accounted for 54.2 percent of students with an intellectual disability, 39.8 percent of students with speech or language impairments, and 34.4 percent of students identified with a specific learning disability. These percentages were higher than the overall percentage of Hispanic students with an IEP (30.1 percent).
- Black or African American students accounted for 5.4 percent of students identified with an emotional disability, 5.1 percent of students with a specific learning disability, and 4.8 percent of students identified with a health impairment. These percentages were higher than the overall percentage of Black or African American students with an IEP (4.6 percent).

Exhibit 6. Percent of GPS Students (K-12) by Disability Area and Race/Ethnicity, 2019-20



	Autism	Emotional Disability	Intellectual Disability	Other Health Impairment	Specific Learning Disability	Speech or Language Impairment	Other
White	62.8%	63.4%	41.7%	64.3%	57.3%	48.8%	47.6%
Two or more races	5.4%	5.4%	0.0%	4.1%	2.0%	5.7%	0.0%
Hispanic	20.9%	20.4%	54.2%	23.8%	34.4%	39.8%	38.1%
Black or African American	1.6%	5.4%	4.2%	4.8%	5.1%	1.6%	4.8%
Asian	9.3%	5.4%	0.0%	2.2%	1.1%	4.1%	9.5%

Risk Ratio

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."[24] The risk ratio can be used to calculate disproportionality at both the state and district levels. The analysis below is intended to provide GPS with a tool to calculate risk ratios 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.[25] For example, it can be used to assess:

- How much more likely is it for Black or African American students to be classified with a disability compared to all other students;
- How much more likely is it for Black or African American students with disabilities to be suspended for more than 10 days compared to all other students with disabilities;

[24] 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.
[25] 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.

- What the likelihood is that a student from a particular racial or ethnic group will be identified with a disability, be given a specific disability classification, or placed in a most restrictive environment; and
- 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.

Under IDEA, the risk ratio is used to identify school districts having a significant disproportionality of students with IEPs from one race/ethnicity compared to students from all other race/ethnicities. Three broad categories are measured in this way: identification of disability (overall and by one of six categories), educational placement, and suspensions. IDEA requires the following areas of analysis showing the likelihood that students from a particular racial group:

- **Identification.** Are classified as having a disability, or one of six disability categories, i.e., autism, emotional disturbance, other health impairment, learning disability, and speech/language impairment
- **Placement.** Are educated in a general education class less than 40 percent of the time; or in a separate school, residential school or homebound setting
- **Disciplinary Removal.** Receive out-of-school suspensions (OSSs) for 10 days or less or for more than 10 days; in-school (ISSs) suspensions for 10 days or less or for more than 10 days; total disciplinary removals that include all OSSs, ISSs, hearing officer removals, and placement in interim alternative educational settings.

The identification "risk" looks at the number of students from one racial/ethnic group identified for a specified category and compares it to general enrollment data for the same racial/ethnic group. The quotient is then compared to the risk for students from all other racial/ethnic groups. The general risk equation is as follows:

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

For educational placement and suspension "risks" the equation is similar, but the comparison is different. Instead of using the number of enrolled students from the racial/ethnic group, the number used is all students with IEPs from the racial/ethnic group.

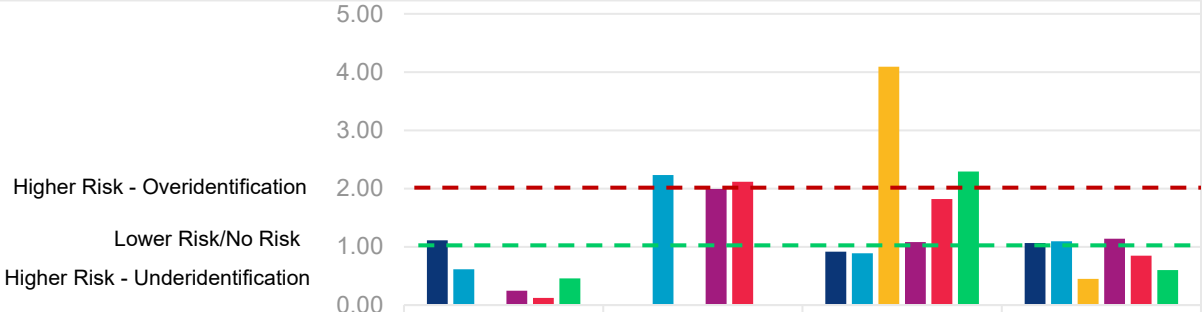
A risk ratio greater than 2.0 or a racial/ethnic group typically indicates a higher risk of over-representation, while a risk ratio of less than 0.5 indicates a higher risk of under-representation. The threshold for the identification of significant disproportionality is established by each state.

PCG conducted a risk ratio analysis of GPS 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 Connecticut'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, compared to other students, Hispanics were four times more likely to be identified with an intellectual disability and two times more likely to be identified with a speech or language

impairment. Black or African American students were twice as likely to be identified in the following areas: emotional disability, other health impairment, and specific learning disability. [26]

Exhibit 7. Risk Ratios by Race/Ethnicity and Disability, 2019-20 [27]



	Asian	Black or African American	Hispanic	White
Autism	1.11		0.92	1.07
Emotional Disability	0.62	2.23	0.89	1.10
Intellectual Disability	0.00		4.09	0.45
Other Health Impairment	0.25	2.00	1.08	1.14
Specific Learning Disability	0.12	2.12	1.82	0.85
Speech/ Language Impairment	0.46		2.29	0.60

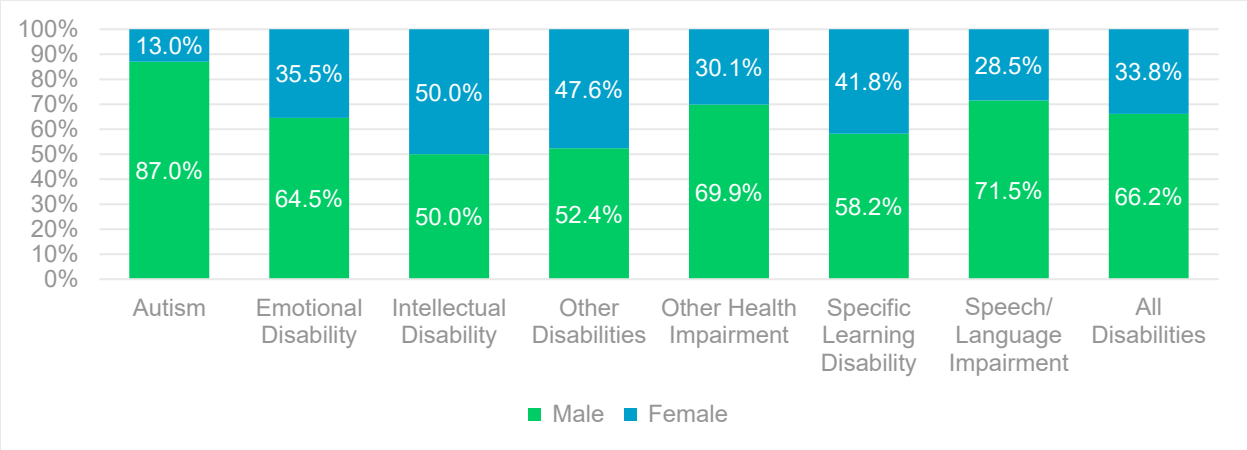
Incidence Rates by Gender

Overall, 66.2 percent of GPS students with IEPs were male, and 33.8 percent were female. These percentages align with national data, wherein roughly two-thirds of students receiving special education services were male (65.8 percent), and one-third (34.2 percent) were female. [28]

Male students comprised the majority of students identified in all disability categories, with the exception of intellectual disability. The percentage of males identified in the following disability categories was higher than the overall IEP average for males (66.2 percent): autism (87.0 percent), speech/language impairment (71.5 percent), and other health impairment (69.9 percent). Female students with IEPs accounted for 50 percent of students with an intellectual disability, 41.8 percent of students with a specific learning disability, and 35.5 percent of students with an emotional disability.

[26] Data provided by GPS in 2020.
[27] Data for the following Race/Ethnicity categories were suppressed due to n<10: American Indian or Alaskan Native and Native Hawaiian or Pacific Islander. Data for the following race/ethnicity and disability categories were suppressed due to n<5: Black or African American – Autism, Intellectual Disability, Speech/Language Impairment
[28] From the National Center for Education Statistics. See: https://nces.ed.gov/programs/digest/d20/tables/dt20_204.50.asp

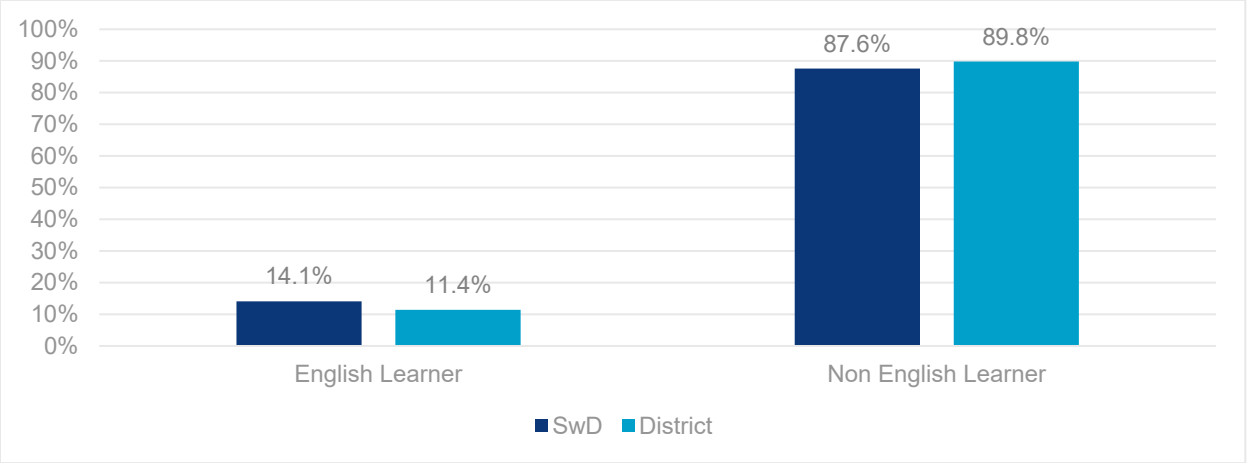
Exhibit 8. Percent of GPS Male vs. Female Students with IEPs (K-12) by Disability, 2019-20



Incidence Rates by EL Status

In 2019-20, 11.4 percent of students in GPS were English learners. The percent of students with IEPs who were also English learners was 14.1 percent.[29]

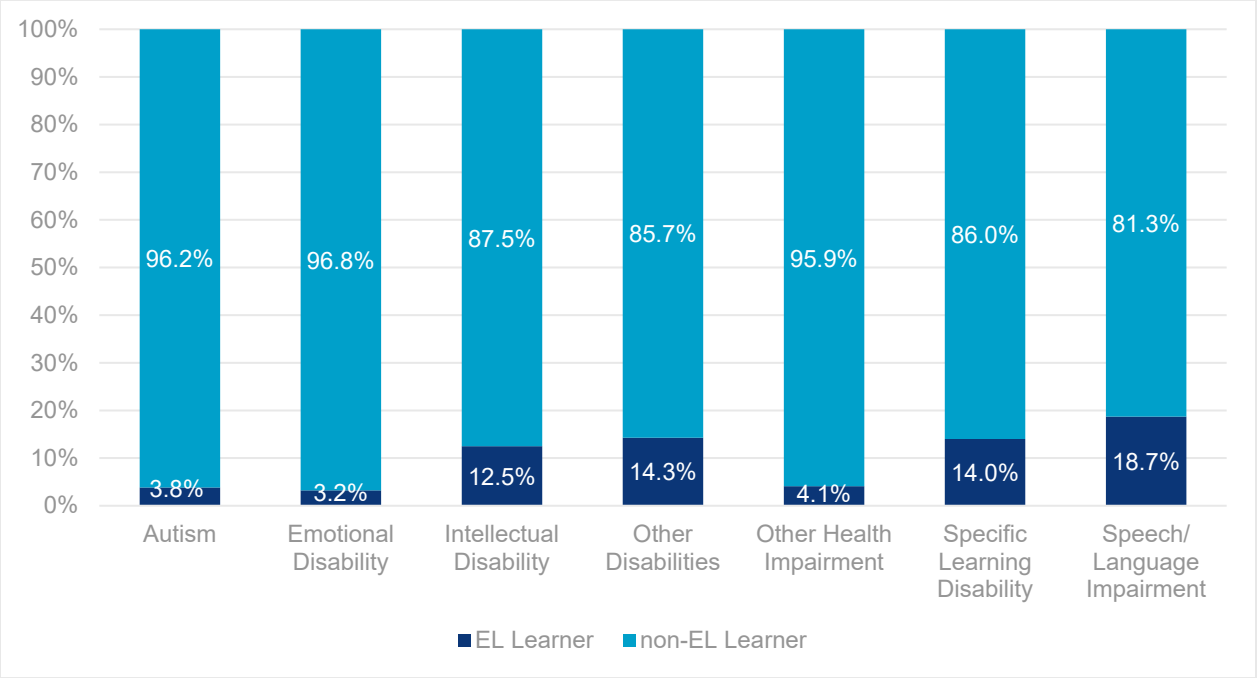
Exhibit 9. Percent of Students with and without IEPs (K-12) by EL Status, 2019-20



Of the students who were English learners, 18.7 percent had a speech/language impairment. This rate was higher than the overall rate of 14.1 percent of English learner students with an IEP.

[29] Data provided by GPS in 2020.

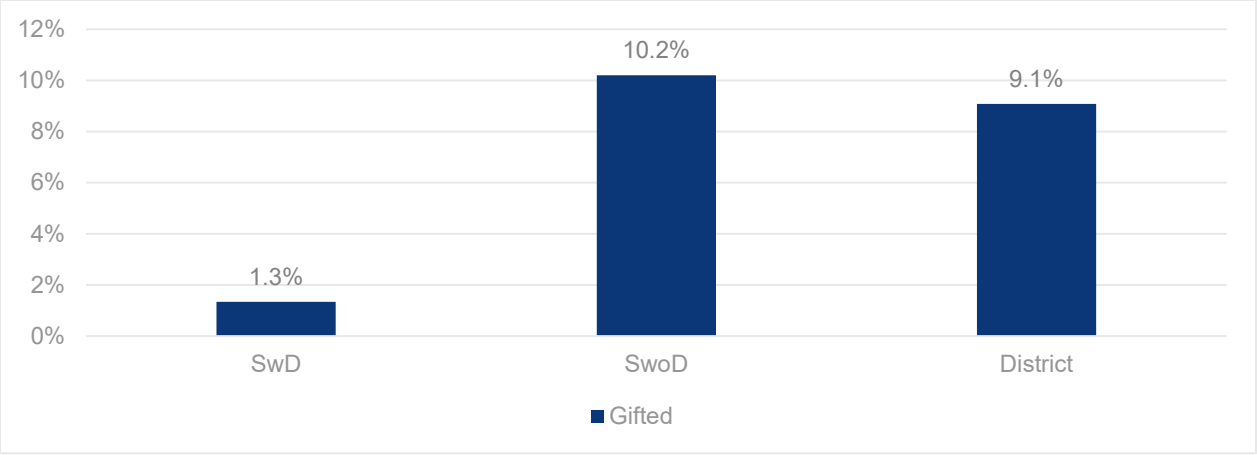
Exhibit 10. Percent of Students with IEPs (K-12) by EL Status and Disability Category, 2019



Incidence Rates by Gifted Status

Across the District, 9.1 percent of students were identified as gifted. Of students with an IEP, 1.3 percent were identified as gifted, compared to 10.2 percent of students without an IEP.

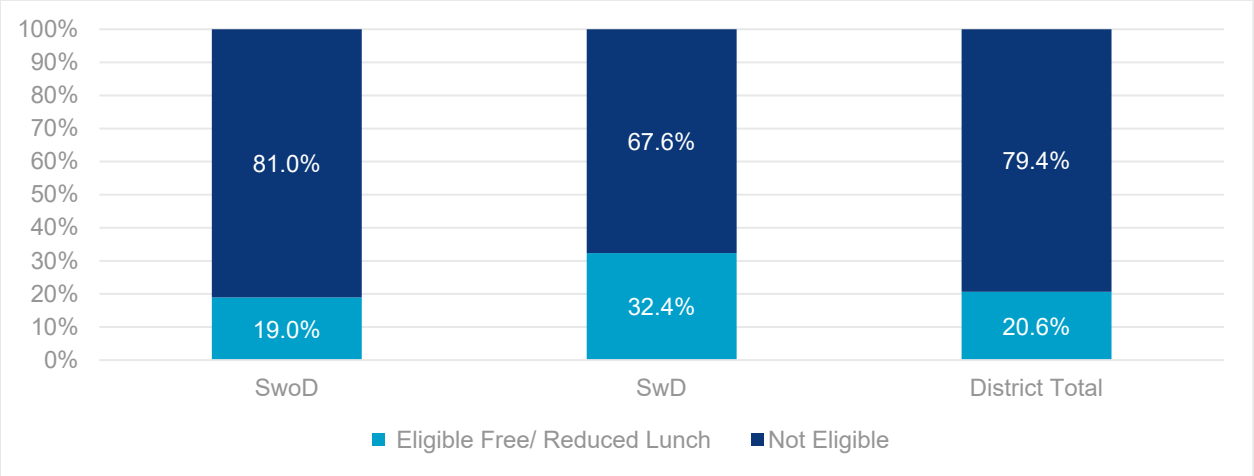
Exhibit 11. Percent of Gifted Students with and without an IEP, 2019-20



Incidence Rates by Free or Reducted Lunch Status

Across the District, 20.6 percent of students are eligible for the free or reduced lunch program. Of the students with an IEP, 32.4 percent were eligible, compared to 19.0 percent of students without an IEP.

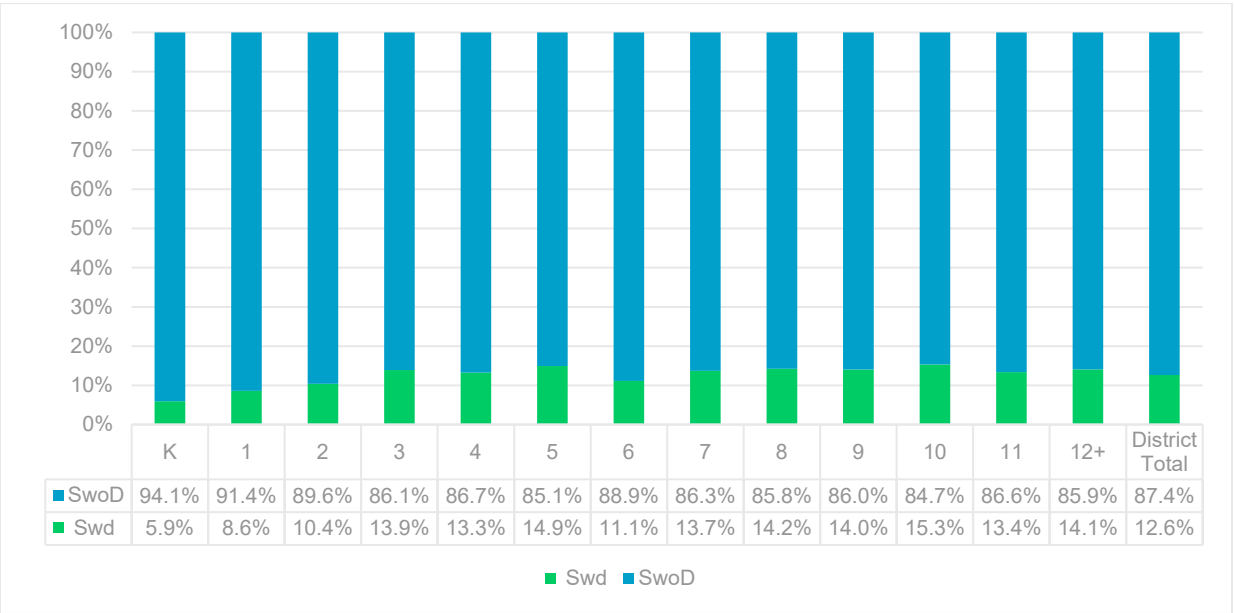
Exhibit 12. Percent of Students with and without IEPs (K-12) by Free or Reduced Lunch Eligibility, 2019



Incidence Rates by Grade

The exhibit below displays the percent of GPS students with IEPs based on each grade level enrollment. Overall, students with IEPs comprised 12.6 percent of all enrolled students. The disability rate was lowest in kindergarten (5.9 percent) and grade 1 (8.6 percent), and highest in grades 5, 8, and 12 (14.9 percent, 14.0 percent, and 14.1 percent, respectively).

Exhibit 13. Percent of Students (Grades K-12+) Receiving Special Education Services by Grade, 2019-20



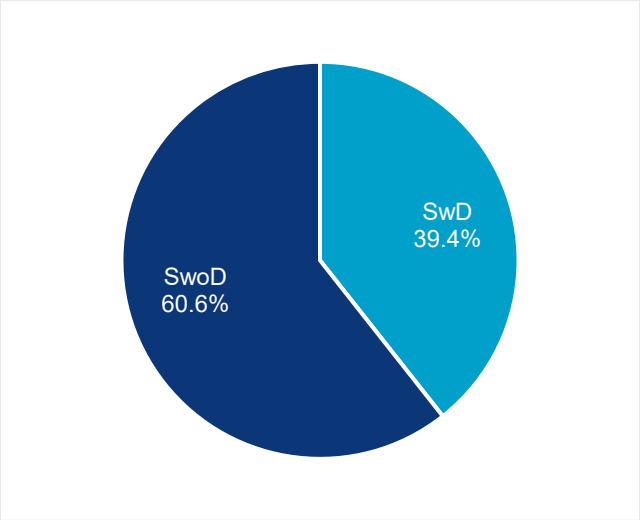
	K	1	2	3	4	5	6	7	8	9	10	11	12+	District Total
SwoD	94.1%	91.4%	89.6%	86.1%	86.7%	85.1%	88.9%	86.3%	85.8%	86.0%	84.7%	86.6%	85.9%	87.4%
Swd	5.9%	8.6%	10.4%	13.9%	13.3%	14.9%	11.1%	13.7%	14.2%	14.0%	15.3%	13.4%	14.1%	12.6%

Early Childhood Education Demographics

Overall Incidence Rates

Of students ages 3-5, 39.4 percent have an IEP.

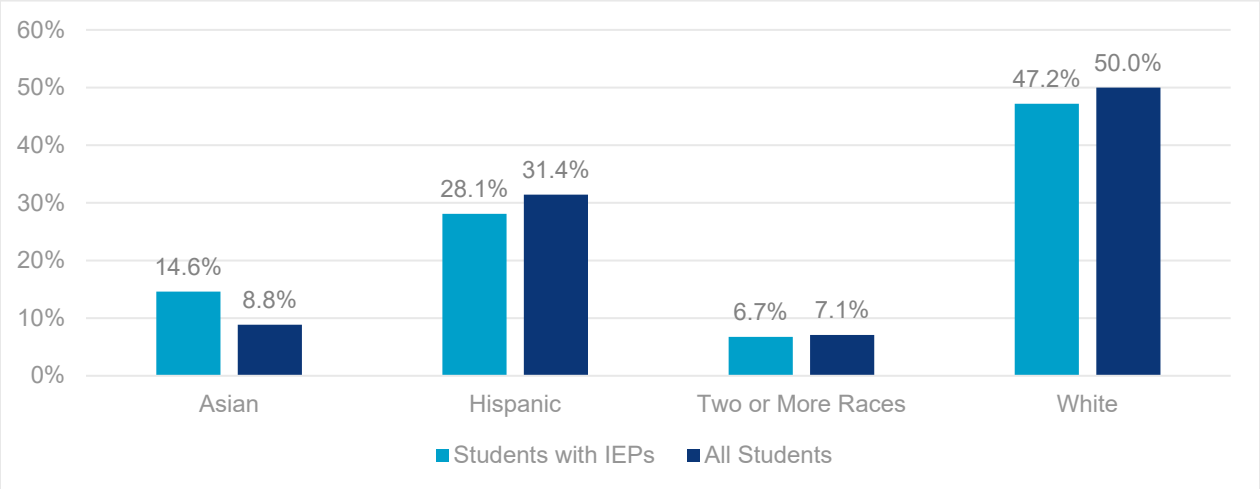
Exhibit 14. Percent of Students (Ages 3-5) with and without an IEP, 2019-20



Incidence Rate by Race/Ethnicity

Of all GPS students enrolled in early education, 50.0 percent were white, 31.4 percent were Hispanic, 8.8 percent were Asian, and 7.1 percent were two or more races.[30] Of children with IEPs, 47.2 percent were white, 28.1 percent were Hispanic, 14.6 percent were Asian, and 6.7 percent were two or more races. Asian students had the largest difference between their disability and overall enrollment rates.

Exhibit 15. Percent of GPS Students with and without IEPs (Ages 3-5) by Race/Ethnicity, 2019-20

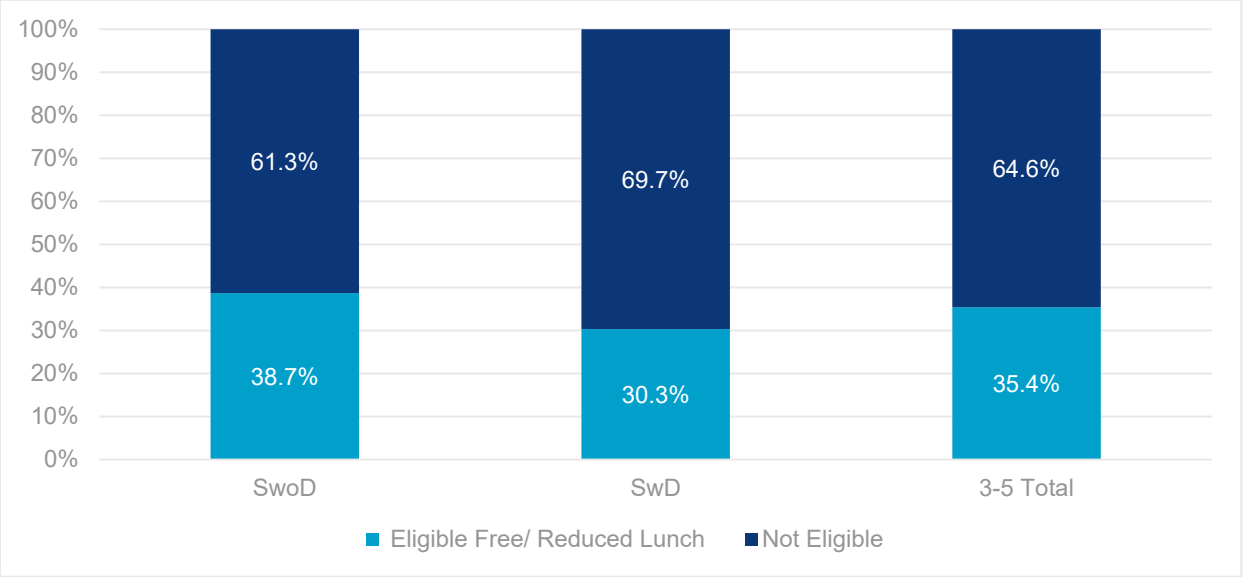


Incidence Rate by Free or Reduced Lunch Status

Of all students enrolled in early childhood education at GPS, 35.4 percent were eligible for free or reduced lunch. A more significant percentage of students without a disability were eligible for free or reduced lunch (38.7 percent) compared to students with IEPs (30.3 percent).

[30] The following Race/Ethnicity groups had n<5: American Indian or Alaskan Native, Black or African American, and Native Hawaiian or Other Pacific Islander

Exhibit 16. Percent of Students with and without IEPs (Ages 3-5) Eligible for Free or Reduced Lunch, 2019-20



Summary and Implications

The four deficiencies – PPT Process, Communications and Engagement, Continuum of Services, and Professional Development – identified in the prior five external special education reports spanning 24 years continue to hinder GPS's special education program. The implications of this are significant and far-reaching – the department's inertia to act with urgency on these matters has further seeded mistrust among parents and staff. And, more importantly, these shortcomings have served as impediments to supporting the needs of the District's students with disabilities. As GPS charts a new course, attention should be paid to data trends that, if not corrected, could continue to create obstacles for equitable access to a high-quality education among subgroups of students. Specifically, Hispanic students were four times more likely to be identified with an intellectual disability and two times more likely to be identified with a speech/language impairment. Black or African American students were twice as likely to be identified as having an emotional disability, other health impairment, or specific learning disability. Of students with an IEP, 32.4 percent were economically disadvantaged compared to 19.0 percent of students without an IEP yet only 30.3 percent of children enrolled in early childhood were identified compared to the larger rate of 38.7 percent of unidentified children. Conducting evaluations through a culturally competent lens and improving outreach for families with children likely to be eligible for free and reduced lunch will be required focus areas.

III. SPECIAL EDUCATION SERVICES

Strengths	Opportunities for Improvement
• **Educator Commitment**. The District has committed educators (teachers, paraprofessionals, related service providers) dedicated to supporting students with IEPs. • **Pre-K Performance Data**. GPS's Pre-K special outcomes data in the State Performance Plan/Annual Performance Report (SPP/APR) show positive and sustained student outcomes. • **Progress Reporting**. IEP progress reports often include quantifiable data indicating student progress. • **Shared Beliefs Among Many Teachers about Supporting Special Education Students**. Many teachers across the District shared a wholehearted belief that students with disabilities are their students.	• **Multi-Tiered System of Supports**. There is inconsistent use of an MTSS framework to support struggling learners or special education referral data and conflicting beliefs on how the process can potentially support the needs of struggling students who may be identified in the future as students with disabilities. • **IEP/PPT Process**. The process lacks consistency across the District because staff feel they receive conflicting messages from the PPS Office and inconsistently apply procedures in the Red Book. • **Parental Frustrations about Process**. Parents experience frustration with the PPT process specifically around trust, collaboration, information sharing, and adherence to timelines. • **Achievement Gap**. Achievement gaps have plateaued between GPS students with disabilities and typically developing peers. • **Resource Support**. District offers resource support for students as determined by PPT; however, there are inconsistent specialized supports for students with low incidence disabilities with unique learning needs (e.g., autism). • **Deficiencies with the continuum of services**. By engaging in an unofficial policy of not "labeling" through programming, students with unique learning needs may not be getting access to learning supports and strategies specific to characteristics with their disability. • **Classes that are Inclusion in Name Only**. Classes in the middle and high schools where the majority of students have IEPs and 504 Plans are taught by general education teachers have limited special education supports. • **Limited or Non-existent Co-teaching**. Co-teaching only occurs at the middle school level in select classes. It does not exist in the elementary schools and high school. • **Collaborative Teaching Model**. GPS engages in a form of collaborative teaching in the middle schools and high school known as Academic Lab; however, partnerships between general education and special

	education teachers are weak, not specific to the instruction occurring in the moment, and are reactionary to supporting the student after they are showing an academic issue.

Child Find and Identification Practices

As required by IDEA and state regulations, each Connecticut public school district is responsible for identifying, locating, and evaluating all children who may be eligible for special education services. This is known as "Child Find." Parents, teachers, or other school personnel may refer a child for evaluation to determine whether the child may be eligible for special education. If the PPT suspects that a child may have a disability, school personnel will evaluate the child in all areas of the suspected disability. When the evaluation process is complete, the PPT will meet to review the results of the evaluation and determine whether the child is eligible for special education and related services.[31]

Before a referral is made for special education, schools may provide general education strategies and interventions to assess whether a struggling student needs additional supports or should be referred for special education evaluation. Schools may engage in interventions by following a Multi-Tiered System of Supports (MTSS) Framework and engaging their respective building's Student Assistance Team (SAT).

Multi-Tiered System of Supports Framework

The provision of instruction/interventions and support to students within an MTSS framework improves educational outcomes for all students.[32] The framework focuses on prevention and the early identification of students who may benefit from instructional and behavioral interventions, as well as acceleration that removes barriers to learning.[33] 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 can support reductions in otherwise disproportionate special education referrals of students based on race, gender, or EL subgroups. Prior to the development of the MTSS framework methodology, school districts typically employed a separate Response to Intervention (RTI) process to address poor achievement and Positive Behavior Intervention and Supports (PBIS) process to address poor behavior. These two processes merged into what is now nationally known as MTSS and is focused on the whole child.

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. ESSA 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."[34] MTSS provides an overall framework for structuring and coordinating the provision of core instruction along with additional behavioral supports, such as behavior modifications or mental health supports.

MTSS is centered on a tiered system of supports in which 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.

[31] https://portal.ct.gov/-/media/SDE/Commissioner/specialed2.pdf?la=en
[32] 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, 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.
[33] 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.
[34] Elementary and Secondary Education Act, as reauthorized in 2015.

Movement between 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 requires extra support should not miss the 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 system based in the principles of Universal Design for Learning, learning differences are addressed proactively rather than reactively. The instruction is culturally relevant and linguistically appropriate and is implemented with integrity for all students. The MTSS framework is based on a presumption that some students require additional instruction 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 frameworks that align with the core tenets of the MTSS process and branded them accordingly.

District Practices

According to focus group participants, GPS refers to its three-tiered support system as RTI. The district is presently engaged in a study of its RTI programming; however, PCG is most interested in how it is presently being applied to support data-informed referrals for special education evaluations.

Within GPS, RTI operates through its SATs without the benefit of a systemwide framework for its usage. As a result, teams operate differently in each school building. Based on information gathered from interviews, there are differences of opinion within GPS as to how RtI should support students with disabilities. According to some, there is a belief that "the more special education is a part of RtI, the more it becomes like a path to special education." Though schools are looking at data regularly, the lack of a systemwide framework results in RTI being used as a "de facto special education" referral process. Some District administration shared they would like RtI to be "an intervention in the curriculum and not an intervention with the student." For example, "if 14 students are struggling with reading comprehension and getting referred – maybe it's an issue with instruction. Are they teaching it well? Are staff provided professional development? The focus should be on the system and not the student."

School-Based Problem-Solving Teams

Building leaders and school-based staff shared differing models by which RtI operates in their buildings to support struggling students. In particular, they shared the following information:

- "Our Student Assessment Team (SAT) only needs to decide if we're going to put the kids into RtI. Yes, we will start an actual recorded intervention--let's see how the kid does in tier 1, even though it doesn't officially go into RTI. Like today I'm talking about the kids grades K-2 who might need interventions. We're already 6 weeks into interventions with kids who have had them last year."
- "First they're referred through the homeroom teacher for the most part. It's an RtI team, but we still call it SAT. On the team there's a reading specialist and a special education teacher. My reading specialist has taken over those meetings. There are so many meetings that it's difficult to always have an administrator there. There is a packet of information that the teacher has – what they've tried in the classroom, the amount of parent contact. This year we actually have a math interventionist – it's a great start. That came to be from principals asking and schools asking for that for years. I'm a school that receives Title I funds – so I paid one of the teachers to be a .3 interventionist. The schools with those funds have been able to provide that, and we said we need this at every school. Our teacher union had a hand in this too. We don't have a set guideline for intervention time. It will usually go for a 6-8 week session for those particular skills – if we receive

growth in those areas – depending on how much growth the student is making is how we determine whether it's a long term intervention or not."

- "Historically we tried to have a position [in charge of RtI] – an administrator who would be in charge of fact finding the RtI process here and then really calibrating the process so that it looks and sounds similar at every school. Unfortunately, that funding was cut about two years ago, so they did not hire someone to do that. But I think that would be a great place to start."
- "…I would like to see an improvement with the RTI process. It needs to be more clearly defined."
- "I would certainly talk through the process with parents prior to the PPT and then obviously their need for consent if we wanted to move forward. But we employ a lot of interventions and watch our data carefully and then we make decisions from there."
- "RtI program needs major improvement (all tiers, all subjects). We need to reestablish protocols, programs, instruction, entrance and exit criteria. We also need to be more liberal with interventions – if the data says that a student needs intervention, we should act on that immediately. Right now, we go through a lengthy process where I feel we are simply stalling and delaying in the name of providing more anecdotes, work sample, data, etc. Many times these students have been in and out of interventions for many years, and I would like the process for entry to be more data based. Also, intervention documentation is often lost in translation so there is little continuity between years and schools when interventions need to be continued the following year (in other words, at the 6th grade level at least, RtI often feels like starting from scratch rather than continuing an established program). More honesty is needed around what services can and cannot be reasonably provided."
- "We NEED a comprehensive RtI model that is run effectively and with fidelity. This is not special education, but it is necessary for provided scientific-research-based interventions to see what is effective with students before the referral process. We also need a PBIS plan that is implemented with fidelity."

The existence of a coordinated RTI system to address struggling students was not evident in the classroom visits that PCG conducted. During pre- and post-meetings, teachers did not discuss employing RtI or MTSS within their instruction.

During interviews and focus groups, school-based focus groups also shared the following, listed below by theme:

Timelines

- "Unidentified students take too long to be addressed properly. The steps make little sense sometimes when it's clear a student needs help, but we go through too many tiers to get there."
- "What's the typical time frame from SAT to the time be determined to be evaluated? It varies depending on the severity. First there's a tier 1, where the teacher is working with the students. For tier 2 its 4-6-8 weeks for that process, then tier 3. We usually do 2 interventions before we make a determination, or earlier on if it's obvious. But really it could be anywhere from 2-6 months."
- "… (W)e try to put students on intervention plans early as possible. There are kids who are on interventions for 6 weeks, 8 weeks. We try to do it as early as we can. It's just different for each student. Some students are on interventions for a long time, because they're making progress. I don't know there's a typical window of time. Others it can take longer than the 6-8 weeks. Just because there is an intervention doesn't mean we suspect a disability. Sometimes it can be over a year that a student can be on an intervention or several interventions. Sometimes it takes longer."
- "Our procedure for identifying kids is dysfunctional. Only the children whose parents are extremely vocal get identified early. The children whose parents can't or don't advocate languish in the intervention system, which is worse than the identification process. I understand trying a series of steps, but they are not done with fidelity at our school. It used to be the school/district trusted the

K-2 teachers who worked seamlessly with SPED teachers and got the kids identified and help. We shouldn't be having kids identified in 5th grade after years of teachers saying he/she needed help. Also, if a qualified SPED teacher was assigned to each grade, it'd be amazing! Obviously, that'd help everyone involved, but it could a simple solution to streamlining the intervention and identification process that clearly doesn't work."

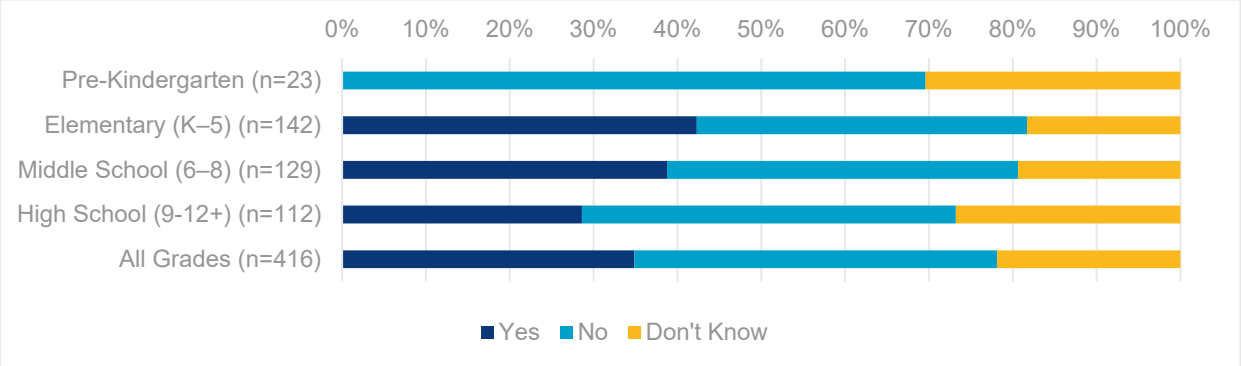
Intervention Support, Staffing, and Data Use

- "… it's almost like everybody works in silos. So instead of special education being integrated within and working with the coordinators of … respective fields, it's almost like it's in isolation."
- "Typically, if a classroom teacher is noticing, based on some data or universal screen which is STAR or other assessments, classroom or curriculum based or otherwise that a student is not achieving, they would implement a 6-to-8-week Tier 1 intervention. They would keep data. And now to be fully transparent, that necessarily is not typically put into RTI at the tier one level. That's something I know that the district has been trying to kind of work on and train teachers and kind of move toward, but that hasn't happened yet."
- "Strategies are employed by the teacher, but then obviously, if that doesn't support or help anything, we use data to create interventions, and we employ various types of interventions based on the need, so it could for a child who's experiencing decoding issues or fluency issues. Some type of reading issue. So obviously we use a lot of data to determine where the interventions really need to be pinpointed, and we employ those interventions. We have a literacy specialist here that certainly helps regarding it. All the schools now have a math interventionist as well, which has certainly been helpful. And then we watched that data very carefully over the course of time. We don't want to see that gap broadened, and we want to see progress."
- "I know it's different people at different buildings who take on the lead SAT role. Sometimes it's the assistant principal, sometimes it's other people in the building. We now have a .5 math interventionist, which was a new role that the Superintendent created this year. This helps during the SAT, but I know in some buildings that position is utilized as the head kind of SAT leader."

In the GPS parent survey, parents were asked whether they believed their child received interventions through the Response to Intervention (RTI) process.

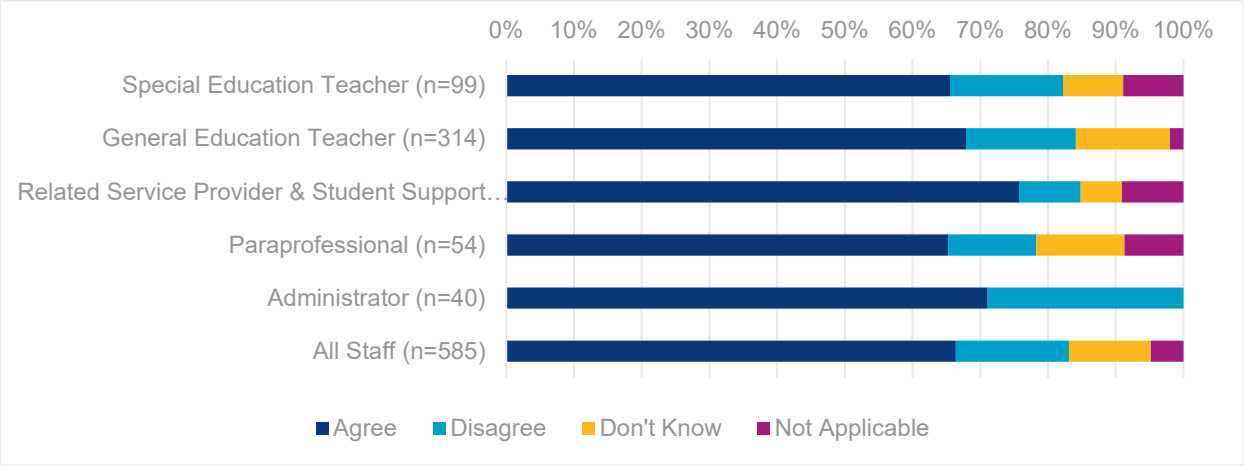
As noted below, of all parents who responded, only 35 percent believed their child received interventions.

Exhibit 17. Parent Survey: My child received interventions through the Response to Intervention (RtI) process (e.g., reading and/or math interventions).



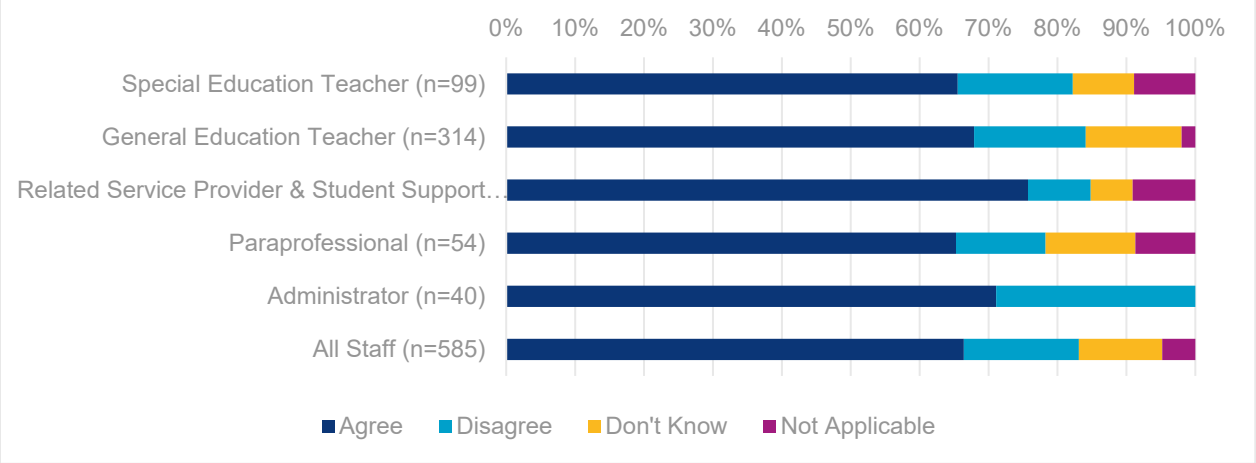
Staff were surveyed about attempts to provide support for students in general education prior to a special education referral. Approximately 65 percent of the special education teachers, and just under 70 percent of the general education teachers agreed.

Exhibit 18. Staff Survey: Before a student is referred for special education, every attempt is made to meet the student's needs through general education interventions.



GPS staff were asked if their school provides sufficient Tier 1 general education reading intervention support.[35] The majority of general and special education teachers agreed.

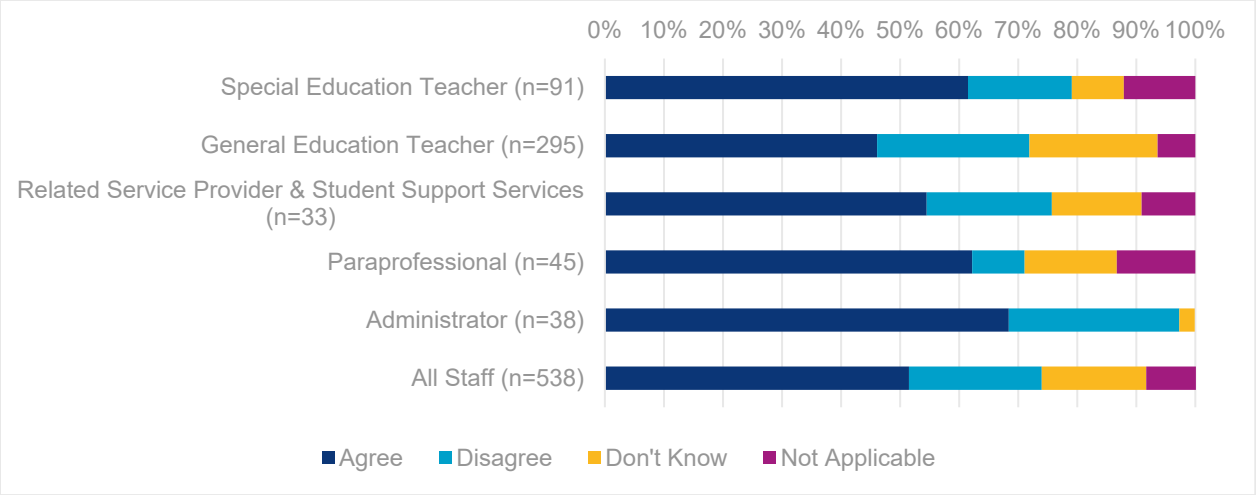
Exhibit 19. Staff Survey: Our school provides sufficient Tier 1 general education reading intervention support.



In the GPS staff survey, staff were asked if their school provides sufficient Tier 1 general education math intervention support. More than 60 percent of special education teachers and less than 50 percent of general education teachers indicated that their school provides sufficient Tier 1 support in math.

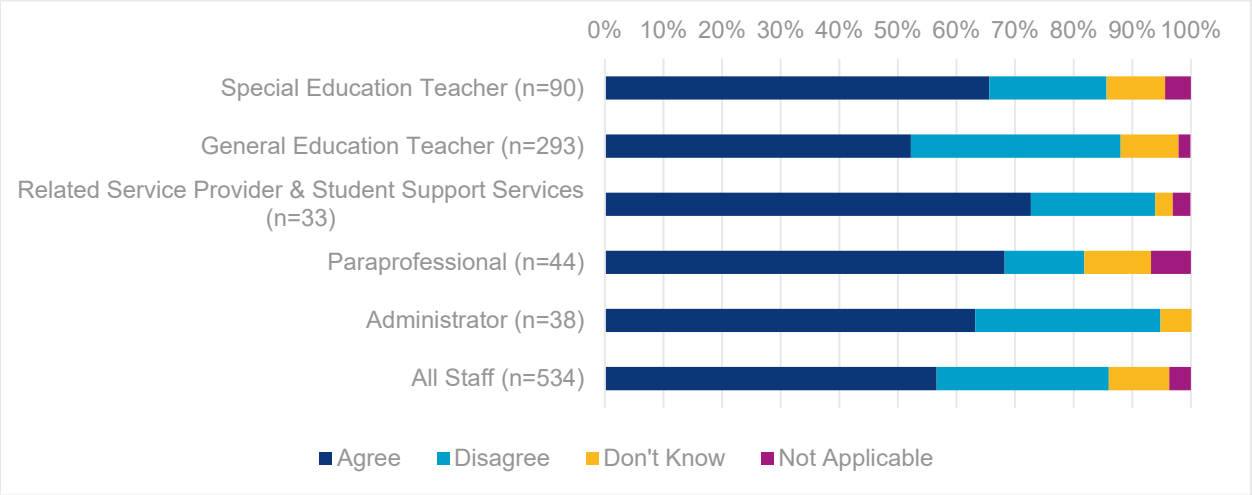
[35] Tier 1 means all students receive high-quality, scientifically based instruction provided by qualified personnel.

Exhibit 20. Staff Survey: Our school provides sufficient Tier 1 general education math intervention support.



In the GPS staff survey, staff were asked if their school provides sufficient Tier 1 general education behavior intervention support. Less than 65 percent of special education teachers and more than 50 percent of general education teachers indicated that their school provides sufficient Tier 1 behavior intervention support.

Exhibit 21. Staff Survey: Our school provides sufficient Tier 1 general education behavior intervention support.



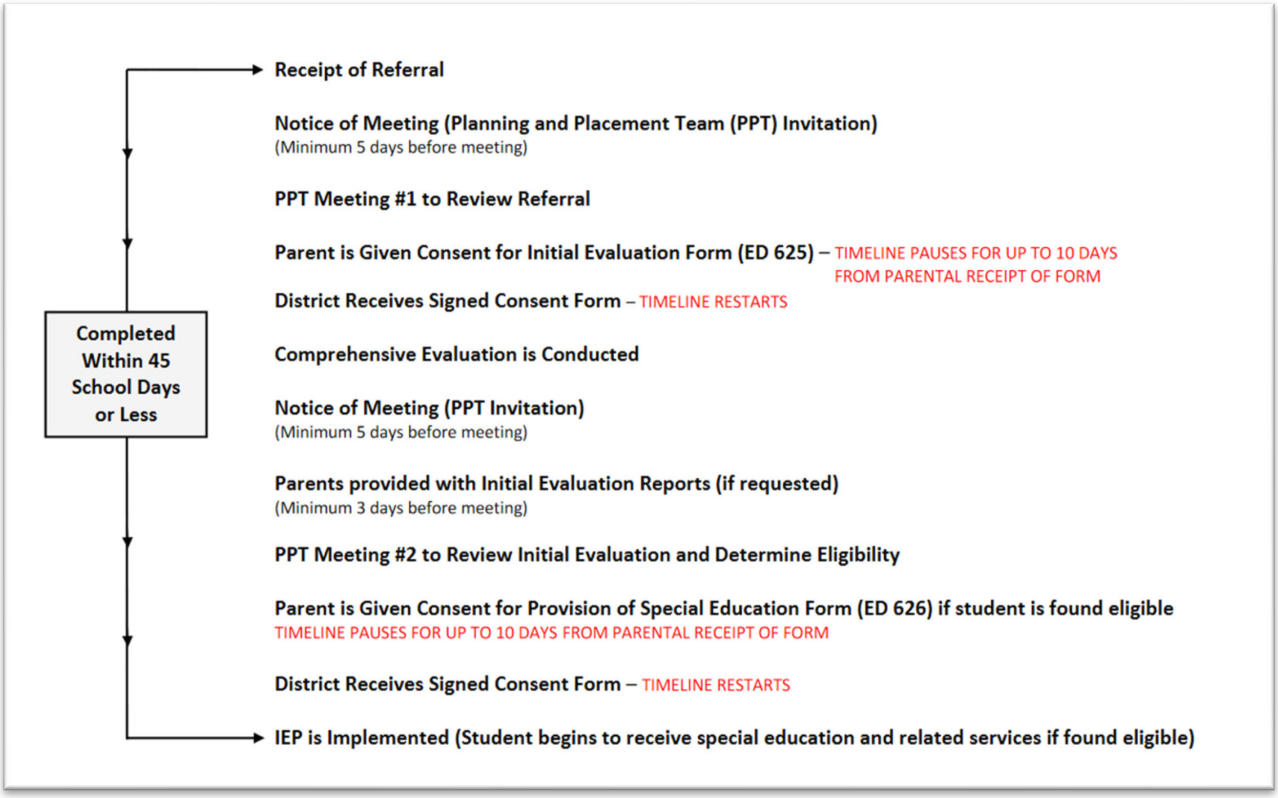
Teachers offered little qualitative data during focus groups on Tier 1 behavioral supports; however, they did offer in the survey the following comments regarding behavioral supports:

- “I think students in Greenwich receive high quality support in both academics and behavioral supports. Most staff are incredibly invested and skilled in helping students.”
- “Think creatively, have a pool of talented special education teachers and service providers, tier I support, classifying under IDEA, PBIS (when implemented with fidelity), consistently communicate between buildings and central office, PD offerings, behavior support, FBA/BIP.”
- “Inclusive practices, availability of district professionals like behavior support team, admin, pre-K services.”

Special Education Referral Practices and Evaluations

In accordance with federal IDEA law, following a referral for special education services, the parent or guardian is provided notice to a meeting to determine the need for an evaluation. In Connecticut, the following timeline occurs upon receipt of a referral for an evaluation.

Exhibit 22. State of Connecticut's Referral Timeline [36]

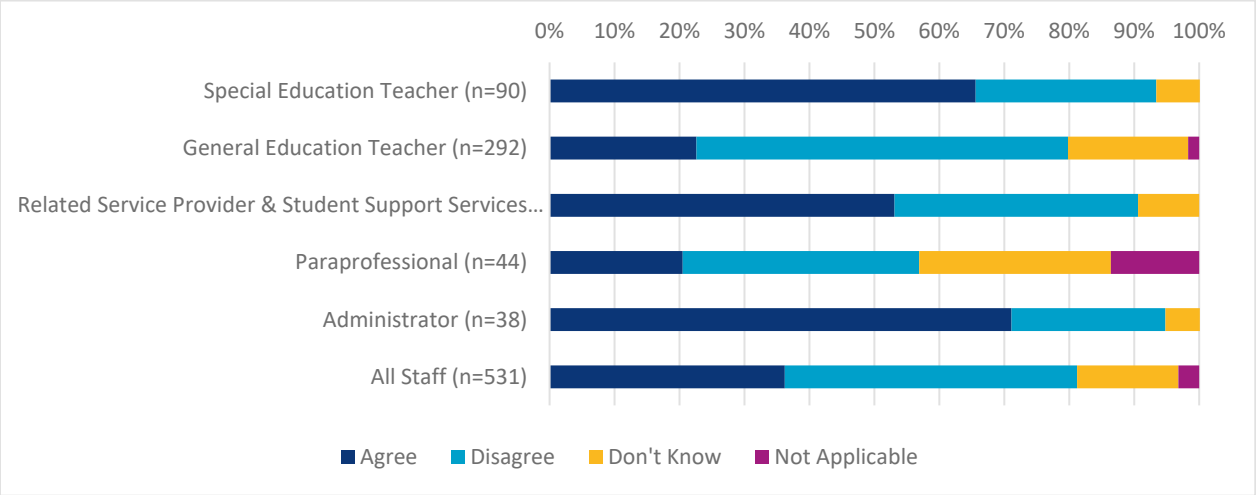


Timeliness of Special Education Referrals in GPS

In the GPS staff survey, staff were asked to agree or disagree with the following statement: "There was no delay in the process when a student is referred for special education services." The response to this varied most widely between special education and general education teachers. More than 60 percent of special education teachers agreed with the statement, yet only slightly more than 20 percent of general education teachers agreed.

[36] Memo from Connecticut Bryan Klimkiewicz, Division Director, Bureau of Special Education to Special Education Directors, January 23, 2020: https://cpacinc.org/docs/news/Timeline-for-Initial-Evaluation-Memo.pdf

Exhibit 23. Staff Survey: There was no delay in the process when a student is referred for special education services.

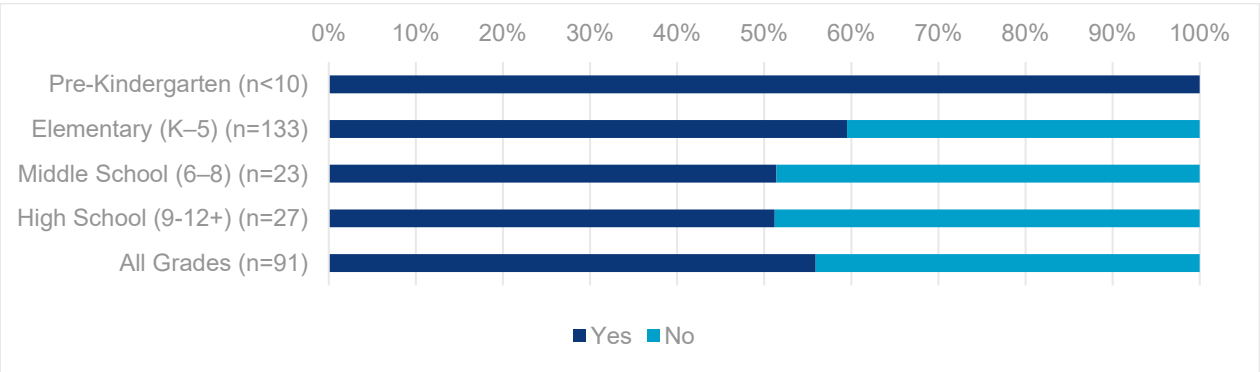


Teachers offered a few survey comments regarding referral delays, including:

- "The process is broken. It takes far too long for a student to go through the evaluation process. There are so many roadblocks and often the word of the teachers in the building are not enough for central office."
- "One way Greenwich can improve is to have strong RTI interventions and know when to recommend students for evaluations."
- "We are often told not to recommend students for evaluation because the evaluation team is overwhelmed. We should be able to recommend when we deem necessary, not based on their needs."

In the parent survey, parents were asked a similar question about the timeliness of a referral to special education. Just over half (56 percent) of all parents agreed that referrals for special education were made in a timely manner.

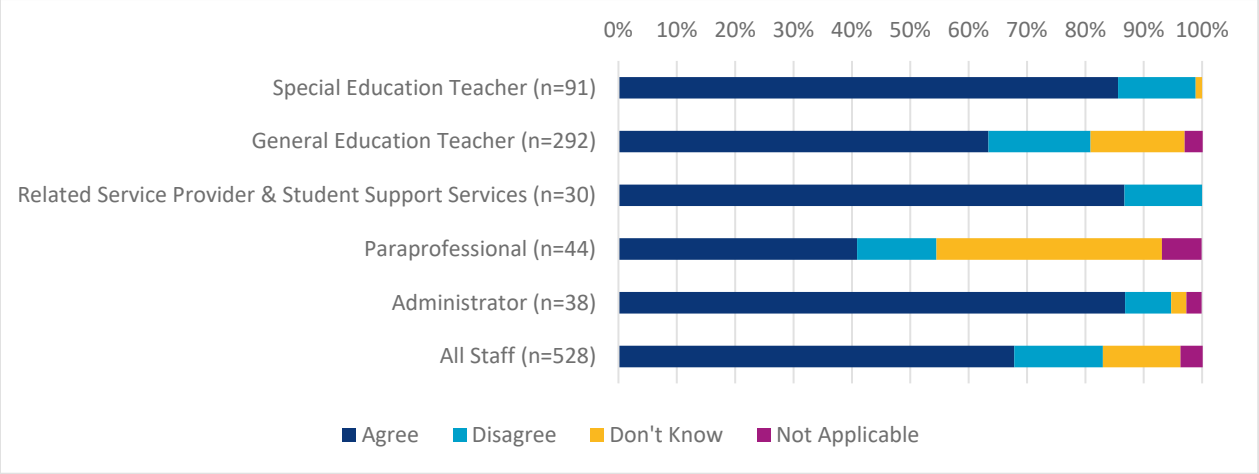
Exhibit 24. Parent Survey: Do you believe the referral for a special education was made in a timely manner?



In the GPS staff survey, staff were asked to agree or disagree with the following statement: "Special education evaluations are sufficiently comprehensive to identify students' specific strengths and needs."

More than 80 percent of the special education staff agreed with the statement, while more than 60 percent of the general education staff agreed.

Exhibit 25. Staff Survey: Special education evaluations are sufficiently comprehensive to identify students' specific strengths and needs.

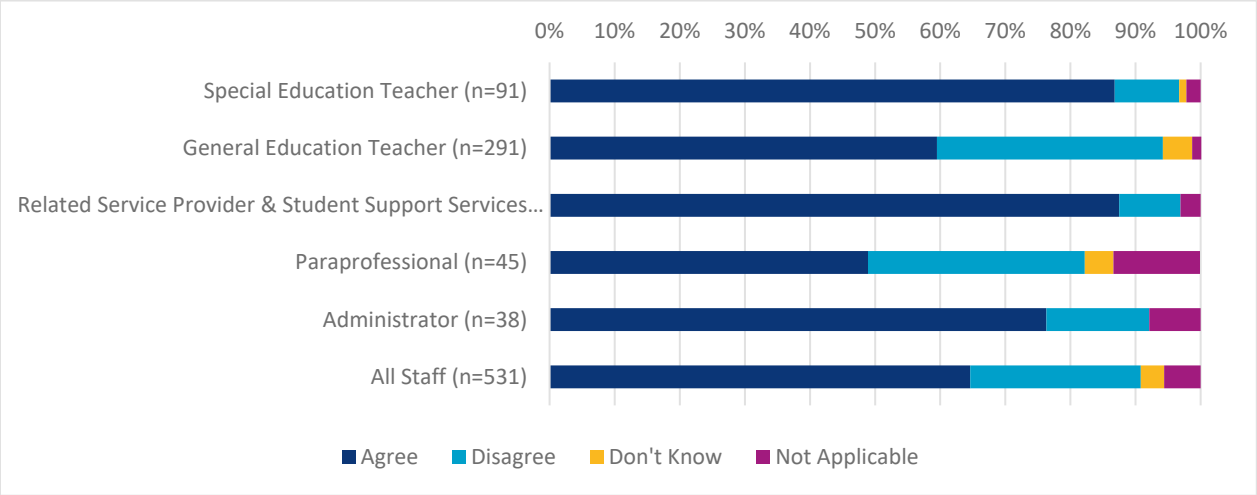


Qualitative responses from teachers on this matter include the following:

- "The caseloads of all special education teachers and related service providers at the high school level is unmanageable. While some elementary PPS staff have numbers as low as 14 students on their caseload, the high school staff have numbers into the 60s and 70s. While providing services, and attending PPTs, team meetings, and Path meetings, plus assessing students, schedules are often double booked. Also, the use of the evaluation team is not balanced..."
- "Preschool follows the evaluation process and IEP timelines to the letter. We create programs that are tailored for the student specifically, hoping to help prepare them for elementary school with a variety of visuals, behavior interventions, and a lot of trial and error to find what works best for the student."

In the GPS staff survey, staff were asked to agree or disagree with the following statement: "The results of special education evaluations are shared with me in ways that provide meaningful insights into students' educational needs." Eighty-seven percent of special education teachers agreed with this statement, while only 60 percent of general education teachers agreed.

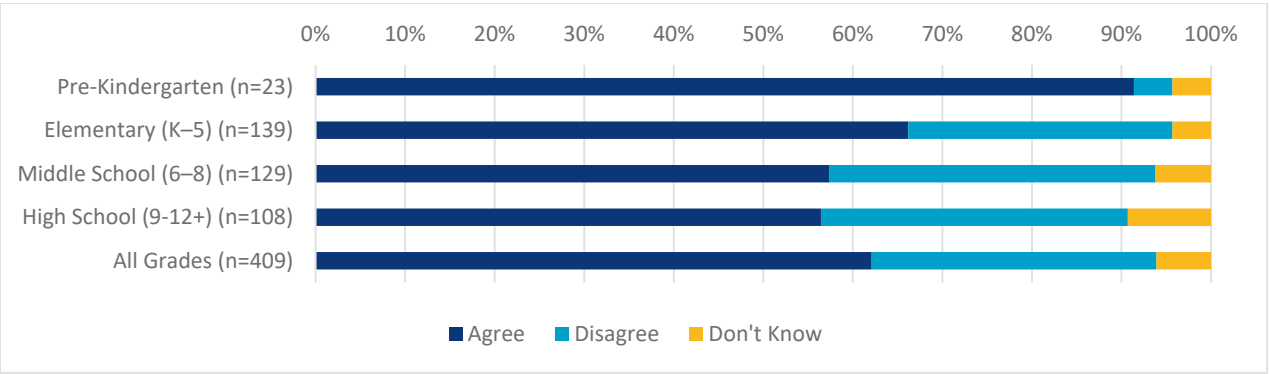
Exhibit 26. Staff Survey: The results of special education evaluation results are shared with me in ways that provide meaningful insights into students' educational needs.



One teacher commented that "[e]valuation teams do a great job of giving a full picture of a student's ability."

Similar to the question asked of staff, the parent survey asked parents if they agreed that the initial evaluation(s) conducted by GPS were comprehensive and addressed their child's needs. Overall, 62 percent of parents agreed, with variances at the Pre-K (91 percent), elementary school (66 percent), middle school (57 percent), and high school (57 percent) levels. This response tracks comments, such as those above, provided by focus group participants.

Exhibit 27. Parent Survey: The initial evaluation(s) conducted by GPS were comprehensive and addressed my child's needs.



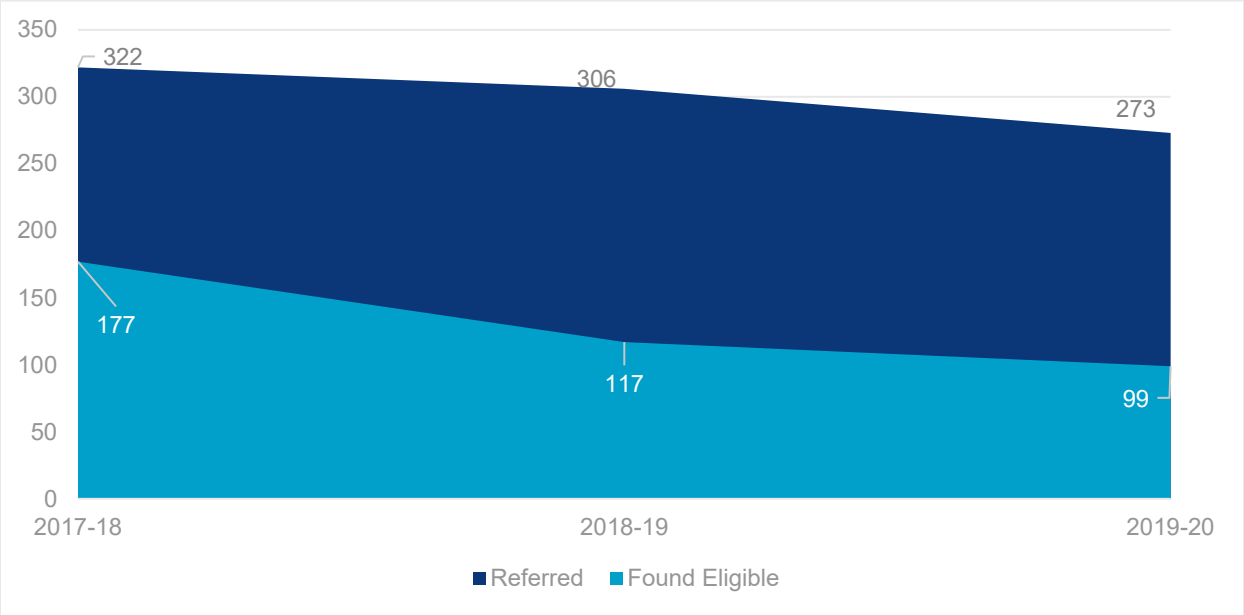
Special Education Referral and Eligibility

This section analyzes overall referral and eligibility data, along with trends disaggregated by specific student populations.

Overall Special Education Referral and Eligibility Trends

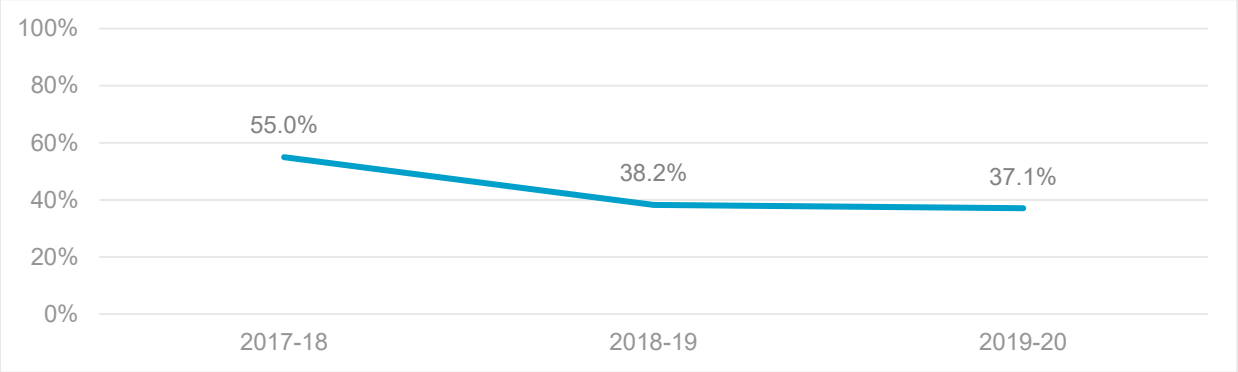
Between 2017-18 to 2019-20, the overall number of referrals for special education evaluation decreased (from 322 to 273). Following a similar trend, the number of students found eligible for special education services also decreased (from 177 to 99).

Exhibit 28. Number of GPS Students (Ages 6-21) Referred for Special Education Evaluation, 2017-18 to 2019-20



Similarly, the percentage of students found eligible for special education after an evaluation decreased from 55 percent in 2017-18 to 37.1 percent in 2019-20.

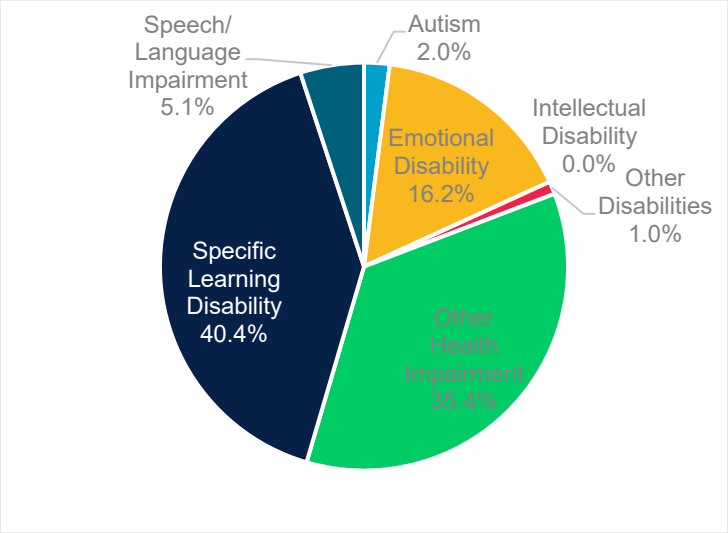
Exhibit 29. Percent of GPS Students Evaluated and Found Eligible for Special Education Services, 2017-18 to 2019-20



Special Education Referrals by Primary Disability

Of the evaluated students found eligible for special education, 40.4 percent were identified with a specific learning disability, 35.4 percent were identified with a health impairment, 16.2 percent were identified with an emotional disability, and 5.1 percent were identified for a speech or language impairment.

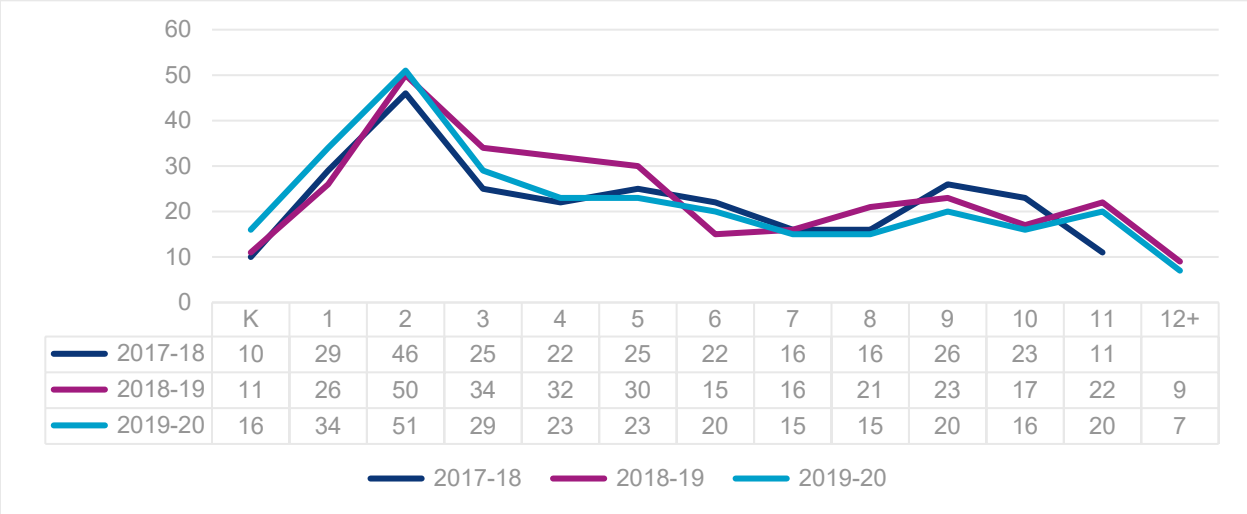
Exhibit 30. Percent of Students Found Eligible for Special Education Services by Primary Disability, 2019-20



Special Education Referrals by Grade

Between the 2017-18 and 2019-20 school years, students enrolled in grades 1-5 accounted for the largest percentage of students referred for special education evaluation. Second-grade students accounted for the largest percentage of students referred for special education evaluation in a single grade during that same period. In 2019-20, second-grade students accounted for 17.6 percent of students referred for special education evaluation. Students from grade 6 through 12 accounted for a smaller percentage of students referred for a special education evaluation.

Exhibit 31. Number of Students (K-12) Referred for Special Education Evaluation by Grade, 2017-18 to 2019-20 [37]



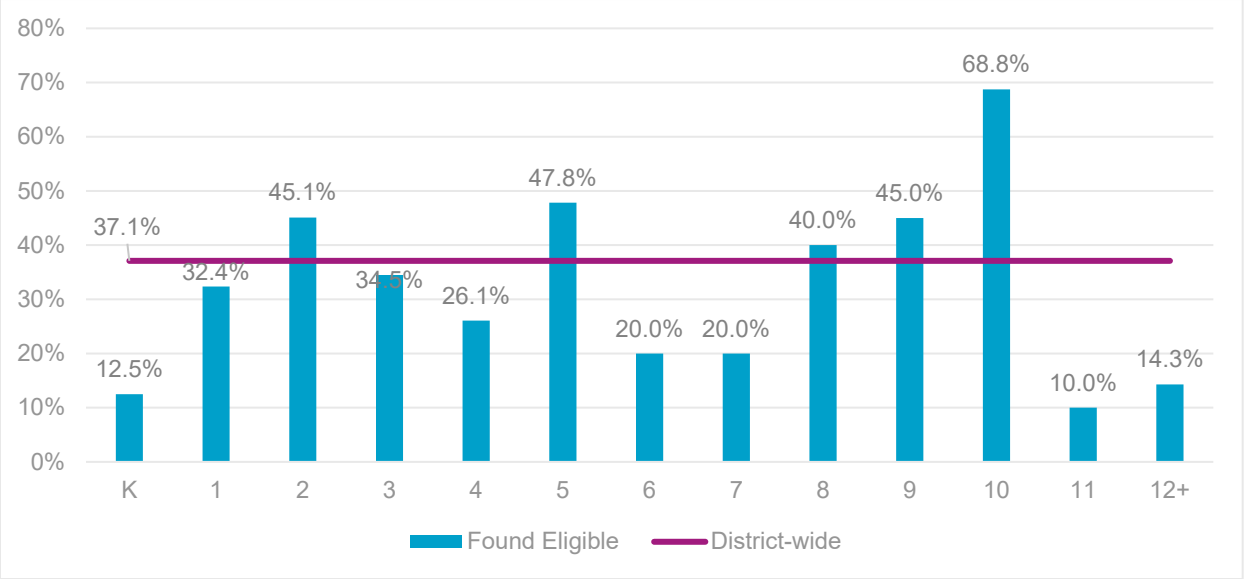
	K	1	2	3	4	5	6	7	8	9	10	11	12+
2017-18	10	29	46	25	22	25	22	16	16	26	23	11	
2018-19	11	26	50	34	32	30	15	16	21	23	17	22	9
2019-20	16	34	51	29	23	23	20	15	15	20	16	20	7

Overall, 37.1 percent of students in grades K-12 who were referred for special education and evaluated were found eligible. The following grades had higher rates of initial eligibility findings compared to the all-

[37] Data for referrals for grade 12+ suppressed due to n<5

district rate: Grade 2 (45.1 percent), Grade 5 (47.8 percent), Grade 8 (40.0 percent), Grade 9 (45.0 percent), and Grade 10 (68.8 percent).

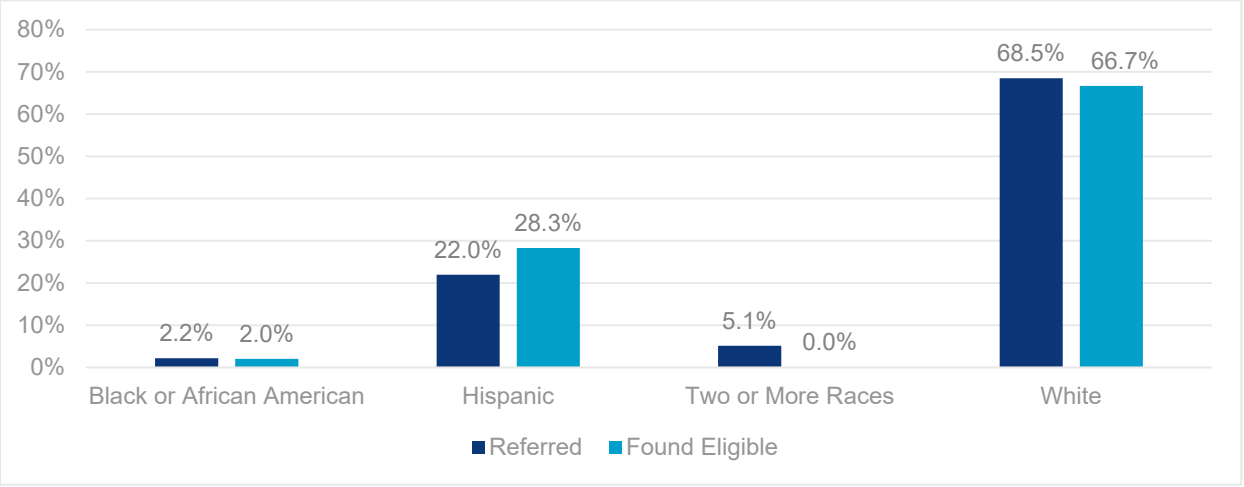
Exhibit 32. Percent of Students (K-12) Referred and Found Eligible for Special Education Services by Grade, 2019-20



Special Education Referrals by Race/Ethnicity

Of students referred for a special education evaluation, 68.5 percent were white, 22.0 percent were Hispanic, 5.1 percent were two or more races, and 2.2 percent were Black or African American. Of the students found eligible for special education services, 66.7 percent were white, 28.3 percent were Hispanic, and 2.0 percent were Black or African American. These data do not reflect any significant disparities between referral and eligibility by race/ethnicity.

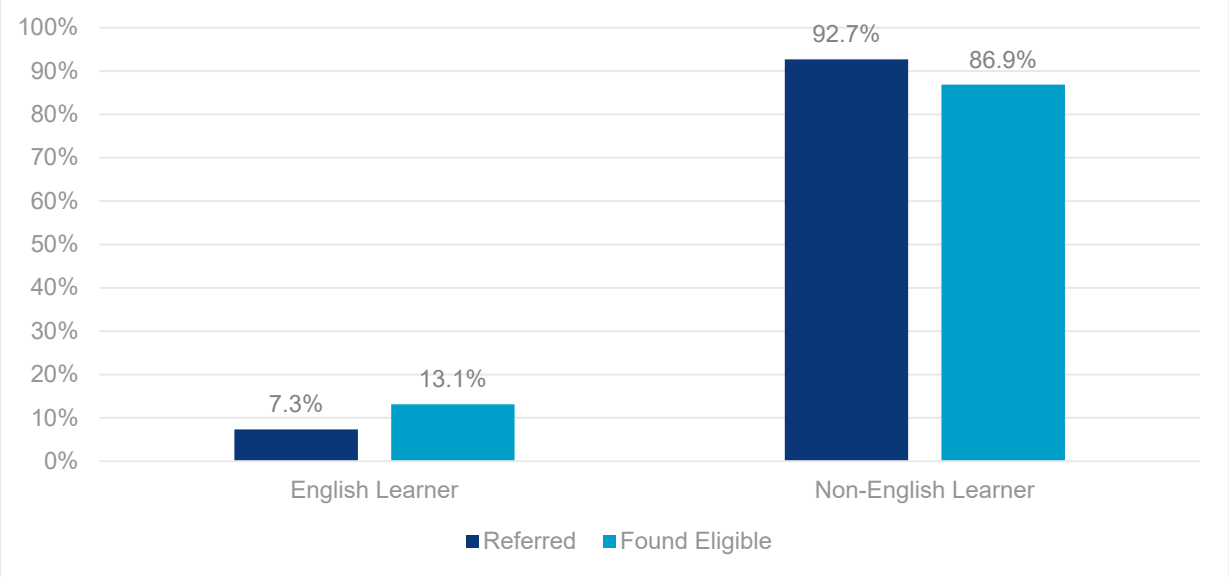
Exhibit 33. Percent of GPS Students (K-12) Found Eligible for Special Education by Race/Ethnicity, 2019-20



Special Education Referrals by English Learner Status

Of students referred for a special education evaluation, 7.3 percent were English learners, and 92.7 percent were non-English learners. Of the students who were found eligible for special education services, a higher 13.1 percent were English learners compared to 86.9 percent non-English learners.

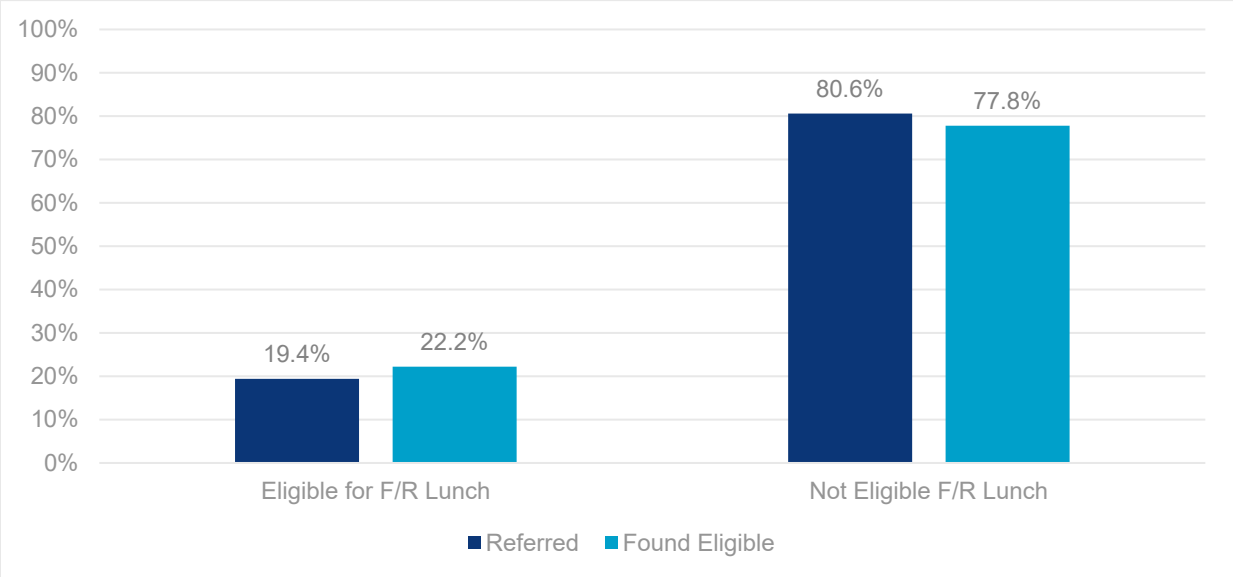
Exhibit 34. Percent of GPS Students (K-12) Found Eligible for Special Education by EL Status, 2019-20



Special Education Referrals by Free or Reduced Lunch Status

In 2019-20, 19.4 percent of students referred for a special education evaluation were eligible for free or reduced lunch, compared to 80.6 percent of students not eligible for free or reduced lunch. Of the students found eligible for special education services, a fairly comparable 22.2 percent were eligible for free or reduced lunch, and 77.8 percent were not eligible.

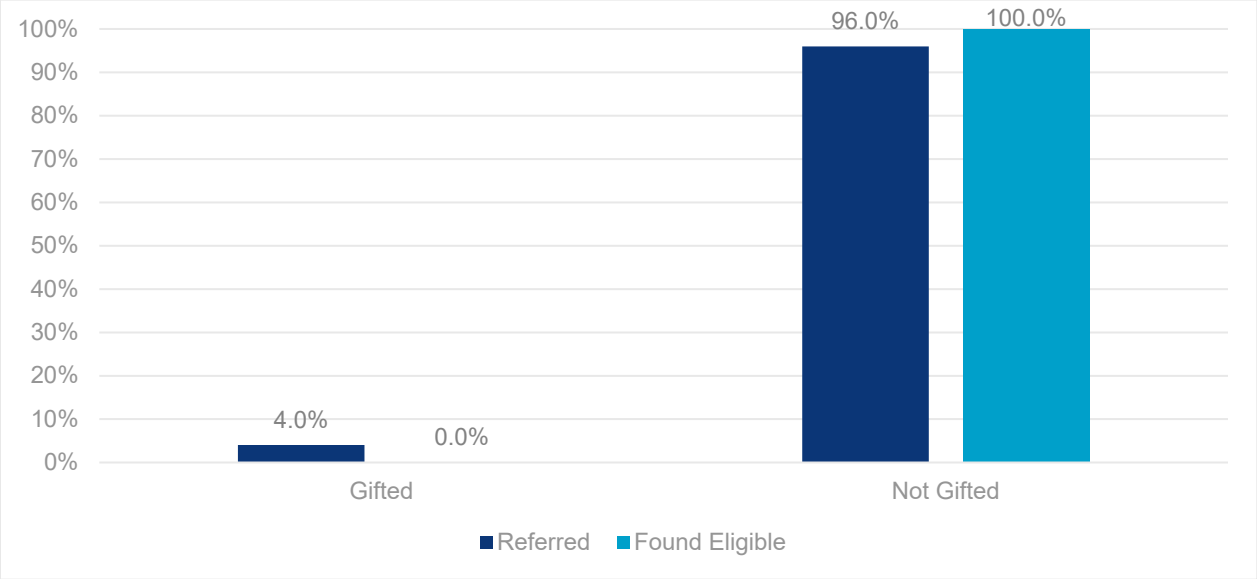
Exhibit 35. Percent of GPS Students (K-12) Referred and Found Eligible for Special Education by Free or Reduced Lunch Status, 2019-20



Special Education Referrals and Eligibility by Gifted Status

Of students referred for special education evaluation, 4 percent were identified as gifted and 96 percent were not identified as gifted. In 2019-20, there were no students who were identified as gifted who were found eligible for special education.

Exhibit 36. Percent of GPS Students (K-12) Referred and Found Eligible for Special Education by Gifted Status, 2019-20



Individualized Education Program Development

According to Connecticut regulations, following the determination that a child is eligible for special education services, an IEP must be created by the Pupil Personnel Team (PPT). A student's IEP contains several sections; however, among the most important of those sections are the IEP goals. Annual IEP goals that are ambitious, relevant, and measurable are an extraordinarily vital 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."[38]

High-Quality IEPs to Support High-Quality Special Education Services

The importance of well written IEPs recently came to light in the recent U.S. Supreme Court case of *Endrew F. v. Douglas County School District*.[39] As referenced earlier in this report, in this decision, the Supreme 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 each student to make academic progress and functional advancement and advance from grade to grade. The IEP need not aim for grade-level advancement if that is not a reasonable prospect. However, the IEP must be appropriately ambitious given 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 opportunity to meet challenging objectives. The Supreme Court made it clear that IDEA demands more.

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

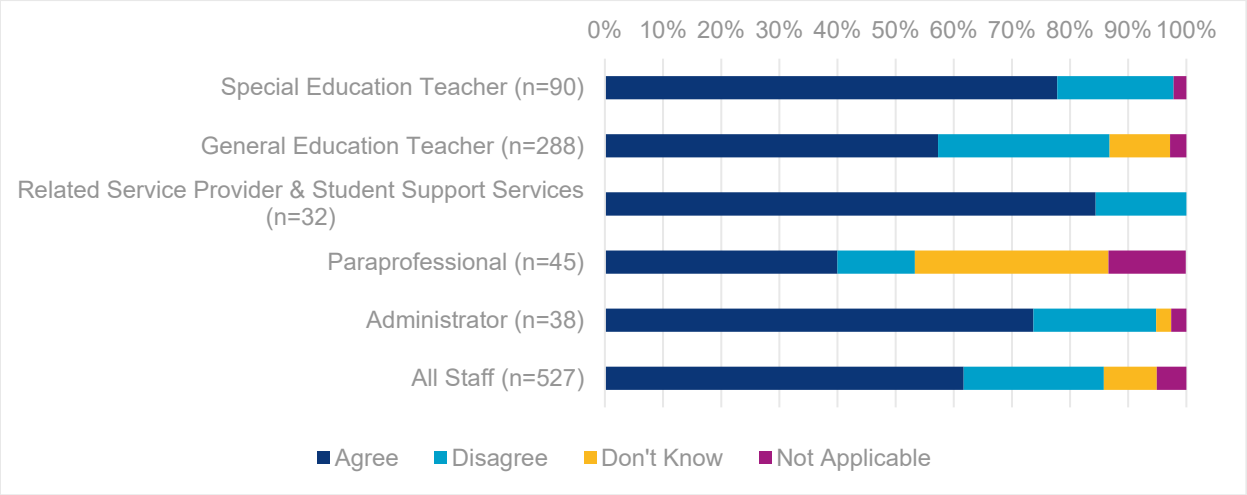
Overall PPT Process

Focus group participants, including those in file review focus groups, noted the following challenges regarding the PPT process:

- "It's a point of frustration. There is a GPS process that they must follow as it relates to how parents are involved in the development of IEPs. Some schools are following the process, some are not. We asked the special education director to issue a 1-pager on the process and make a video to push out to all schools regarding policies of IEP development."
- "When you hear common threads, you think there must be something to it. IEP development was one of those frustration points. There is a Greenwich process that we are to follow: work on the draft IEP, call the parent 5 days before, so that when they get to the PPT meeting they're on the same page. We have different buildings following different processes. We'll have a parent say 'my ppt is tomorrow, and there's been no other outreach.' There is a lack of follow through and process being followed."

In the GPS staff survey, staff were asked to agree or disagree with the following statement: "The PPT team discusses instruction and support in general education classes to the maximum extent possible when making service recommendations for students with disabilities." Almost 80 percent of special educators, but less than 60 percent of general education teachers, agreed with that statement.

Exhibit 37. Staff Survey: The PPT team discusses instruction and support in general education classes to the maximum extent possible when making service recommendations for students with disabilities.



In the qualitative response section of the staff survey, teachers responded with differing perspectives:

- "We are incredibly understaffed in the special education area. I have 3 special education students in my class and 2 of them are not seen by the special ed teacher because he is needed elsewhere. IEPs are not being followed and parents have no idea."
- "Our assistant principal tries to work around IEP accommodations by putting special ed students together in the same class so she can say they are being serviced together even if they are not. I don't believe our assistant principal does a good job explaining to parents the IEPs and the evaluation process. She assumes they are aware of all the process and rushes through things that need to be delicately handled with these families."

During file review focus groups, it was shared that investing time with parents ahead of the meeting makes the IEP process smoother. In particular, staff shared that the Facilitated IEP training they received, which

occurred over three days, was valuable in supporting the importance of parent information, staff participation, and the overall facilitation of effective PPT meetings.

Staff also cited the IEP Boot Camp as another valuable training in supporting consistent operating procedures around the creation of IEPs.

Although specific trainings were noted by staff to be beneficial, it was also shared during focus groups that inconsistent processes between schools and among grade levels within schools sometimes leads to additional complications among staff and/or parents in the creation of IEPs. As shared below, staff noted a desire to have standard operating procedures (often referring to them as checklists) around each aspect of the IEP. The District does have a standard operating procedure manual, known as the Red Book, that is either unknown or known but not utilized by some staff.

Present Levels of Performance Statement in the IEP

Within a student's IEP, the Present Levels of Performance (PLOP) serves as the starting point for developing IEP goals. The PLOP 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 PLOP statement incorporates input from a variety of educators and school staff and involves both qualitative and quantitative data, including:

- Performance and mastery of previous 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 student 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.

As appropriate, PLOP statements must include data describing a student's functional skills as well as academic skills. Research has shown that when functional skills are not addressed within the PLOP, students' long-term independent-living outcomes are diminished.[40] In addition, the PLOP statement should provide information related to all goals that are developed within the IEP. For example, a 14-year-old student's IEP should include transition goals rooted in baseline transition data that is clearly detailed in the PLOP. Members of the IEP team must document and update a student's PLOP annually. In doing so, IEP teams must consider relevant data. PPT 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.

During file review focus groups, IEP monitors shared that they feel confident supporting the PPT in creating useful PLOP statements; however, they noted they receive conflicting written guidance from the Special Education Office on specific elements and data to include within the PLOP. For example, many staff expressed frustration over conflicting guidance regarding the use of STAR assessment data – some noted STAR data could no longer be included in the PLOP, while others stated it could.[41] File review focus group participants also noted conflicting information received from the Director of Special Education and Assistant

[40] In 2011, Auers, Lowrey, Douglas, and Sievers analyzed 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.
[41] STAR formerly was an acronym for the Standardized Tests of Achievement in Reading; however, it no longer uses that name.

Principals who supervise special education within their buildings. Although the District's Red Book references the creation of PLOP statements, none of the staff referred to it during the focus groups.

Staff also shared concerns regarding the overall use of data to inform the IEP, specifically related to the development of the PLOP statement and IEP progress reports. Many IEP monitors reported that the use of data to inform the IEP process is inconsistent, often because the data collection itself is inconsistent. In particular, several IEP monitors shared that they keep multiple binders of written student data but do not have an electronic repository to house the data. Relying on paper files, they shared, is especially cumbersome when the data is needed for PPT meetings, IEP development, and IEP progress reporting.

IEP Goals

Annual IEP goals that are ambitious, relevant, and measurable are a vital part of the IEP process. Considering the *Endrew* case, when developing IEP goals, teams should ensure the goals are grade-appropriate and ambitious. Repeating the same goals from year to year does not meet this standard. Rather, IEP teams must 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 that also meet other educational needs related to their disability. Although the Supreme Court did not address IEP delineation of 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."[42]

During file review focus groups, IEP monitors and PPT members were cognizant of creating SMART IEP goals that are **S**pecific, **M**easurable, **A**ttainable, **R**elatable, and **T**ime-bound. At the same time, IEP monitors and PPT members shared frustration about creating goals that meet the needs of the student in the least restrictive environment. Throughout many file review focus groups, participants expressed that educational settings in GPS are either too restrictive or not supportive enough, thus forcing IEP goals to be influenced more by available settings and less by student need.

Accommodations in the IEP

IEP accommodations should facilitate access to multiple means of acquiring knowledge and multiple methods of demonstrating skills (aligning to principles of Universal Design for Learning) while also retaining the rigor and high expectations of the Connecticut State Standards.

Providing accommodations to students with disabilities on assignments or assessments maintains the same expectation of mastery as that of nondisabled peers, but with a change in the timing, formatting, setting, scheduling, and/or response or presentation method. Accommodations do not alter in any significant way what a test or assignment measures.[43]

During file review focus groups, staff shared they feel confident selecting appropriate accommodations to include in the IEP but also noted an increased desire to have data that confirms whether students are consistently using the accommodations and/or if teachers are consistently offering the accommodations as required by the IEP.

During parent focus groups and in anonymously submitted parent emails, many parents shared they feel they cannot trust the PPT to advocate for and support implementation of appropriate accommodations in their child's IEP. This was especially true among parents who shared their belief that children who may be twice exceptional do not have equal access to advanced classes and the accommodations that might be

[42] Retrieved from https://sites.ed.gov/idea/regs/b/d/300.320/a
[43] Retrieved from: https://www.ctdinstitute.org/sites/default/files/file_attachments/School%20Accommodation%20and%20Modification%20Ideas%20for%20Students%20who%20Receive%20Special%20Education%20Services%20English.pdf

necessary to succeed in the Advanced Learning Program (ALP), honors, or advanced courses may not be offered.

Meaningful IEP Progress Reporting

IDEA requires IEP teams to develop annual measurable academic and/or functional IEP goals that are aligned to state standards. Each IEP goal should include benchmarks or short-term objectives as well as criteria to measure goal mastery and must address needs resulting from the student's disability in order for the student to be involved in and progress in the general education curriculum. As stated earlier, we recommend that IEP goals be written using the SMART format -- **S**pecific, **M**easurable, **A**chievable, **R**elevant, and **T**ime-bound. The purpose of developing SMART IEP goals is to support the measurement of student progress toward goal mastery.

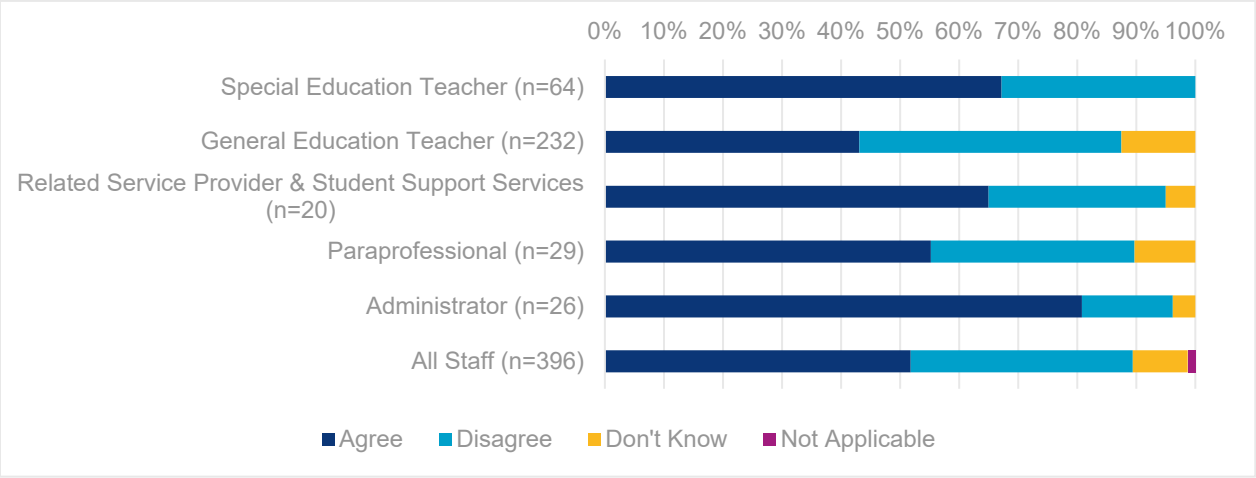
Progress monitoring is a research-based practice used to assess a student's progress toward IEP goals and evaluate the effectiveness of instruction and intervention. Progress monitoring informs the teacher, student, and family regarding what a student has learned and what requires additional intervention or still needs to be taught. IDEA requires IEPs to contain a description of how the student's progress will be measured and how often reports on progress will be provided.

During file review focus groups, GPS staff shared challenges with acquiring and analyzing student data in a way that is useful for updating the PLOP as well as generating progress reports. One staff member shared they use their own personal funds for an electronic data collection tool so they can more easily access and use data for progress reporting purposes.

Staff consistently noted that they are required to include quantifiable data within student progress reports. IEP monitors additionally shared they have been informed by the Special Education Department that this is required. This requirement is commendable. A focus group participant shared: "From the progress monitoring standpoint they have screeners, running records, etc., however they don't have a systemic focus – most people are looking at progress monitoring as the responsibility of reading/math interventionist and general education teacher – not special education."

In the GPS staff survey, staff were asked to agree or disagree with the following statement: "Student progress toward IEP goals is analyzed and discussed regularly by his/her teachers and/or related service provider(s)." More than 67 percent of special education teachers agreed with the statement, while approximately 43 percent of general education teachers agreed.

Exhibit 38. Staff Survey: Student progress toward IEP goals is analyzed and discussed regularly by his/her teachers and/or related service provider(s).

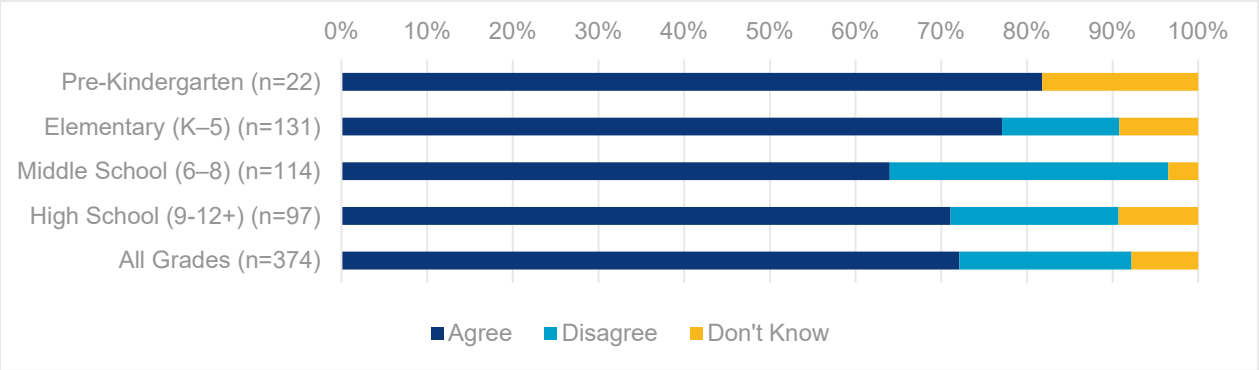


The following qualitative responses regarding student progress were shared during the staff survey:

- "Our school works very hard as a team to develop a strong IEP. We work hard to implement the program and make sure each student makes progress."
- "All services are being delivered and progress is noted in most cases."

Surveyed parents were asked if they agreed with the following statement: "I receive formal IEP progress reports that indicate how my child is meeting their IEP goals. Across all grade levels, 72 percent of parents agreed with the statement.

Exhibit 39. Parent Survey: I receive formal IEP progress reports that indicate how my child is meeting their IEP goals.



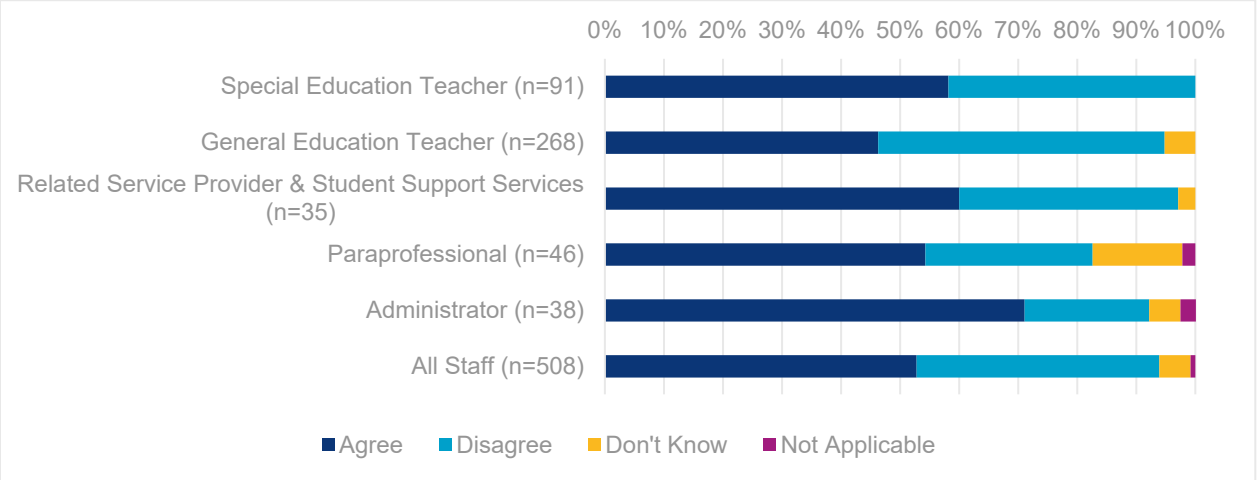
The following comment was shared from a focus group:

- "From progress monitoring standpoint they have screeners, running records, etc., however they don't have a systemic focus – most people are looking at progress monitoring as the responsibility of reading/math interventionist and general education teacher – not special education."

PPT Collaboration

In the GPS staff survey, staff were asked to agree or disagree with the following statement: "Staff in my building(s) have an effective process by which they collaborate with each other regarding the needs of students with disabilities." A higher rate of special education teachers (58 percent) than general education teachers (48 percent) agreed with that statement.

Exhibit 40. Staff Survey: Staff in my building(s) have an effective process by which they collaborate with each other regarding the needs of students with disabilities.

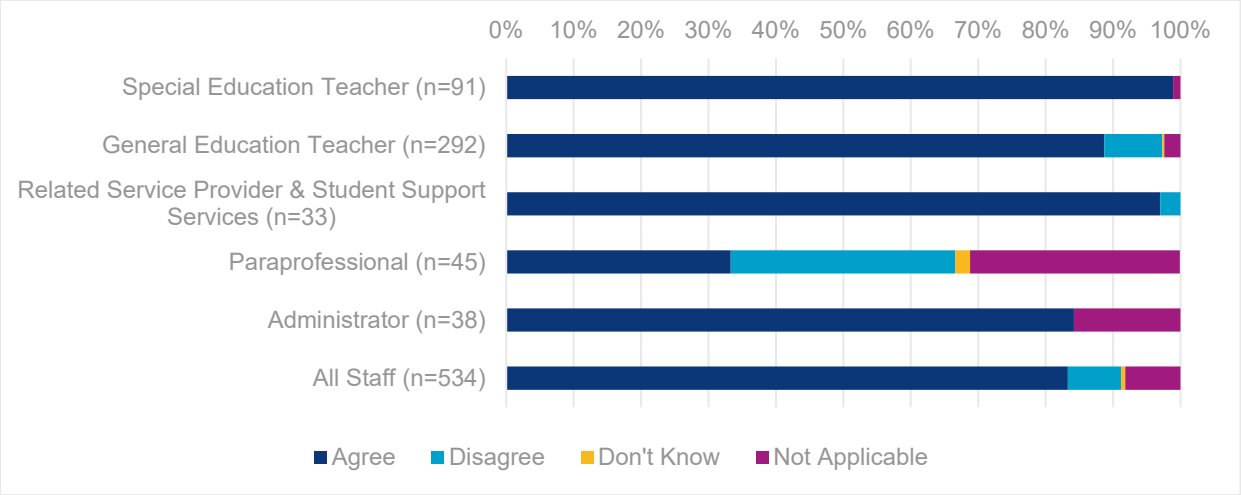


The following qualitative responses regarding IEP team collaboration were shared during the staff survey:

- "We need improved collaboration with staff regarding decision making such as class placement; shorter instructional periods but with more one-to-one teacher support (which has been hindered by the extremely large class size of students with special needs)."
- "We need more time placed on collaboration between general education/special education teachers. This has definitely improved over the years I have been here, but there is room to grow."
- "The special education staff seems to have a different set of rules and are favored quite a bit, which makes collaboration among sped/general teachers difficult."
- "Provide specific time for collaboration between classroom teacher and Special Ed. teacher."
- "There needs to be consistent collaboration between SPED and general ed teachers. In PPTs the SPED team makes promises to parents that they are working with the general ed teacher and that is not the case. The SPED team is spread thin and does not have time built into the schedule to work collaboratively with classroom teachers. Also, where there are subs in SPED, they do not follow the IEP properly."
- "There is little to no collaboration with essential area teachers. Follow through is lacking. A special education teacher's interpretation of a special education student's scores is not always in line with that of the classroom teacher (i.e., inflated reading scores)."
- "We need more collaboration between Gen Ed and SPED. I feel like Gen Ed teachers are told what will happen and are not a strong voice in the actual decision making."
- "Collaboration between SPED teachers, Paraprofessionals, and Gen Ed teachers."
- "More time for modification of curriculum and collaboration between paras, gen ed and sped."
- "Better collaboration amongst the team, such as team meetings more frequently than just a PPT."
- "No collaboration time is given to special education teachers and related services at the high school. We often communicate on the fly (hallways or quick phone call in between blocks)."

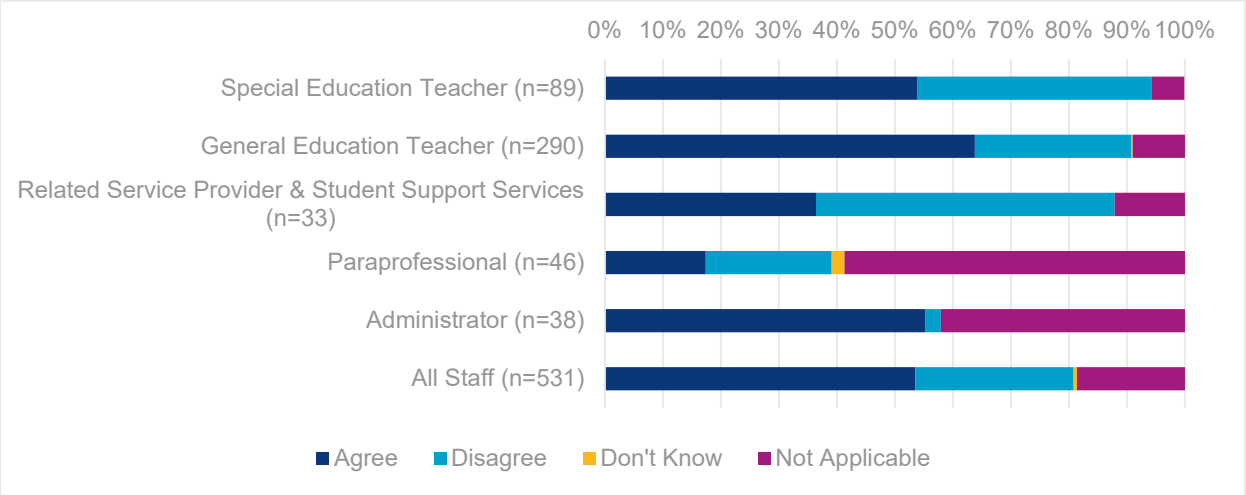
In the GPS staff survey, staff were asked if they have been invited to participate in PPT meeting(s). Close to 100 percent of special education teachers and 89 percent of general education teachers indicated they had been invited to participate in PPT meeting(s).

Exhibit 41. Staff Survey: I have been invited to participate in PPT meeting(s).



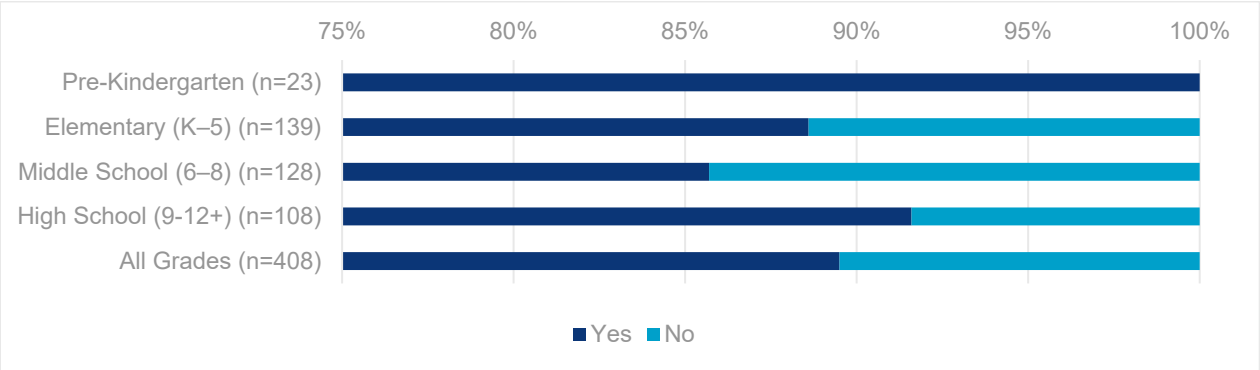
In the GPS staff survey, staff were asked to agree or disagree with the following statement: "I am given adequate time/coverage when participating in PPT meeting(s)." Just over half (54 percent) of staff agreed with the statement.

Exhibit 42. Staff Survey: I am given adequate time/coverage when participating in PPT meeting(s).



Parents were asked to respond to a similar statement on their survey. Ninety percent of parents agreed with the statement: "I was provided adequate time to review these [IEP] materials prior to my child's PPT meeting."

Exhibit 43. Parent Survey: I am provided adequate time to review these [IEP] materials prior to my child's PPT meeting.



Information gathered from parent focus groups on PPT collaboration indicates a great deal of mistrust toward the overall process. Comments from parents during focus groups included:

- "Delay, delay, delay, and deny. Many families don't speak up because of retaliation. Constantly having to review what is written into the IEP. Parent ignorance of the process – GPS has mastery and command of all of the details (necessary gates, timings, words) that a required to approve or deny children access to special ed services."
- "Shouldn't be dependent on parents to have to hire lawyers to get services for their child. The process should be done in a collaborative way. The special education system is built around those that can afford a lawyer to get services. They are throwing good money after bad."

Continuum of Services for Students with Disabilities

As stated earlier, IDEA requires students with IEPs to receive a Free and Appropriate Public Education (FAPE) in their Least Restrictive Environment (LRE) to meet their needs. In order for districts to improve the academic achievement and reduce the achievement gap of students with disabilities, as compared to nondisabled peers, they must be included in the core curriculum and receive targeted, evidence-based interventions that are implemented with fidelity.

Each district must offer a continuum of services ranging from regular classes with special education support to arrangements for residential placement. IEP placement decisions are to be based on each student's individualized needs rather than service availability or preset arrangements with no flexibility. According to a recent paper on this matter by the IRIS Center at Vanderbilt University:

> *Placement options are fluid. A student might receive some services in one setting and other services in a different setting. Further, placements can change over time based on factors such as changes in a student's progress or needs. For some students, the general education classroom is not necessarily the least restrictive setting.*[44]

As stated previously, students with IEPs are required to receive special education services in the least restrictive environment based on their needs, whether that is a general education classroom, a special education classroom, a special school (either within or outside of the school district), homebound instruction, or in a hospital or residential setting. It is important to note that student placement should never be based solely on the student's identified disability (i.e., a student who has been identified as having an intellectual disability should not automatically be placed in a self-contained/separate classroom).

Continuum of Services in GPS

Based on classroom visits conducted by PCG as well as interviews and focus groups, the continuum of special education services in GPS appears to lack clarity. During file review focus groups, staff shared frustrations that classes are either "too restrictive" or not supportive enough. The most significant findings included:

- Some classes that are labeled as "inclusive" are actually made up primarily of students with IEPs;
- The option for co-teaching exists in only a small number of classrooms at the middle school level and is dependent on the determination of the building administration;
- A consultative model for special education exists somewhat as an Academic-Lab Class with an associated special education teacher, within the middle schools and high schools but the model's operation is unclear; and
- Some inclusive general education classrooms have limited special education teacher support than is necessary to meet the needs of students in those classes.

Through information obtained from administrators and teachers, the PPS Office at GPS has prided itself over the past 20 years on providing a continuum of services that promotes inclusive educational settings for students with disabilities. To that end, District administrators shared that GPS has intentionally shied away from creating programs that "label students." Instead, administrators note they have made a concerted effort to provide special education services in settings with general education peers.

In contrast, information gathered through interviews, focus groups, and direct classroom visits indicates the District has not engaged in teaching strategies that support robust inclusive programming. In particular, the

[44] https://iris.peabody.vanderbilt.edu/wp-content/uploads/pdf_info_briefs/IRIS_Least_Restrictive_Environment_InfoBrief_092519.pdf

District leverages a collaborative teaching model, known within GPS as Academic Labs, that does not adhere to best practices in promoting partnership between general education and special education teachers. The implementation of Academic Labs has, especially in the middle and high schools, contributed to learning environments that are inclusive in name, but, have a disproportionately high number of students with IEPs and 504 plans. Additionally, the Academic Labs are led by general education instructors who are not trained to support the needs of students with disabilities. Without other options, GPS is compromising its continuum of services.

Furthermore, the District has designated a specific label – "comprehensive" – for students with low incidence disabilities. Several times, throughout almost all interviews and focus groups, PCG repeatedly noted administrators and staff describing students as "comprehensive," "very comprehensive," or "mildly comprehensive." Districtwide use of the label is ambiguous – some use it as a term to describe the number of hours a student receives special education services. Others use it as an adjective to describe the student's need. Nevertheless, the inconsistent use of the term and its use to label students is potentially stigmatizing.

In addition, the District has created programming for "comprehensive" students in what are often referred to as the "comprehensive classrooms" and sometimes referred to as "resource rooms." In these settings, students with low incidence disabilities learn together with small student-to-teacher ratios. District administrators have rightfully rejected the creation of programs that "label students," but in taking this stance, it has not created a sufficient structure to provide consistent support for students with unique learning needs. During focus groups and interviews, teachers who previously worked in other districts or were trained in specific programs often shared frustrations that GPS's programming undervalues the need to have staff and/or programs that meet the specific learning needs of students with low incidence disabilities (e.g. autism).

Achievement Outcomes for School-Aged Students with IEPs

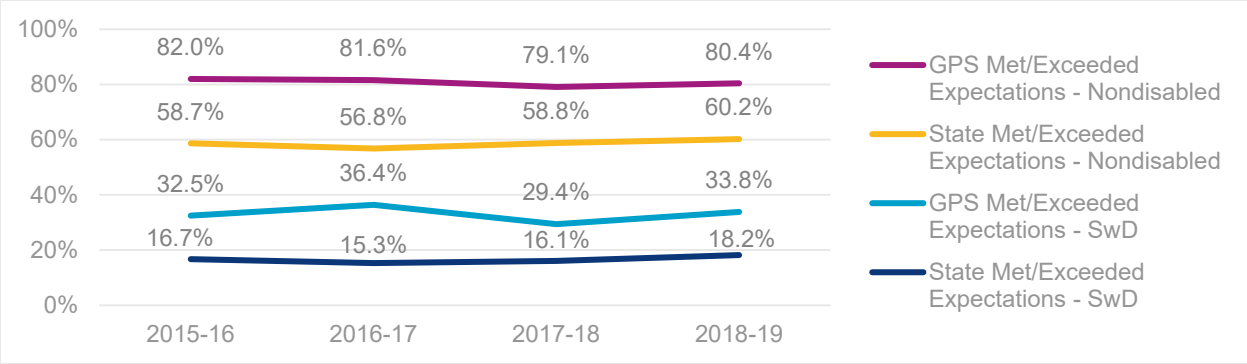
This section provides a longitudinal analysis of student outcomes on the Smarter Balanced learning assessments in English Language Arts/Literacy (ELA/Literacy) and in Mathematics for grades 3 and 5. The exhibits compare state averages to the percentage of GPS students, with and without IEPs, who met or exceeded expectations on the assessment, documenting the achievement gap over time.[45]

English Language Arts/Literacy

Grade 3. Between the 2015-16 and 2018-19 school years, GPS students with IEPs performed above the state average of students with disabilities. During this time, the percentage of GPS students with IEPs who met or exceeded expectations was 16 points higher than the state average for students with disabilities. When compared to nondisabled peers, the percentage of GPS students with IEPs who met or exceeded expectations was, on average, 47 points lower.

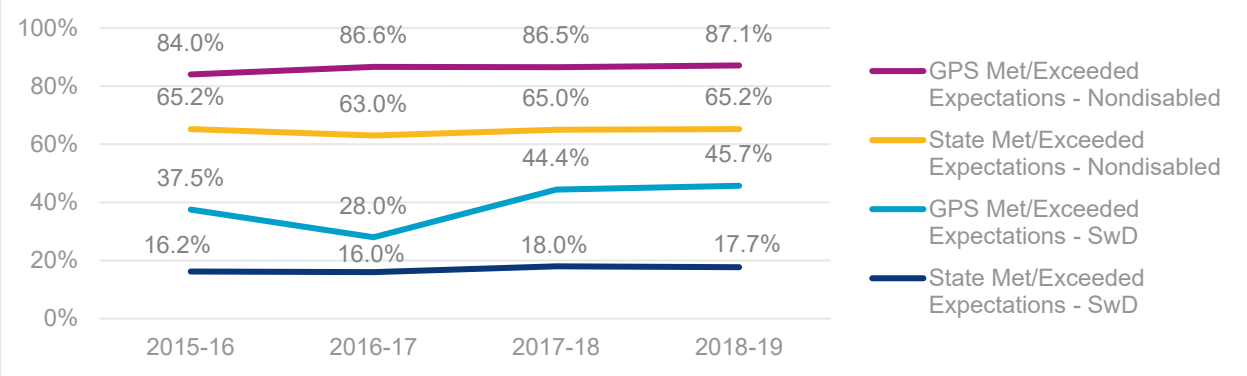
[45]Smarter Balanced scores obtained from EdSight: http://edsight.ct.gov/SASPortal/main.do

Exhibit 44. Grade 3 ELA/Literacy, 2015-16 to 2018-19



Grade 5. Similar to trends in the grade 3 data, the percentage of GPS students with IEPs who met or exceeded expectations on the grade 5 ELA/Literacy assessment was above the overall state rate for students with disabilities. Between the 2016-17 and 2017-18 school years specifically, the percentage of GPS students with disabilities who met or exceeded expectations increased by 16 points. When compared to nondisabled peers, the percentage of GPS students with IEPs who met or exceeded expectations on the grade 5 ELA/Literacy assessment was significantly lower. The three-year average gap between students with IEPs and nondisabled students in GPS was 47 percentage points.

Exhibit 45. Grade 5 ELA/Literacy, 2015-16 to 2018-19

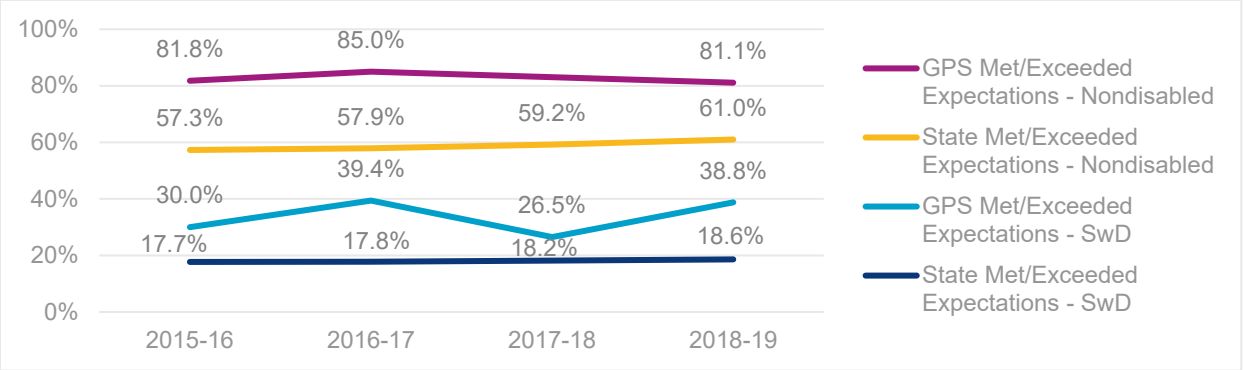


Mathematics

The percentage of GPS students with IEPs who met or exceeded expectations on the grade 3 mathematics assessment was higher than the state average for students with disabilities, reaching a 20-percentage point difference in 2018-19. Yet, between 2016-17 to 2017-18, the percentage of GPS students who met or exceeded expectations decreased by almost 13 percentage points. Compared to their nondisabled peers, a smaller percentage of GPS students with IEPs met or exceeded expectations. The average achievement gap between GPS students with disabilities and those without disabilities was 46 percentage points.[46]

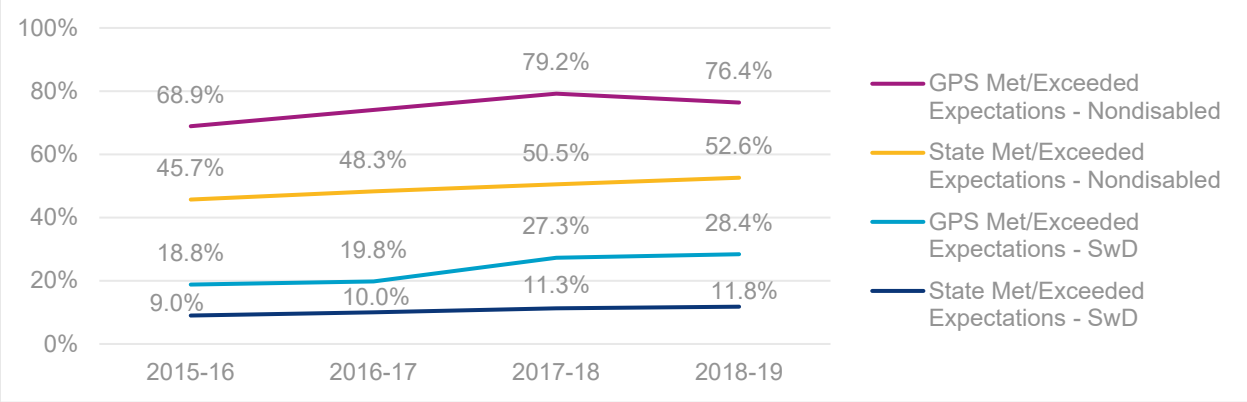
[46] Connecticut State Department of Education suppressed data for nondisabled GPS students for 2017-18.

Exhibit 46. Grade 3 Mathematics, 2016-17 to 2018-19



Grade 5. Between the 2015-16 and 2018-19 school years, the percentage of GPS students with IEPs who met or exceeded expectations on the grade 5 mathematics assessment was higher than the state average for students with disabilities. Specifically between the 2016-17 and 2017-18 school years, the percentage of students with IEPs who met or exceeded expectations increased by 7.5 points. Compared to nondisabled peers, the percentage of GPS students with IEPs who met or exceeded expectations was significantly smaller. Between the 2015-16 and 2018-19 school years, the overall achievement gap between GPS nondisabled students and students with IEPs was 50 percentage points.

Exhibit 47. Grade 5 Mathematics, 2015-16 to 2018-19



Achievement Outcomes for Early Childhood Students with IEPs

One of the indicators in Connecticut's State Performance Plan relates to the achievement of young children with disabilities in three areas: 1) appropriate behavior, 2) acquisition and use of knowledge and skills, and 3) positive social/emotional skills. In each of these three areas, calculations are made on the percentage of children in the following two groups: (1) children who entered an early childhood program below developmental expectations for their age but who have substantially increased developmentally by age six when they exit a program, and (2) children who entered an early childhood program functioning within expectations by age six or meeting those expectations by the time they exit the program.

Summarized below are GPS performance ratings in three categories for each of the two reported areas (substantially increased skills and functioning within standards). The figures show the percentages of children meeting standards compared to state targets. An analysis of these data follows the exhibits.

Exhibit 48. Outcomes for Preschool Students with Disabilities: Indicator 7a - Positive social-emotional skills (including social relationships). GPS and State Targets, 2016-17 to 2018-19

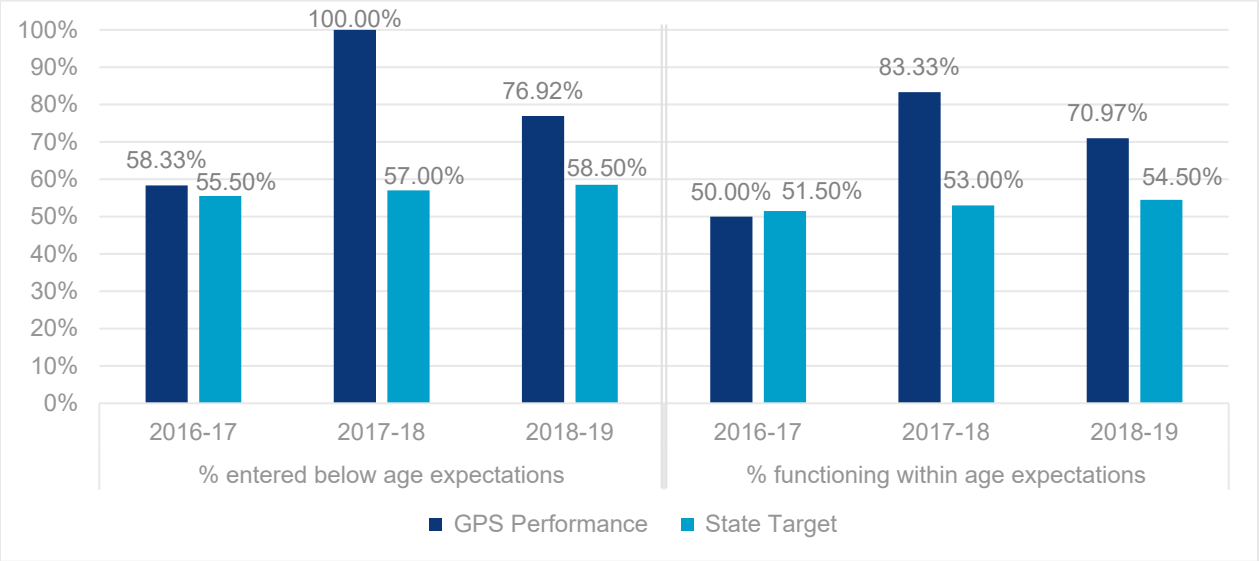


Exhibit 49. Preschool Outcomes: Indicator 7b - Acquisition and use of knowledge and skills (including early language/communication and early literacy). GPS and State Targets, 2016-17 to 2018-19

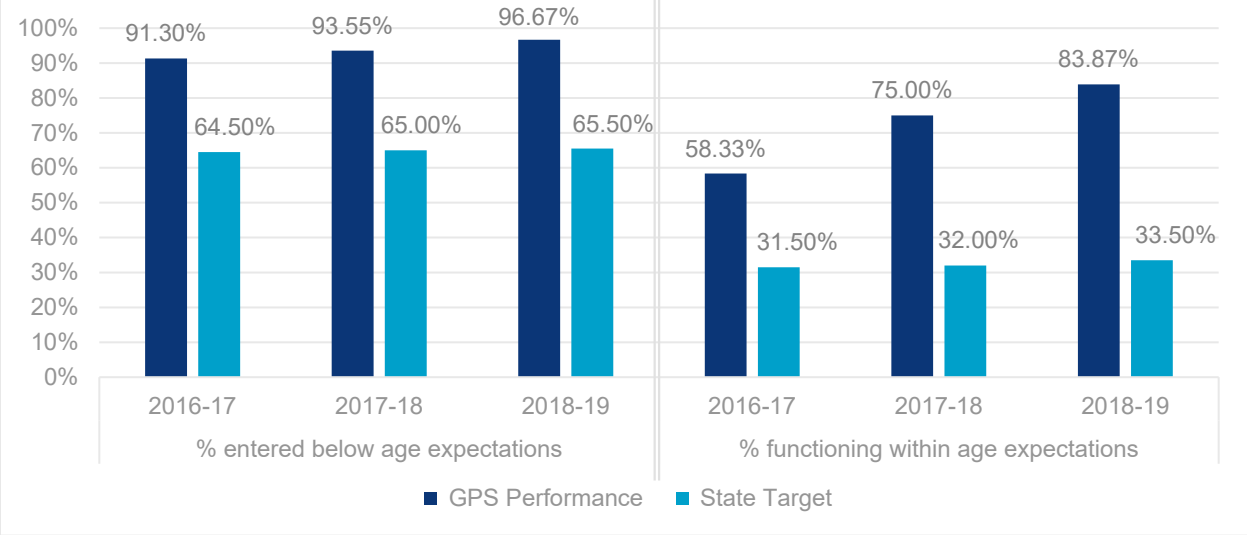
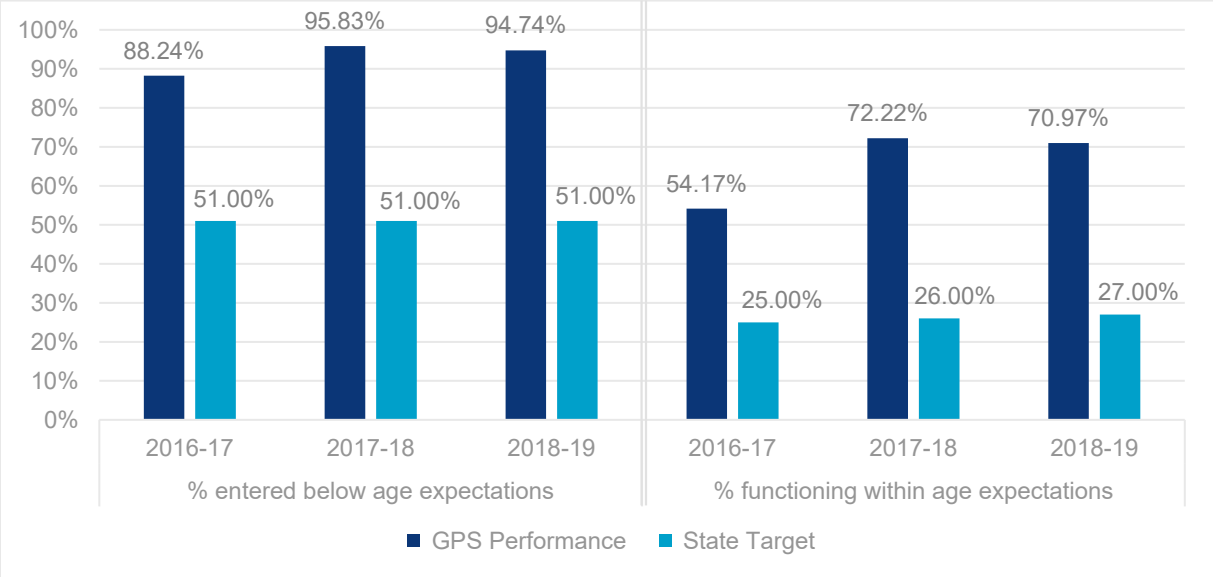


Exhibit 50. Preschool Outcomes: Indicator 7c - Use of appropriate behavior to meet their needs. GPS and State Targets, 2016-17 to 2018-19



Substantially Increased Skills

The following data compare 2018-19 state targets with the rates of GPS children who entered an early childhood program below developmental expectations for their age but who substantially increased developmentally by age six when they exited the program, based on the state's SPP report:

- **Positive Social/Emotional Skills.** 76.92 percent of GPS students met standards (18 percent higher than the state's target).
- **Acquisition/Use of Knowledge/Skills.** 96.67 percent of GPS students met standards (31 percent higher than the state's target).
- **Appropriate Behavior to Meet Needs.** 94.74 percent of GPS students met standards (43 percent higher than the state's target).

Between the 2016-17 and 2018-19 school years, GPS consistently met the state target for all three areas.

Functioning Within Age Expectations

The following statistics compare 2018-19 state targets with the rates of GPS children who were functioning within expectations by six years of age or had attained those expectations by the time they exited the program, based on the state's SPP report:

- **Positive Social/Emotional Skills.** 70.97 percent of GPS students met standards (16 percent higher than the state's target).
- **Acquisition/Use of Knowledge/Skills.** 83.87 percent of GPS students met standards (50 percent higher than the state's target).
- **Appropriate Behavior to Meet Needs.** 70.97 percent of GPS students met standards (44 percent higher than the state's target).

Between the 2016-17 and 2018-19 school years, GPS consistently met the state target for all three areas.

Educational Environment Rates for School-Age Students with Disabilities

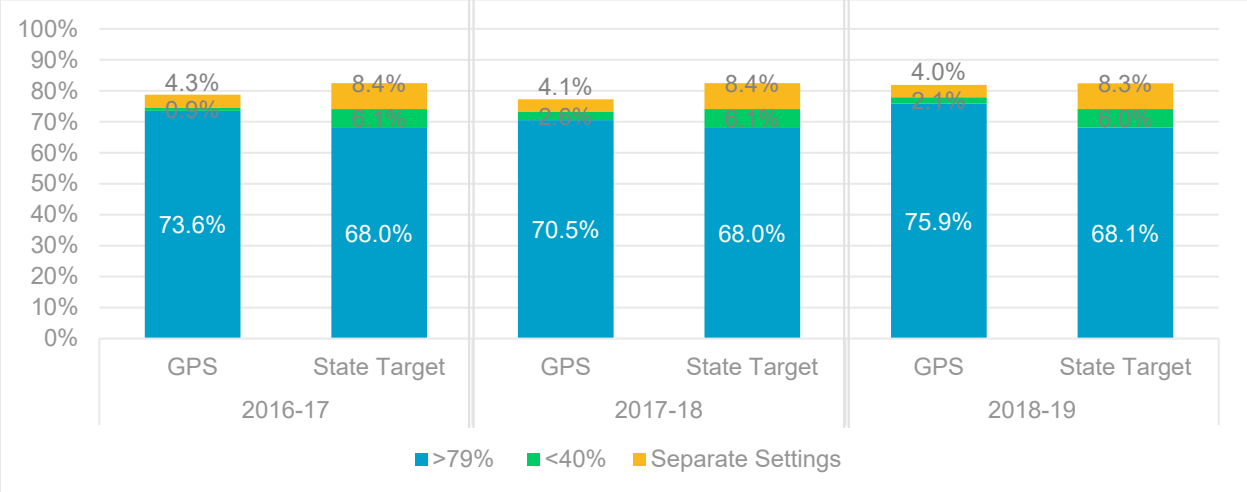
The data in this section reflect the educational settings of GPS school-aged students overall, as well as by disability areas and race/ethnicity.[47] In addition, district data are compared to state data and national data, and SPP targets for the three educational setting categories monitored by the US Department of Education's Office of Special Education Programs and the Connecticut Department of Education for students ages 6-21. The department also requires each state to monitor and set targets in their SPP for educational settings in which students with IEPs are educated.

Overall Educational Setting Data for GPS and State

Longitudinal data from the school years between 2016-17 and 2018-19 indicate that GPS students with disabilities were educated more frequently in an inclusive general education setting and less frequently in a separate setting. During those three years, GPS consistently met state targets for each of the three educational setting categories monitored:

- **General Education Setting more than 79.1 percent of the time**. Between the 2016-17 and 2018-19 school years, GPS's rate was an average of 7.9 percent higher than state targets.
- **General Education Setting less than 40 percent of the time.** GPS met the state target for students served in general education less than 40 percent of the time between the 2016-17 and 2018-19 school years. Between the 2016-17 and 2017-18 school years, the percentage of students participating in the general education setting less than 40 percent of the time increased by 1.7 percent.
- **Separate Setting**. Between the 2016-17 and 2018-19 school years, the percentage of GPS students educated in a separate setting decreased by 0.3 percent.

Exhibit 51. Percent of Students (Ages 6-21) by Education Setting for GPS & State SPP Targets, 2016-17 to 2018-19

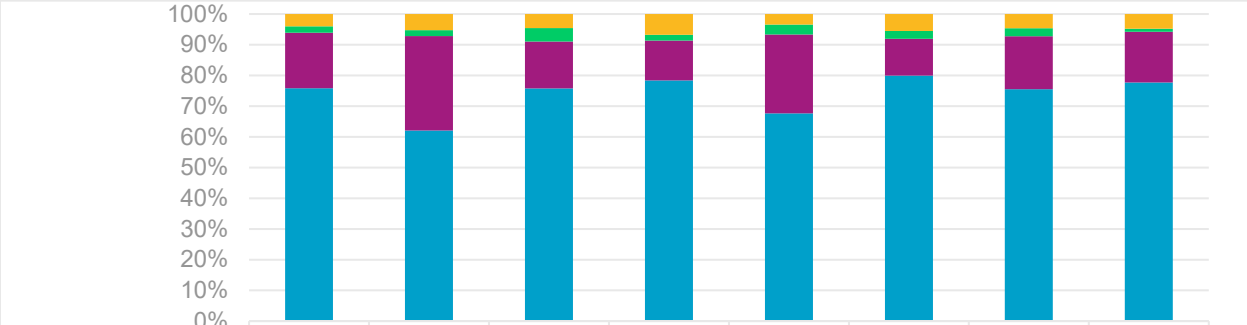


Of the comparable districts reviewed, five districts educated a larger percentage of students with IEPs in the general education setting more than 79 percent of the school day compared to GPS's rate of 75.9 percent. The following districts educated more students in the general education setting more than 79 percent of the school day: Ridgefield School District (79.9 percent, Fairfield Public Schools (78.4 percent), Westport School District (77.7 percent), Darien School District (75.8 percent), and Simsbury School District

[47] District and State data obtained from EdSight: http://edsight.ct.gov/SASPortal/main.do. Nation data obtained from OSEP Grads360: https://osep.grads360.org/#p=19

(75.5 percent). Three school districts educated a smaller percentage of students in the general education setting less than 40 percent of the school day compared to GPS's rate of 2.1 percent. Of the comparable school districts, GPS had the second-lowest percentage of students educated in a separate setting (4.0 percent).

Exhibit 52. Percent of Students by Educational Setting (Ages 6-21) for Comparable Districts, 2018-19

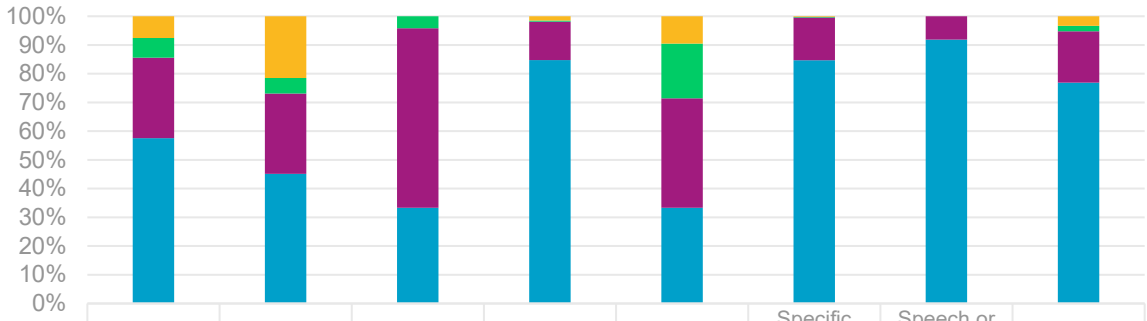


	Greenwich Public Schools	Avon School District	Darien School District	Fairfield Public Schools	New Canaan School District	Ridgefield School District	Simsbury School District	Westport School District
Separate Settings	4.0%	5.2%	4.6%	6.8%	3.5%	5.5%	4.6%	4.8%
<40%	2.1%	2.0%	4.4%	1.9%	3.2%	2.6%	2.6%	1.0%
40-79%	18.1%	30.7%	15.3%	13.0%	25.7%	12.0%	17.3%	16.5%
>79%	75.9%	62.1%	75.8%	78.4%	67.7%	79.9%	75.5%	77.7%

Educational Setting by Primary Disability Area

In 2019-20, 76.9 percent of students with IEPs spent great than 79 percent of the school day in the general education setting. Students with the following primary disabilities spent a larger percentage of their school day in the general education setting (79 percent or more) than the district average: speech or language impairments (91.9 percent), specific learning disability (84.7 percent), and other health impairment (84.8 percent). Students with the following primary disabilities were included in the general education setting more than 79 percent of the school day at a smaller rate: autism (57.6 percent), emotional disability (45.2 percent), and intellectual disability (33.3 percent). Students with an emotional disability were placed in a separate setting at a higher rate (21.5 percent) than the district average (3.5 percent).

Exhibit 53. Percentage of GPS Students (Age 6-21) by Disability Area and Educational Setting, 2019-20



	Autism	Emotional Disability	Intellectual Disability	Other Health Impairment	Other Disabilities	Specific Learning Disability	Speech or Language Impairments	District Overall
Separate	7.6%	21.5%	0.0%	1.5%	9.5%	0.2%	0.0%	3.3%
<40%	6.8%	5.4%	4.2%	0.4%	19.0%	0.2%	0.0%	1.9%
40-79%	28.0%	28.0%	62.5%	13.4%	38.1%	14.9%	8.1%	17.9%
>79%	57.6%	45.2%	33.3%	84.8%	33.3%	84.7%	91.9%	76.9%

Percentage of Students by Disability Category: District, State, and Nation Comparisons in Inclusive Settings

The following comparative analysis was completed on the two most inclusive educational settings: ≥80 percent and 40-79 percent by disability category for GPS, the state, and nation.[48]

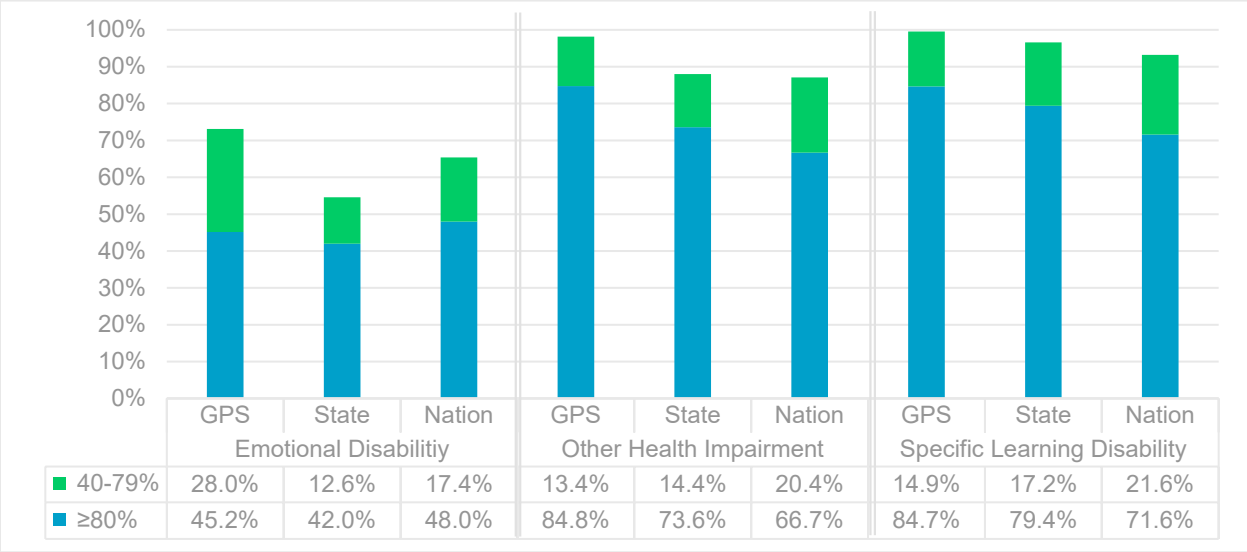
Emotional Disability. Compared to the state, GPS educated a slightly larger percentage of students with an emotional disability in the general education setting for more than 80 percent of the school day. Of the students identified with an emotional disability, 45.2 percent spent 80 percent or more of their school day in general education compared to 42.0 percent of students with an emotional disability. A larger percentage of GPS students with an emotional disability (28.0 percent) spent 40-79 percent of their day in general education compared to the state (12.6 percent) and nation (17.4 percent).

Other Health Impairments. GPS students with other health impairments were educated at a significantly higher rate (84.8 percent) in general education for more than 80 percent of their school day, compared to the state and nation, 73.6 percent and 66.7 percent, respectively.

Specific Learning Disability. Of students with a specific learning disability, 84.7 percent spent 80 percent or more of their school day in the general education setting compared to 79.4 percent and 71.6 percent of students in the state and nation, respectively.

[48] District data provided by GPS in 2021; State and Nation data available through Grads360 for FFY2017: https://osep.grads360.org/#p=19

Exhibit 54. Percentage of GPS Students (Age 6-21) with ED, SLD and OHI by Educational Setting Compared to State and Nation, 2019-20

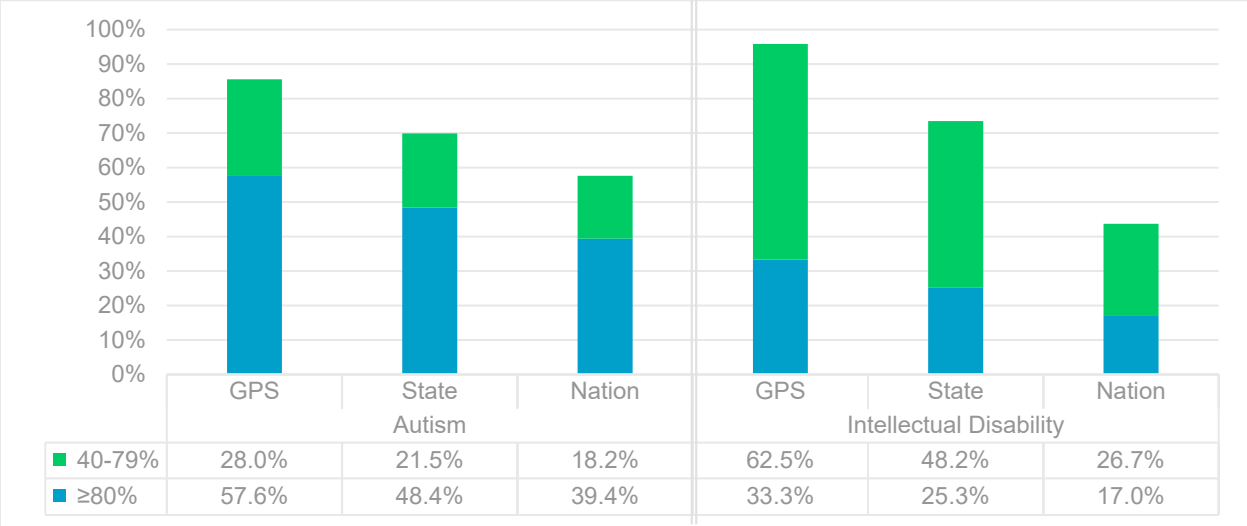


	GPS	State	Nation	GPS	State	Nation	GPS	State	Nation
	Emotional Disabilitiy			Other Health Impairment			Specific Learning Disability		
40-79%	28.0%	12.6%	17.4%	13.4%	14.4%	20.4%	14.9%	17.2%	21.6%
≥80%	45.2%	42.0%	48.0%	84.8%	73.6%	66.7%	84.7%	79.4%	71.6%

Autism. Compared to the state and nation, GPS had a higher percentage of students with autism educated in the general education classroom for 80 percent or more of their school day. Additionally, GPS had a higher percentage of students educated in the 40-79 percent setting (28.0 percent) compared to the state (21.5 percent) and nation (18.2 percent).

Intellectual Disability. Of the students with an intellectual disability in GPS, 33.3 percent were educated in general education for 80 percent or more of the school day. This percentage is higher than the state (25.3 percent) and nation (17.0 percent). GPS also had a higher percentage of students with an intellectual disability educated in the 40-79 percent setting (62.5 percent) compared to the state (48.2 percent) and nation (26.7 percent).

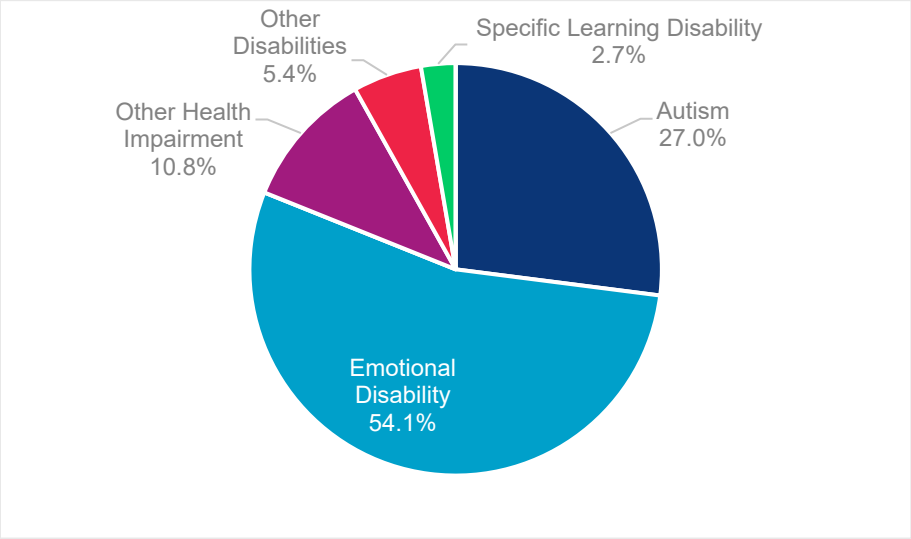
Exhibit 55. Percentage of GPS Students (Age 6-21) with AUT and ID by Educational Setting Compared to State and Nation, 2019-20



	GPS	State	Nation	GPS	State	Nation
	Autism			Intellectual Disability		
40-79%	28.0%	21.5%	18.2%	62.5%	48.2%	26.7%
≥80%	57.6%	48.4%	39.4%	33.3%	25.3%	17.0%

Separate Settings. In 2019-20, 3.3 percent of students with an IEP were placed in a separate setting. Of the students in a separate setting, 54.1 percent had an emotional disability, 27.0 percent had autism, 10.8 percent had an other health impairment.

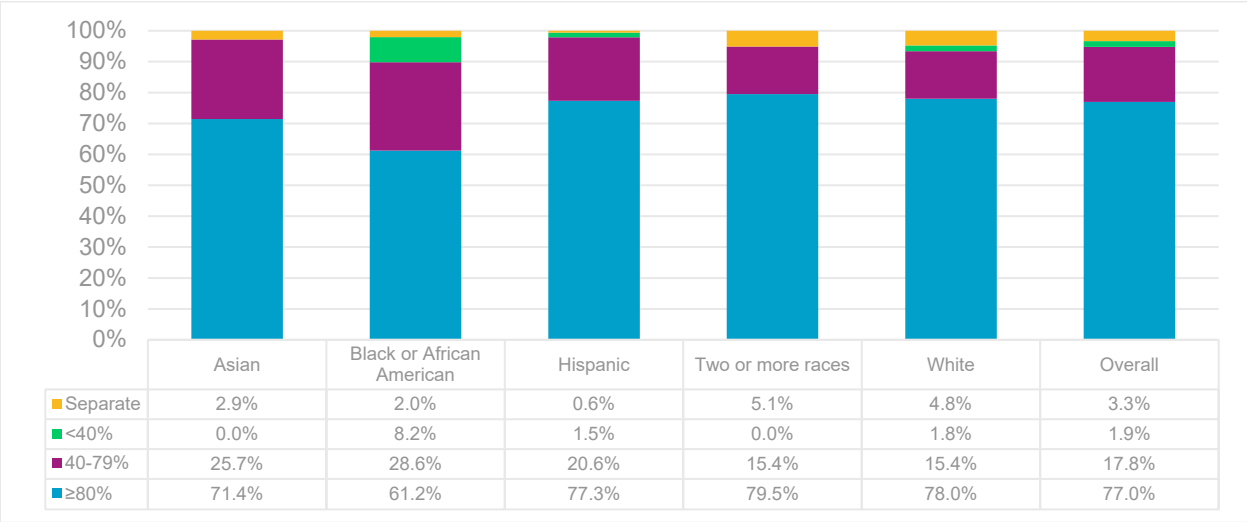
Exhibit 56. Percentage of GPS Students (Age 6-21) in a Separate Setting by Primary Disability Eligibility, 2019-20



Educational Setting by Race/Ethnicity

In 2019-20, GPS students with IEPs who identified as white, two or more races, and Hispanic were included in the general education setting 80 percent or more of their school day at a higher rate than the overall district average of 77.0 percent.[49] Black or African American students with disabilities had the lowest rate of inclusion in the general education setting (80 percent or more of the school day) at 61.2 percent.

Exhibit 57. Percentage of GPS Students with Disabilities (Age 6-21) by Race and Educational Setting, 2019-20



	Asian	Black or African American	Hispanic	Two or more races	White	Overall
Separate	2.9%	2.0%	0.6%	5.1%	4.8%	3.3%
<40%	0.0%	8.2%	1.5%	0.0%	1.8%	1.9%
40-79%	25.7%	28.6%	20.6%	15.4%	15.4%	17.8%
≥80%	71.4%	61.2%	77.3%	79.5%	78.0%	77.0%

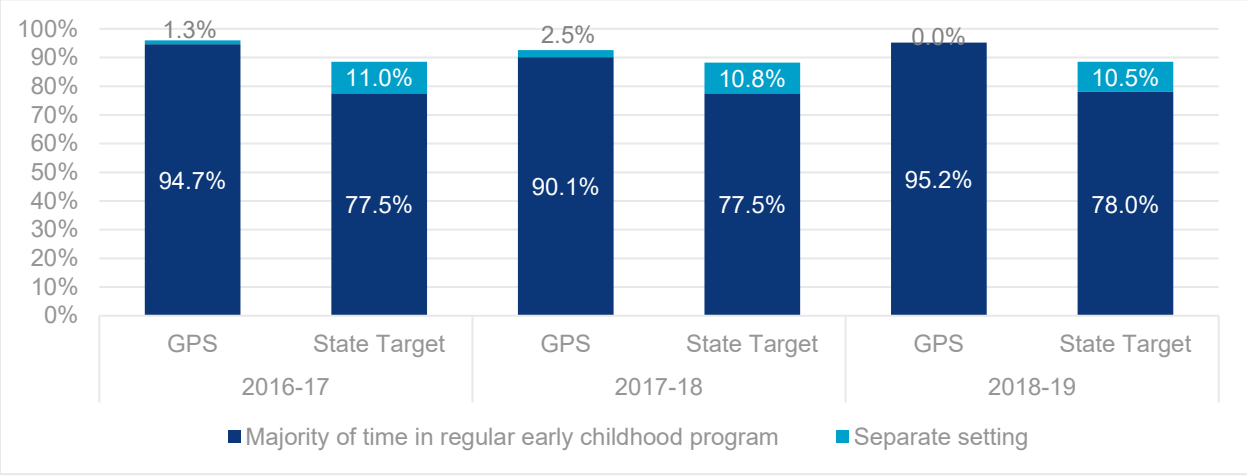
[49] Division data provided by GPS in 2021. Data excludes the following race/ethnicities due to n<10: American Indian or Alaskan Native and Native Hawaiian or Pacific Islander

Early Childhood Educational Setting

Between the 2016-17 and 2018-19 school years, GPS consistently met the state target for educating students in regular early education program the majority of the time, as well as the state target for educating students in separate settings.

- **Majority of time in regular early childhood program**. Between the 2016-17 and 2018-19 school years, the percentage of GPS students served in this setting exceeded the state target by an average of 15 percent.
- **Separate setting.** Between the 2016-17 and 2018-19 school years, GPS substantially exceeded the state target for students educated in a separate setting. During the 2018-19 school year, GPS served 0 percent of students in this setting.

Exhibit 58. Percent of Students (Ages 3-5) by Educational Setting for GPS & State SPP Targets, 2016-17 to 2018-19



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 the curriculum be designed to enable all students to successfully access and engage in learning without changing or reducing instructional targets. In order to meet the diverse needs of all learners in the classroom, educators must prioritize Universal Design for Learning (UDL) strategies as part of core instruction in the general education classroom, as well as Differentiated Instruction, Accommodations and Modifications, and Specially Designed Instruction (SDI) to support access and success of learners. Implementing such a varied mix of appropriate supports while maintaining the integrity of the curriculum can be challenging but is necessary to support diverse learners.

Students with IEPs often need more time to master concepts through specialized, research-based approaches according to instructional need, measured performance, and recognized disability. SDI, by definition, meets this need by 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 districts across the nation have developed policies and procedures that clarify the intent of SDI and provide guidance in developing a common understanding of the best practices that will support 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 the need to better define and improve the delivery of SDI with a growth mindset to support continuous improvement regarding the provision of SDI and special education more broadly.

In PCG's classroom visits, the following elements were identified as meeting the criteria for SDI in at least one classroom visit:

- Explicit Direct Instruction (pre/post instruction)
- Graphic or Visual Organizers
- Individualized Support

Universal Design for Learning

Universal Design for Learning (UDL) is a framework to improve and optimize the needs of varied learners and represents an evidence-based practice in general education. Therefore, UDL strategies are not considered to be unique to special education or specially designed instructional practice. However, there is no doubt that implementation of UDL principles enables students with IEPs to more easily progress in the general education setting. In addition, the deliberate use of differentiating what is taught, how it is taught, and how learning is assessed according to students' readiness, learning profile, and interests, creates a more personalized or tailored approach to learning and yields progress.[50] UDL and differentiated instruction (DI) are considered critical practices to apply in the inclusive classroom setting.

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.[51] UDL highlights a common, foundational set of practices that align with a districts' beliefs and vision and mission statements about the role of the teacher, how students learn best, and the purpose of education. In addition, UDL provides all educators a common set of understandings and language and practices for designing and implementing instruction that engages students 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 varied ways to engage students, present new content, 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.[52] UDL can make instruction more accessible to all students when used in designing a school 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.

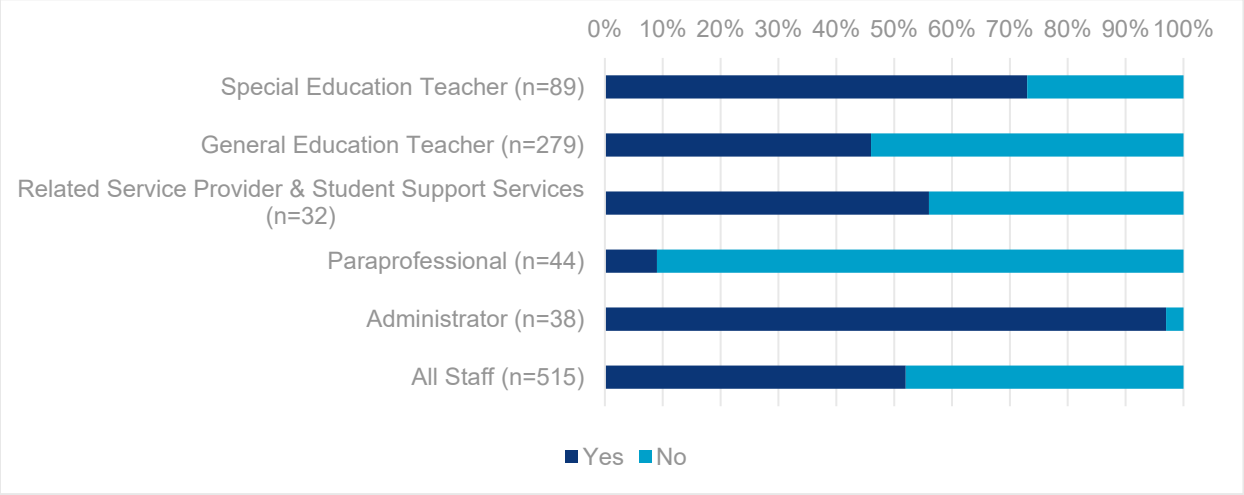
[50] Tomlinson, C.A. (2017). How to Differentiate Instruction in Academically Diverse Classrooms, 3rd Edition
[51] National Center on UDL. UDL Guidelines- Version 2: Research Evidence. http://www.udlcenter.org/research/researchevidence
[52] LD OnLine. http://www.ldonline.org/article/13002/

The following comments on UDL as it relates to supporting all students, including students with disabilities, were gathered from building leaders and District administrators in interviews and focus groups:

- "Years ago understanding by design was a focus, right now I don't think we have a focus. There's been such a turnover that we don't have that instructional model, that we feel is a school system. I don't feel like we have that. It's building by building."
- "I think we need to reestablish an inclusive mindset here. We are very much a District into sorting. We sort our sped, EL…. We were moving towards more UDL, then we got a shift in administration and then that fell by the wayside."
- "I think people are still unfamiliar with UDL principles."
- "Every AP was sent to the Harvard program (CAST) program. When you talk about UDL principles, people are familiar, but they lost an opportunity to move forward with it."
- "The backwards models, even the goals that are created--what is the end result we're looking for? That been pretty well the case for years."

In the GPS staff survey, staff were asked if they were familiar with and/or had received training in UDL. More than 70 percent of special education teachers indicated they had received training in UDL; yet only 45 percent of general education teachers indicated the same.

Exhibit 59. Staff Survey: Are you familiar with and/or have you received training in Universal Design for Learning?



During classroom visits, PCG made the following observations regarding UDL:

- Although a sizeable group of assistant principals and special educators received UDL training, there was very little evidence of its usage, e.g., 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 consideration was given to support a student's general education curriculum learning and effective participation in class and interaction with their peers without IEPs.
- There were no reporting of the term "UDL" or corresponding principles during the pre/post discussions with teachers. This alone, however, does not mean that these practices are never used.

The aggregated results of PCG's classroom visits reflected a variety of research-based general instructional practices and approaches, and which occurred frequently across general education classrooms. Some of these included:

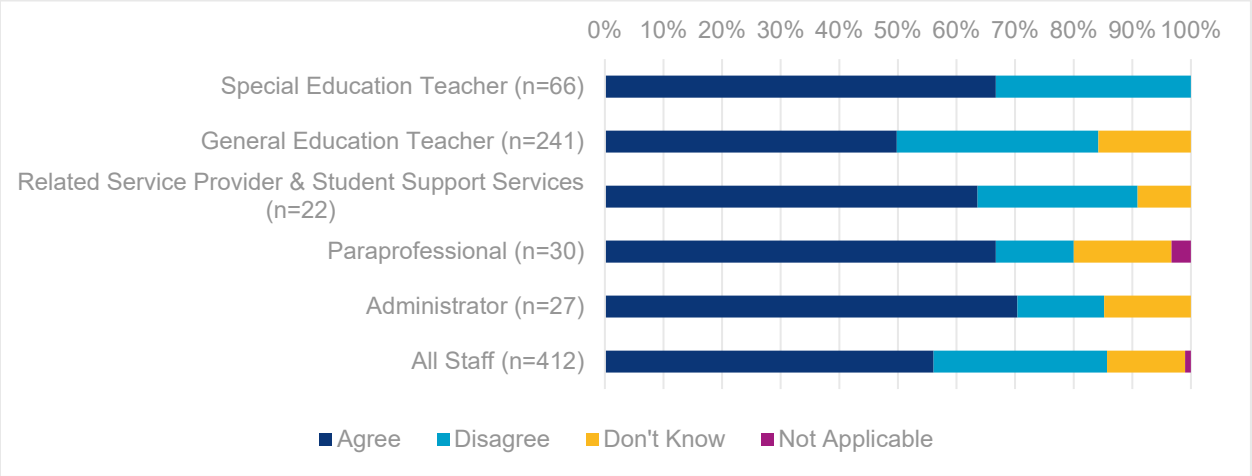
- Clearly stating lesson goals
- Providing student feedback
- Questioning students to check for understanding
- Encouraging students to work together collaboratively
- Teaching students strategies in addition to content

Accommodations and Modifications in the Classroom

In a previous section of this report, PCG discussed accommodations as described within the IEP. This section describes them as seen within our classroom visits and survey responses. An accommodation is "an alteration of environment, curriculum format, or equipment that allows an individual with a disability to gain access to content and/or complete assigned tasks."[53] Accommodations are typically grouped into four categories: presentation, response, setting, and timing and scheduling. In contrast, a modification describes a change in the curriculum or expectation of mastery. A modification changes what a student is taught or expected to learn.

In the GPS staff survey, staff were asked to agree or disagree with the following statement: "The special education/related services, accommodations, and/or modifications identified in students' IEPs are provided as written." More than 65 percent of special education teachers agreed with the statement, compared to 50 percent of general education teachers agreed.

Exhibit 60. Staff Survey: The special education/related services, accommodations, and/or modifications identified in students' IEPs are provided as written.



The following qualitative statements were shared in the staff survey:

- "Teachers have developed accommodations and goals that benefit the students. Teachers collaborate daily or when needed to accommodate student needs."

[53] Referenced from: https://www.washington.edu/doit/what-difference-between-accommodation-and-modification-student-disability#:~:text=The%20term%20%22accommodation%22%20may%20be,a%20regular%20course%20of%20study.

- "We need clear sharing of IEP documents and clear expectation that regular education teachers review and know the accommodations in a student's IEP."
- "Areas of need for GPS include more differentiation and use of accommodations."
- "Our District has very highly qualified teachers. When given appropriate time to service their students, teachers (regular and special education) and related service providers create and implement appropriate services/accommodations/modifications."

During PCG's classroom visits, it was difficult to discern if students were provided accommodations, or if there were individualized modifications to curriculum content, instruction, and/or assessment. For the majority of classroom visits, these accessibility features could not be documented. With that said, accommodations and modifications may have been present but not obvious to the observer.

Co-Teaching and Collaborative Consultation Teaching

Co-Taught Instruction

The use of a co-teaching model that involves a general education teacher and special education teacher providing inclusive education opportunities for students with disabilities continues to gain popularity across the U.S. Co-taught classrooms offer one way in which the expectations of inclusive education can be met for students with and without disabilities.[54] Several models of co-teaching that are most often implemented within classrooms are reflected within the professional literature.[55] These 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.[56]

Relevant literature widely accepts there is a need to move toward more collaborative approaches to co-teaching and a perception that these models are important in reaching a diverse student population.[57] 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.[58] 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.[59]

Co-teaching practices seem to be influenced by multiple factors across schools, teachers, 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

[54] 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.
[55] Id.
[56] Id.
[57] 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
[58] 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.
[59] 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.

of the school day during instruction for a single content area. Teachers may also work in numerous co-teaching teams throughout the day to instruct different groups of students or across different content areas.[60]

PCG's classroom visits included two clearly co-taught classrooms at the middle school level. Each of these classrooms appeared to reflect known standard practices in co-teaching. PCG observed no co-taught classrooms in the elementary schools or high school and was informed by administration that no such classes exist at those levels in GPS.

During interviews with administrative staff and some teaching staff (excluding those from the middle schools), there was apprehension around the possibility that co-teaching could be implemented in GPS. Various explanations for the apprehension included cost, training, and efficacy. It was noted that many of those opposed to co-teaching have also been long-time staff in the District, specifically long-time administrators.

Collaborative Consultative Instruction

Within the Collaborative Consultation model, the special education teacher serves in a variety of roles as a strategy expert in partnership with the general education teacher. In other words, it is a special education service option in which special and general educators demonstrate ongoing collaboration and decision-making regarding the instructional needs of students with disabilities through pooled resources and joint accountability. Most often, the general education teachers are responsible for content expertise, and the special education teachers adapt the content for individual learning styles and abilities based on the students' IEPs.

Under this model, the student is always placed in the general education classroom, and resource room replacement is no longer used. However, special education and general education teachers have the flexibility to meet the individualized and evolving needs of students with disabilities. Special educators are provided a caseload of students with disabilities across a number of classrooms and/or teachers, for whom they are responsible for providing the specialized supports needed by each student. Unlike the more static model of a full-time resource room replacement or self-contained classroom, the special educator, in collaboration with their general education partner, determines the daily/weekly level of support of the student in response to the changing demands of the curriculum and instruction[61]. The special educator uses all the vehicles of special education services available in a flexible schedule. This schedule may include small group or individual direct instruction within or outside the general education classroom; monitoring of students within the general education classroom; traditional models of co-teaching (including in-class support); modifications to and adaptation of general education curriculum and instruction; teacher consultation; and technical assistance.

PCG observed collaborative consultative instruction in Academic Lab classes within the middle and high schools. However, the roles and responsibilities of Academic Lab teachers were confusing and unclear. These teachers appeared to have roles that were difficult to fulfill for all students over whom they had responsibility. In particular, there was a significant disconnect noted between the Academic Lab teachers' knowledge and subsequent support of the instruction occurring in the classes of the students on their respective caseloads. In most cases, based on PCG's visits, Academic Lab instructors acted as tutors, relied on students to articulate what they were doing in their classes, and students requested support as needed. PCG saw Academic Lab teachers using the student information management system to confirm attendance, course grades, and assessment grades. However, this was divorced from the content within

[60] 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.
[61] Eisenman, L.T., Pleet, A.M., Wandry, D., McGinley, V., (2011). Voices of special education teachers in an inclusive high school: Redefining responsibilities. Remedial and Special Education 32(2) 91-104. Sage Publishing.

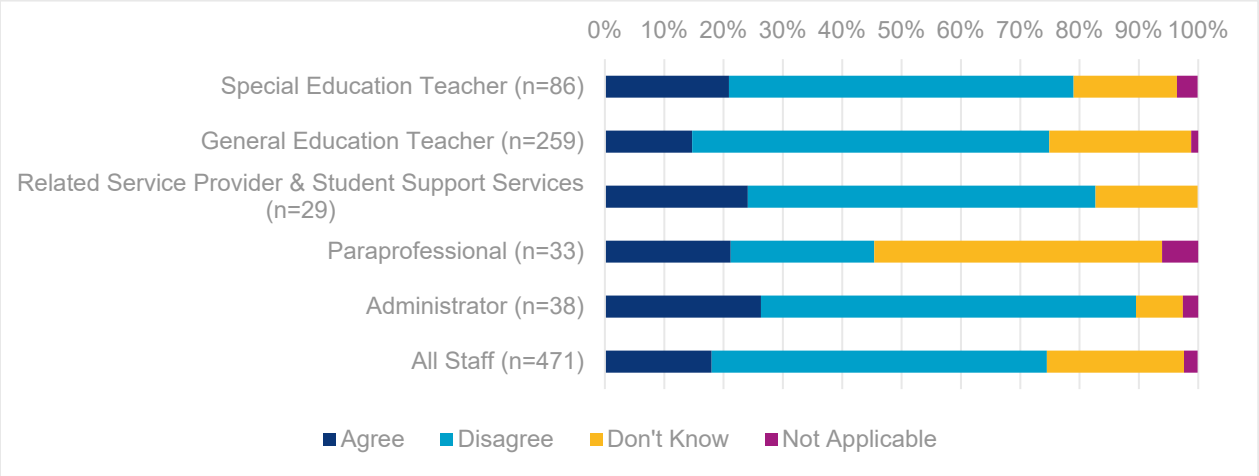
these respective classes. Academic Lab teachers indicated they do sometimes consult with general education teachers; however, in most cases, it was not frequent or formalized.

The following comments were made in the qualitative response section of the staff survey:

- “Classes like "reading intervention" and "decoding" have tiny enrollments and seem to make no progress for students, while using an inordinate amount of resources. "Academic labs" are study halls with certified teachers babysitting students and helping them with homework. It is neither a lab nor academic in any meaningful way.”
- “Academic Lab and Resource Rooms have too many students with too many different needs to address goals and objectives, on top of behaviors and grades. There needs to be a cap of no more than 2-3 students in these classes.”
- “Most students are well-served in the current model of academic labs.”

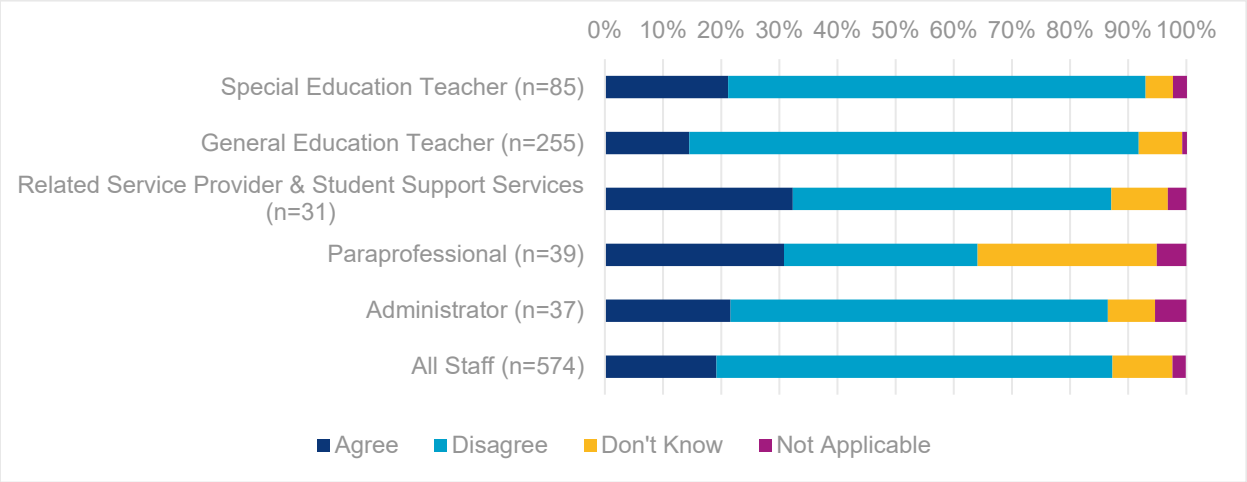
In the GPS staff survey, staff were asked to agree or disagree with the following statement: “GPS has established standards for delivering co-teaching/collaborative instruction.” More than 20 percent of special education teachers and 15 percent of general education teachers agreed with that statement. This is likely the case due to co-teaching only existing at the middle schools.

Exhibit 61. Staff Survey: GPS has established standards for delivering co-teaching/collaborative instruction.



In the GPS staff survey, staff were asked to agree or disagree with the following statement: “General and special education teachers have collaborative planning time to prepare effective instruction for students with IEPs.” More than 20 percent of special education teachers and more than 15 percent of general education teachers agreed.

Exhibit 62. Staff Survey: General and special education teachers have collaborative planning time to prepare effective instruction for students with IEPs.



Differentiated Instruction and Inclusive Practices

Inclusive instruction first became a popular concept in the 1980s and was used to distinguish special education placement in the general education classroom with appropriate supports from the prior concept of "mainstreaming."[62] The practice of mainstreaming involved students with disabilities in general education classrooms without the supports they needed to be successful.[63] It is important to note that the mainstreaming term was used shortly after the special education law was first implemented (1978) and special education was viewed as the "place" where students learned. Through the reauthorizations of IDEA and as special education expertise grew, special education is no longer considered to be a place of instruction but rather a constellation of instructional modalities, including those that are specialized. The concept of inclusive instruction has grown to the idea of supporting the learning of students with IEPs along with their typical peers through UDL, differentiated instruction, collaborative teaching, and co-teaching.

Differentiated Instruction (DI) means tailoring instruction to meet individual needs. Whether teachers differentiate content, process, products, or the learning environment, the use of ongoing assessment and flexible grouping makes this a successful instructional tool. The deliberate use of differentiating what is taught, how it is taught, and how learning is assessed according to students' readiness, learning profile, and interests, creates a more personalized or tailored approach to learning and yields progress.[64]

According to information gathered from interviews and focus groups, the special education department leadership has had a thorough orientation toward "full inclusion." However, several people indicated that the GPS special education administration's version of inclusion was more accurately aligned to the way inclusion was viewed in the 1980s – overemphasizing the location of students with disabilities in general education classrooms yet under-recognizing (or failing to recognize) the need for UDL, DI, co-teaching, or other staffing models that support meaningful inclusion for all students.

During interviews and focus groups with staff and administration, the following was shared:

[62] See: https://www.njcie.org/inclusion
[63] id.
[64] Tomlinson, C.A. (2017). How to Differentiate Instruction in Academically Diverse Classrooms, 3rd Edition

- "The high school is larger, and they run and do things their way. The superintendent has asked the high-school to review their schedule – the perception is that it is a schedule that is built for a high-performing learner."
- "I would like to see some unique programming, but we also have some children that need unique instruction that we don't try. I'm thinking about the discrete trials, in a really small setting, 5 kids and four adults, working with them all day, as opposed to them pushing into a classroom…. Oftentimes the teacher doesn't have the skill set. And the paras sit with them, and we haven't had training for the paras."
- "At the high school we just have lower-level classes, and they all put them [students with disabilities] in the lower class. [One of our teachers…] was teaching a physics class, and it's not a sped class, but 18 or 19 out of the 20-something had an IEP or a 504. It's not reflected as a unique class or programming."
- "We really don't have unique programming for students with disabilities."
- "We don't have unique programming. If you have a child with autism… there's really no unique instruction that happens for that child. That's what makes it difficult. In my previous district, there was intensive training. And because we don't have programming like that you really are all things to all children."
- "If someone has a child on the autism spectrum, and (the teachers) haven't been trained on what they need in terms of instruction, and they're not as educationally savvy, pushing into class, the parents feel the staff don't have the skill set."
- "We sort of do ability grouping or skill grouping in the middle schools too, but it it's sort of magnified at the high school."
- "GPS does not have unique programming – makes service delivery feel difficult for special education teachers – makes them feel like they are all things to all learners."
- "I think in terms of inclusive education, most kids here go to their home schools. We don't gather kids by a disability level and gather them in a room together. It's also a place for significant growth. There's a district-wide commitment to inclusion in special education. Our cabinet and board need to be consistent in the messaging that all kids belong together, whether they're disabled or not. I think our biggest challenge in doing that—is grasping, people's hearts and minds, and time."
- "What people mistake is that in an inclusive environment, that they're in a general education class all day, that's not the case. We have students that spend their time in substantially separate settings. We have resource, pull out speech and counseling."
- "We DO NOT group kids by disability levels. We try to really emphasize that we emphasize services based on who the kid is, not what their disability is. But there are some parents, specifically those with autism that like to put that label front and center with their children…"
- "We did some cursory training [on co-teaching], it was not in-depth training. So we did not do it across the District, so no, systemic training, that's another problem with Greenwich."
- "The model is that students are a member of the general education classroom that is there home base and then they move into other areas – there are some students that are served in a substantially separate setting. Every child is not spending all day long in the special education setting. They jump to pulling students out because it is easier. They do not group students by disability label. They try to emphasize that they provide services to students based on the student need and not what the label tells them. There is a push from parents of students with autism that they would like more specialized programming."

- "Obviously there is a value to having two people in a room that have different expertise that come from different backgrounds to aid in small groups."

During PCG's classroom visits, the following observations were noted:

- Several classes at the high school are labeled as "inclusive" but are actually made up primarily of students with IEPs, including but not limited to classes within the following courses visited by PCG: English 9 112; English 10 211; English 11, all 300 level courses; Algebra 1/ Geometry Course 1, 2, or; Geometry A1, Algebra 2A; Geometry B; Grade 9 Practical Biology; Grade 10 Practical Chemistry; Grade 11 Practical Physics; Grade 9 Global Studies 112; and Grade 10 American History 211. In none of these classes was there a co-teacher supporting students with disabilities, yet more than half of all the students had IEPs or 504 plans.
- There were very little evidence that substantially indicated the appropriate use of differentiation.
- While there was evidence of support being provided to students, clear and deliberate examples of DI were nearly absent across all inclusive classrooms. (In some classrooms, there were examples of personalized instruction, which is not the same as DI.)

Accelerated Classes and Programming

It is recognized that students with IEPs have a disability that adversely impacts their ability to benefit fully from general education without supports. As such, students with IEPs require services 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. Students may also need support to manage their behavior. 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 Connecticut State 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;
- 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 to materials (e.g., assistive technology) or procedures that do not change the standards but allow students to learn content within the Connecticut State Standards.

It must also be made clear that these supports and accommodations may be provided in any course offered in a school district and do not exclude accelerated courses. According to a Dear Colleague Letter by the U.S. Department of Education, as part of a child's free and appropriate education (FAPE) 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."[65]

GPS offers an Advanced Learning Program (ALP) from grades 2 through 7. The District utilizes a "placement process" to determine if a student is eligible for ALP. According to the GPS website:

> *The purpose of the Placement Process is not to determine if a student is "gifted" or "not gifted."*

[65] 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.

Rather, the purpose of the placement process is to identify specific academic student needs and match learners with appropriate supplementary services.

This three-step process includes Referral, Evaluation, and Placement.

The Referral Phase begins with screening. Screening is the process of reviewing current grade level data about each child to determine if a student should be referred for further assessment for possible placement in the Advanced Learning Program. The screening process includes: a review of current performance data, grade level standardized tests, and observational data using checklists based on gifted characteristics.

Referrals (sometimes called Nominations) is the direct procedure that enters a student into the Evaluation Phase. Referrals may be initiated by teachers, parents, or others who may have knowledge of students' learning needs.

In the Evaluation Phase GPS uses a multifaceted placement scheme to identify not only students who are already high achieving in the domain but also those with potential but underdeveloped achievement.

Multifaceted placement scheme includes:

- *Age Normed measures of aptitude for reasoning in each of the domains for which services will be provided (for example, verbal reasoning scores considered for placement into language arts services and quantitative reasoning scores for placement into mathematics). (Cognitive Ability Tests)*
- *Grade Normed measures of achievement in each domain for which advanced services will be provided. (Achievement Assessments)*
- *Criterion Normed measures that add descriptive information about students' performance or potential in the domains for which services are provided. (Performance Tasks)*

In the Placement Phase the Building Advisory Committee (BAC), consisting of the ALP teacher(s), classroom teachers, a building administrator, and the ALP facilitator, conducts a comprehensive review of each child's record and performance during the evaluation in order to make final placement decisions. All selection decisions reflect the best professional judgment of the committee to determine the best way to meet each child's individual needs.

During interviews with District administration, it was noted that students with disabilities are provided testing accommodations during the ALP assessment. According to focus groups with parents though, students with disabilities struggle to gain access. Students in high school do not need to engage in a formal testing process to enter Honors or Advanced Placement courses; however, there may be prerequisite courses required for entry.

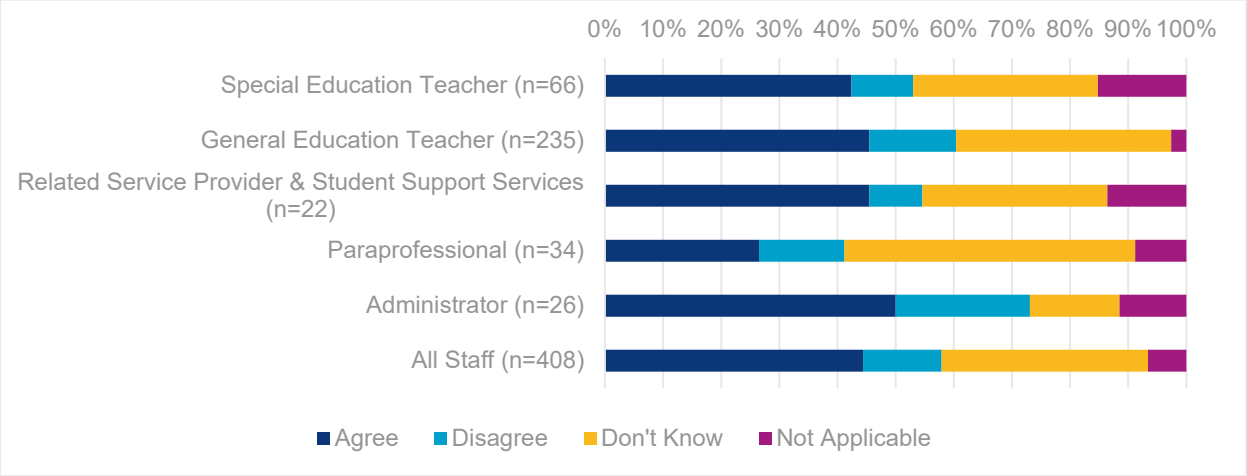
In GPS, there is frequent use of the term "Twice Exceptional Student" by parents and staff in describing students with disabilities who are or are believed to be gifted. There are various beliefs within the district by administrators, staff, and parents about what defines "Twice Exceptional" and that the district does not adhere to a specific definition of giftedness. PCG did not assess the District's application of state procedures and guidance for the identified of gifted and talented students. PCG did address whether students in ALP or other accelerated classes received specialized instruction and/or support.

PCG visited accelerated and ALP classrooms. PCG saw a classroom where the teacher supported the unique learning needs of a student with disabilities in a manner that was beneficial to all students – the teacher was effectively differentiating instruction. PCG also saw an accelerated class where the teacher struggled to manage student behaviors of the classified students. In this case, the teacher was the only adult in the room and appeared to have limited behavioral management techniques to support the children who struggled to stay seated and follow directions.

In the GPS staff survey, staff were asked if students with disabilities who show an academic aptitude for advanced classes are being recommended for/given access to advanced courses. Some 42 percent of special education teachers and 46 percent of general education teachers agreed with that statement.

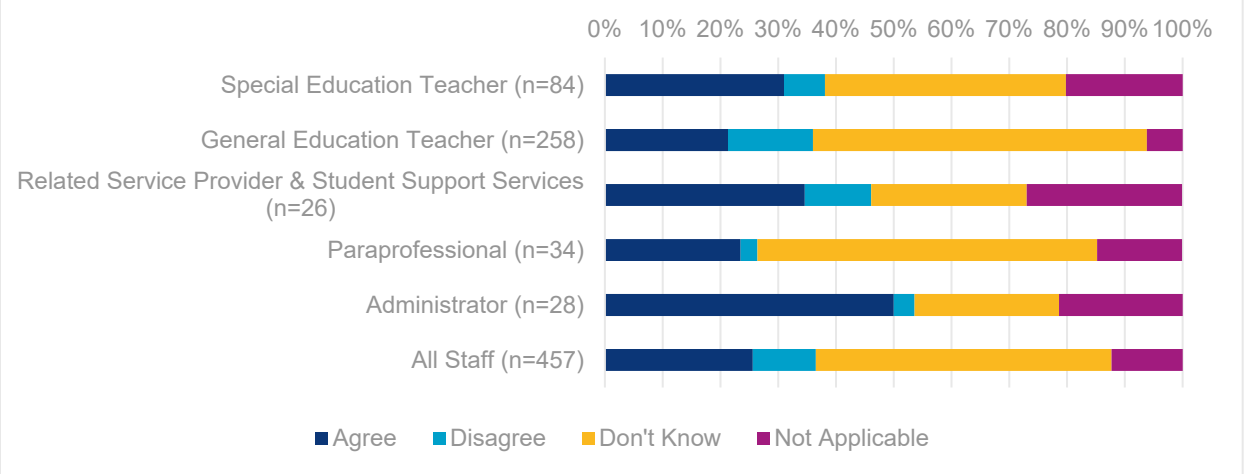
During parent focus groups, some parents shared a belief that there are GPS students who are twice exceptional but are not being allowed into the ALP, honors, or advanced classes.

Exhibit 63. Staff Survey: Students with disabilities who show an academic aptitude for advanced classes are being recommended for/given access to advanced courses.



In the GPS staff survey, staff were asked whether they agreed or disagreed with the following statement: “Services for students with disabilities also enrolled in ALP are meeting their needs.” Some 31 percent of special education teachers 21 percent of general education teachers agreed with the statement.

Exhibit 64. Staff Survey: Services for students with disabilities also enrolled in ALP are meeting their needs.



Assistive Technology

In IDEA 2004, assistive technology (AT) 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 for 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."[66]

Based on information gathered from interviews, focus groups, and classroom visits, the use of assistive technology seems to be isolated to applications for students with low incidence disabilities. An administrator shared that previously, GPS previously had a dedicated AT consultant whose primary role was to evaluate students with AT needs; however, device servicing and, at times training, was left to the IT Department.

During classroom visits, PCG staff observed the use of dedicated speech-generating devices for non-verbal students. PCG staff also observed the use of switch devices for non-verbal students. In both cases, according to the teachers, the devices were supported by a speech language pathologist.

English Learners and Recently Arrived Immigrant English Learners

English Learners (ELs) and Recently Arrived Immigrant English Learners (RAIELs) are a highly diverse group, encompassing important subgroups such as students born in the U.S. whose home language is one other than English or whose family has 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 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 needs 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 the needs of ELs and RAIELs. GPS has RAIEL students; however, the precise percentage is unknown.

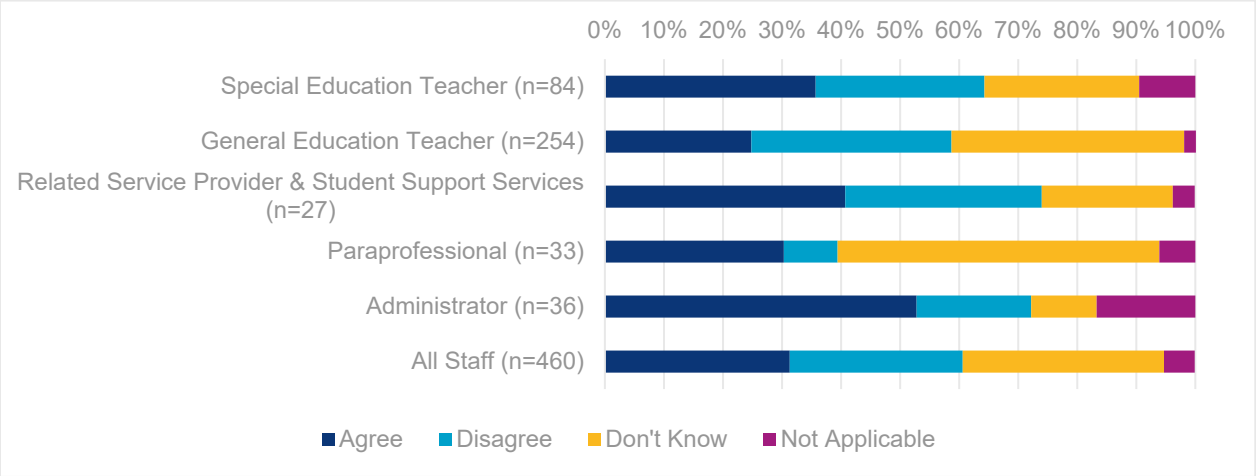
According to GPS administration, there is a concern that EL students are being overidentified as having a disability when the student's difficulties may actually be a manifestation of their needs as an English Learner. GPS administrators are aware of the schools that have the highest numbers of EL students.

During classroom visits, PCG observed classes that included EL students; however, PCG did not observe specific EL services for those students.

In the GPS staff survey, staff were asked if services for dually identified (English learner students with disabilities) students at their school are meeting student needs. Some 35 percent of special education teachers and 25 percent of general education teachers indicated this was the case.

[66] 20 U.S.C. 1401(2)

Exhibit 65. Staff Survey: Services for dually identified (English Learner students with disabilities) students at my school(s) are meeting student needs.



Specialized Behavior Support for Students with Disabilities

With the passage of the IDEA 2004 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 Office of Special Education Technical Assistance Center on Positive Behavioral Interventions and Supports under the U.S. Department of Education, 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[67]:

- Provide incentives for whole-school approaches;
- Implement scientifically based early reading programs; and
- Use early intervention services to stop labeling students as 'disabled' in order to address their learning and behavioral needs.[68]

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, students with disabilities are served best when their general and specialized supports are integrated 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 IEP. Adopting these expectations and applying them during specialized instruction is important, too. School personnel teach students behavioral expectations by using the core PBIS lessons and utilizing the school-wide acknowledgment system for appropriate behaviors. Within classrooms, students with and without disabilities benefit from frequent opportunities to respond, positive acknowledgments, and reminders such as prompts and pre-corrections.

Tier 2: Targeted interventions at this tier are more intensive than those given at the universal tier 1 level. Students may receive Tier 2 targeted interventions in addition to Tier 1 supports. Students with disabilities

[67] OSEP Technical Assistance Center on Positive Behavioral Interventions and Supports (2021). Positive Behavioral Interventions & Supports. See: https://www.pbis.org/topics/disability.
[68] id.

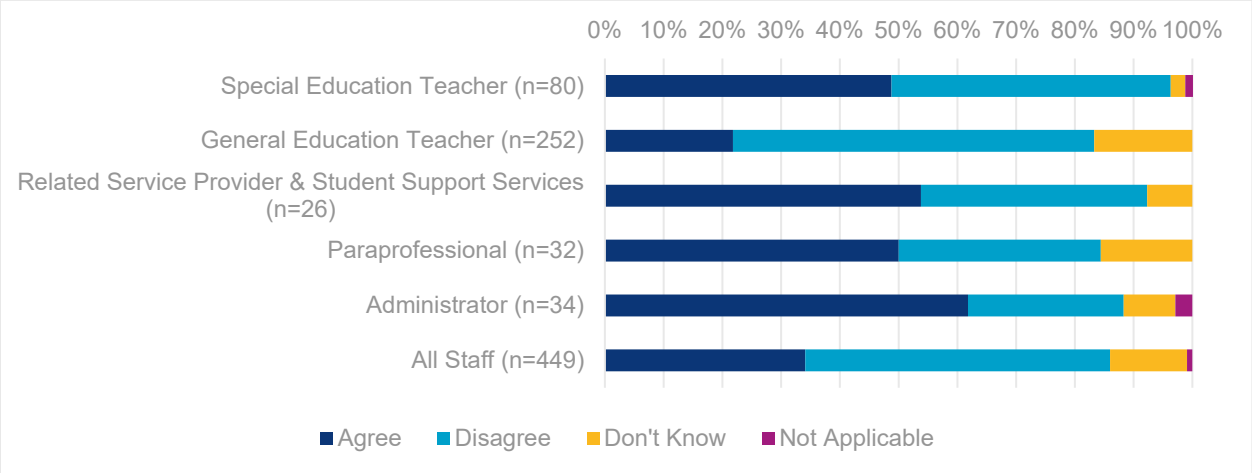
may benefit from Tier 2 supports the same as any other student in the school. However, Tier 2 supports should supplement and not reduce or replace services outlined in the student's IEP.

Tier 3: For those few students who engage in chronic, severe behaviors and who have not responded to Tier 1 and Tier 2 supports, Tier 3 interventions may be appropriate. The Tier 3 framework includes the design of Behavior Intervention Plans (BIP) with interventions driven by Functional Behavioral Assessments (FBA). 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.[69]

According to data gathered from interviews and focus groups with administrators, as well as information gathered during file review focus groups, GPS would benefit from increased focus on providing appropriate support to students with behavioral disabilities.

In the GPS staff survey, staff were asked to agree or disagree with the following statement: "There is a well-articulated approach in my school(s) to address the behavior needs of students with disabilities." Less than 50 percent of special education teachers and more than 20 percent of general education teachers agreed.

Exhibit 66. Staff Survey: There is a well-articulated approach in my school(s) to address the positive behavior needs of students with disabilities.



Protocols for Conducting and Implementing Functional Behavioral Assessments and Behavioral Intervention Plans

Under IDEA, if behavior impedes a student's learning or that of others, the IEP team must consider the use of positive behavioral interventions and supports to address that behavior. In such circumstances, a Functional Behavior Assessment (FBA) is used to assess the targeted behavior, antecedent circumstances that trigger the behavior, and helps the team to design the BIP. An FBA and BIP must be in place for students with IEPs who are suspended for more than 10 days for behavior that is manifested by their disability.

The following items are typically included in a BIP:

- Target behavior(s);

[69] OSEP Technical Assistance Center on Positive Behavioral Interventions and Supports (2021). Positive Behavioral Interventions & Supports. See: https://www.pbis.org/topics/disability.

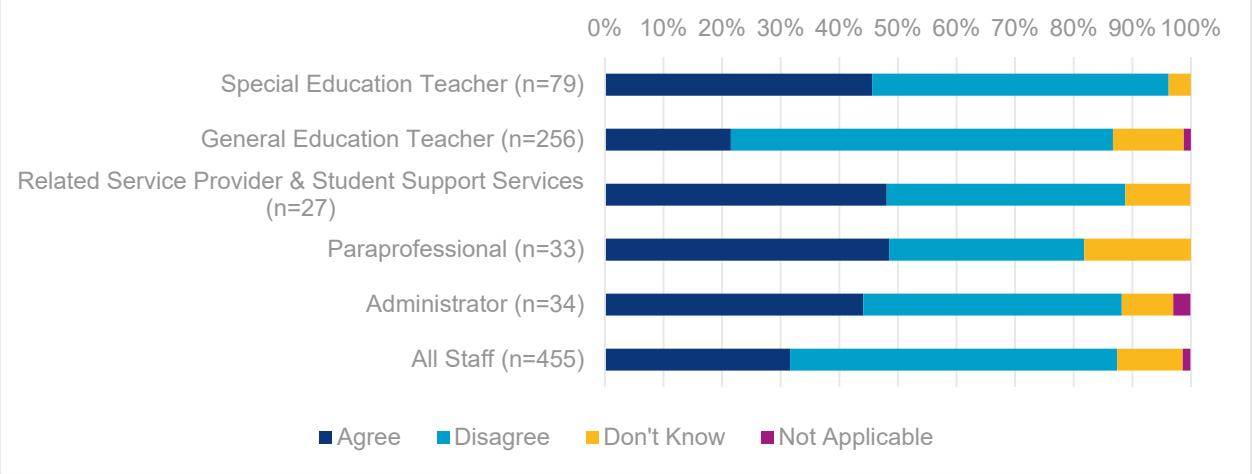
- Documentation of prior interventions and student response;
- Description of positive supports/interventions to be implemented, including the conditions under which the supports/interventions will be implemented;
- Procedures for data collection to evaluate the effectiveness of the interventions;
-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

According to interviews and focus groups with GPS administration, the following information was shared around the provision of behavioral support for students with disabilities:

- "We have a wellness center that we put in last year at the HS…. Where students can be in a smaller pocket. But it's a brand-new program."
- "I think the wellness center with predominately emotional and behavioral issues at the high school serves them well."
- "In terms of behavior, PBIS - five years ago we tried to improve that. Tier 1 is our norm... The administration has brought in the Second Step social-emotional learning (SEL) curriculum. We actually added 30 minutes of SEL a day to implement PBIS across the school. I's a difficult thing to do. Since most of my teachers have been here a while, they have the buy in. We do have a behavior team, where teachers can go and bring a student to the table and discuss the challenges that we're having with the student. We have a sped coach (BCBA), she's not here on the premises but as a consultant we can call her."

In the GPS staff survey, staff were asked to agree or disagree with the following statement: "Students with IEPs have adequate services in place to manage challenging behavior in the classroom." More than 45 percent of special education teachers agreed, while approximately 20 percent of general education teachers agreed with the statement.

Exhibit 67. Staff Survey: Students with IEPs have adequate services in place to manage challenging behavior in the classroom.



Credit Recovery Programming for Students with Disabilities

GPS has a high school credit recovery program for all students, including students with disabilities, located at the Windrose School. The Windrose School is in a separate building from Greenwich High School. As a credit recovery program, the school is in its fourth year of existence. According to administrators, there have typically been approximately 35 students enrolled each year. Many of its students previously attended school inconsistently, putting them at risk of not graduating on time. In addition, many of Windrose School's students also have IEPs. Windrose utilizes a rolling admission process, which has differed from past years where enrollment has only occurred at the beginning and mid-points of the school year. Many of its students participate in internship programming. Staff and administration spoke highly of the achievements of students at Windrose, speaking to the successful outcomes of its students, primarily graduation. During PCG's classroom visit at Windrose, staff spoke of the struggles that the COVID-19 Pandemic placed on its students and staff on many aspects of its programming.

Coordinated Early Childhood, School to School, and Postsecondary Transition Activities

Early Childhood

GPS offers an integrated preschool program. The program is located among four schools: the Hamilton Avenue School, the New Lebanon School, the North Street School, and the Old Greenwich School. GPS offers a lottery for students without IEPs to attend the program. Students with IEPs for preschool instruction do not participate in the lottery. According to the District, its program follows the Connecticut Early Learning and Development Standards (CTELDS). In addition, the program follows the Documentation and Observations for Teaching System (DOTS), which is aligned to CTELDS. DOTS is used to provide baseline and developmental benchmark data, which is entered into students' learning profiles. These data are shared during fall and spring conferences, as well as at IEP meetings. During interviews and focus groups with teachers and administration, it was shared that 80 percent of students within the preschool program presently meet benchmarks across the standards.

During interviews and focus groups with staff, it was noted by some that there is a "revolving door of children coming in" but staff do the best they can to project need. Staff indicated the program is completely inclusive. Administrators shared that preschool sites have been closed or changed to meet the physical access needs of students with disabilities. Sites have also been closed in the past because of low lottery participation by families of students with typically developing children.

During classroom visits, PCG noted the atypical situation that COVID-19 presented. The GPS preschool programs are typically "station based" where students work together engaging in thematic programming within different parts of the room. Because of social distancing within the classrooms PCG visited, teachers creatively designed individual boxes containing learning materials for each student in lieu of station-based activities. The pre-K teachers PCG met with were experienced, committed, and long-time staff members of the District. However, it was difficult to observe "typical" pre-K activities due to COVID-related restrictions.

Post-Secondary Transition

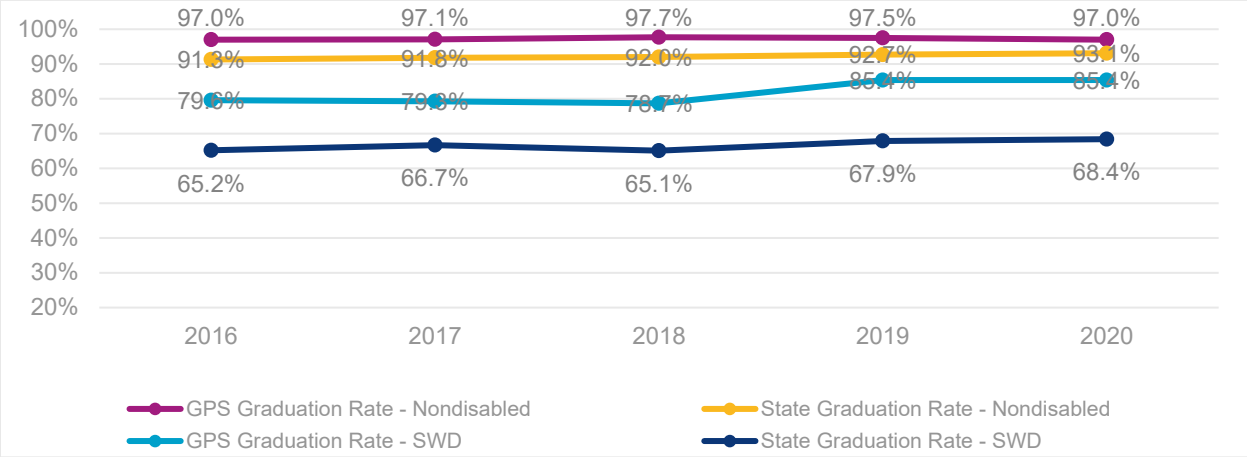
GPS provides post-secondary transition programming through its Community Connections program. This program is specifically for students ages 18-21 years with IEPs. According to district representatives, students participate in job training, volunteering, and attending classes at Manhattanville College, UCONN Stamford, and NCC. Students also engage in recreation activities within Greenwich. According to some staff, this has created a challenge as it would be preferred to have a site where students can engage in more daily living activities (e.g., a site with a "model apartment" where students can increase independent living skills). Staff indicated that the addition of a van and paraprofessional staff licensed van drivers has enhanced the program.

PCG visited the Community Connections program during COVID. However, the impact COVID had on the program was significant as many of the typical work sites and activities that students would be engaged in were closed. Teaching staff and paraprofessionals supported daily living activities on-site and noted they were still going out into the community, socially distanced. However, PCG was unable to visit under those circumstances.

Graduation Rates

Between 2017 and 2020, the percentage of GPS students with IEPs graduating from high school in four years was above the overall statewide graduation rate.[70] Since 2016, the percentage of GPS students with IEPs graduating from high school increased by 5.8 percent. When compared to their nondisabled peers, GPS students with IEPs graduated at a lower rate. In 2020, the difference between the percentage of students with disabilities graduating was 11.6 percentage points lower than students without IEPs.

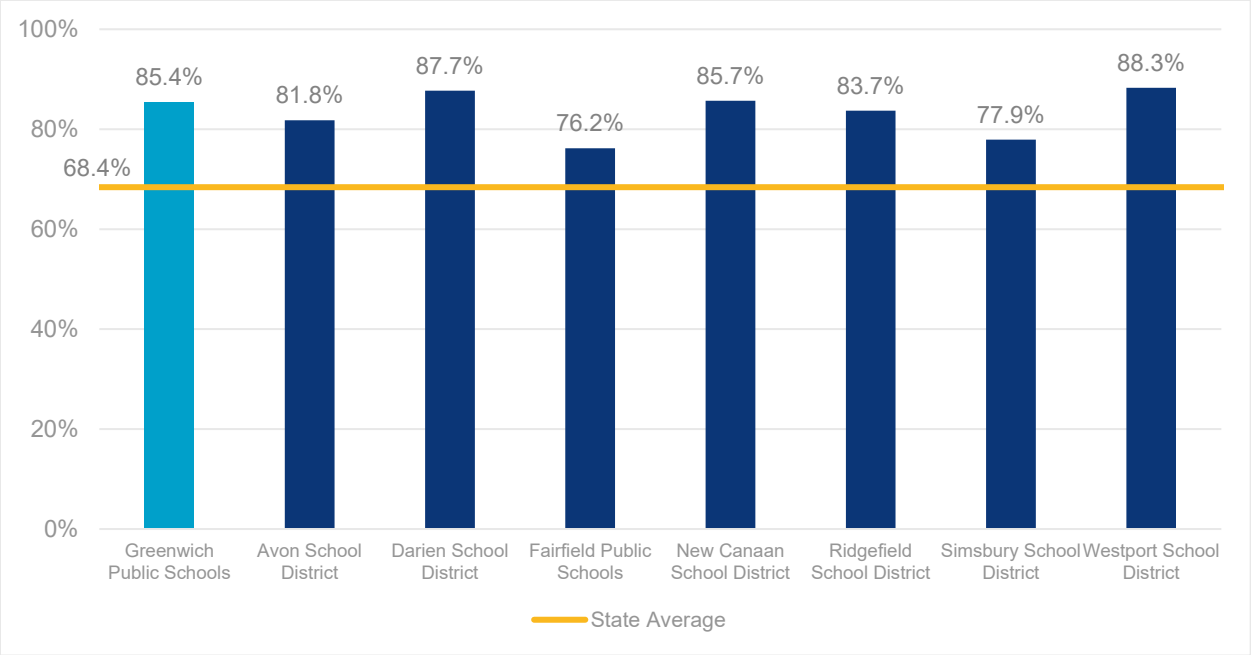
Exhibit 68. Percent of GPS Students with and without IEPs Graduating from High School Compared to State, 2016-2020



When comparing GPS graduation data to seven comparative Connecticut districts, GPS had the fourth-highest rate (85.4 percent). Westport School District (88.3 percent), Darien School District (87.7 percent), and New Canaan School District (85.7 percent) had slightly higher graduation rates than GPS. The following districts had lower rates of graduation for students with IEPs: Avon School District (81.8 percent), Simsbury School District (77.9 percent), and Fairfield Public Schools (76.2 percent). All of the comparable school districts had graduation rates higher than the state average of 68.4 percent for students with IEPs.

[70] Graduation and drop out data obtained from EdSight: http://edsight.ct.gov/SASPortal/main.do

Exhibit 69. Percent of Students with IEPs at GPS and Comparable Districts Graduating from High School, 2020



Shared Accountability and High Expectations

As we constantly seek to increase educational attainment and student achievement, particularly for students with disabilities, current national achievement levels for students with IEPs continue to lag significantly behind those of students without IEPs. It is critical that we not only look at the effect of research-based instructional practices on academic achievement but also at other factors that are likely to increase the trajectory of learning. As educational leaders are being held more responsible for academic growth, it is necessary not only to adequately identify those factors but to understand how a culture of academic optimism can cultivate a growth mindset.

Academic Optimism

Dr. Wayne Hoy and his colleagues suggest that connecting three important characteristics of schools can produce a potent and positive influence on academic achievement, even in the face of low socioeconomic status, previous performance, and other demographic variables such as school size or minority enrollment.[71] Hoy's definition of "academic optimism" is grounded in social cognitive theory and positive psychology. It embraces the following characteristics:

- **Academic emphasis:** The extent to which a school is driven by a belief system that includes high expectations for students to achieve academically
- **Collective efficacy of the faculty**: The belief that faculty can make a positive difference in student learning
- **Faculty's trust in parents and students:** Faculty, administrators, parents, and students work together to improve student learning; trust and cooperation among parents, teachers, and students

[71] Hoy, W. K., Tarter, C. J., & Woolfolk Hoy, A. (2006). Academic optimism of schools: A force for student achievement. Working Paper. The Ohio State University. http://www.waynekhoy.com/school-academic-optimism/

influences factors such as student attendance, persistent learning, and faculty experimentation with new practices

Academic optimism involves a shared belief among faculty that academic achievement is important, that the faculty has the capacity to help students achieve, and that the students and parents can be trusted to cooperate with them in the effort. In brief, there is a school-wide confidence that students will succeed academically. A school community with high academic optimism believes that faculty can make a difference, and all students can learn and achieve high levels of academic performance. Findings from research showed a significant positive relationship between teachers' academic optimism and students' academic achievement.

Growth Mindset

Dr. Carol Dweck's research on fixed versus growth mindset complements Dr. Hoy's work. Dweck's research supports that in a fixed mindset, students believe their basic abilities, their intelligence, their talents, are just fixed traits. They have a certain amount and "that's that," and then their goal becomes to look smart all the time and never challenge themselves in order to prevent others from thinking they are not smart. In a growth mindset, students understand that their talents and abilities can be developed through effort, good teaching, and persistence. They believe everyone can get smarter if they work at it. Teachers who believe in a growth mindset understand that all students can learn, which supports the construct of academic optimism. As teachers and students begin to believe that hard work, perseverance, and belief can change the student growth trajectory, a paradigm shift will take root within each school leading to maximum student and teacher success.[72] Students who believe (or are taught to believe) that intellectual abilities are qualities that can be developed (as opposed to qualities that are fixed) tend to show higher achievement across challenging school transitions and greater course completion rates.[73]

A culture of academic optimism in special education will create an environment where a growth mindset can be cultivated. This sets high expectations for the instruction, supports, and services delivered to students with disabilities, which will lead to greater student achievement. The development of a growth mindset is critical for all students, including students who struggle and students who are high achievers.

District Practices

As stated earlier in discussing the district's continuum of services, over the past twenty years the GPS PPS Office has prided itself on promoting inclusive education for students with disabilities. Through information gathered from interviews and focus groups with administrators and staff, the District claims it has intentionally shied away from creating programs that "label students." District administrators assert they have made a concerted effort to provide special education instruction and services in settings with typically developing peers.

However, at the same time, as learned through interviews and focus groups and witnessed during classroom visits, the district has not championed the use of teaching strategies to support robust inclusive instruction. In particular, the District leverages a collaborative teaching model, vis-à-vis Academic Labs, at the middle and high school level. This model has not adhered to best practices that promote general education teacher/special education teacher partnerships and frequent collaboration. Subsequently, this has created learning environments, especially in the middle and high schools, that are "inclusive" in name, but in reality have a disproportionately high number of students with IEPs and 504 plans, all the while being taught by general education instructors who are not trained to support the needs of students with disabilities. In these settings, PCG saw general education teachers making concerted efforts (but struggling) to support the unique learning needs of students with disabilities. Under such circumstances, the District's intent to be

[72] Dweck, Carol. S. *Mindset: The New Psychology of Success*. Constable & Robinson Limited, 2012.
[73] Yeager, David Scott; Dweck, Carol S. Mindsets that Promote Resilience: When students Believe that Personal Characteristics Can Be Developed, Educational Psychologist, v47 n4 p302-314, 2012.

inclusive has not fulfilled the true vision of inclusivity, which includes the physical and human resources necessary for all students to succeed. Although teachers in these settings repeatedly reported that classes such as these promoted a culture of inclusive beliefs (e.g., "these students are our students"), with little fault of the general educators, these settings struggle to promote a growth mindset. Instead, these classes reinforce the idea that special education is a "place" and not a service, undermining inclusivity and stunting academic optimism. These circumstances can change with a districtwide will and intent to better understand critical teaching and learning needs and to address them expeditiously.

Furthermore, the District has promoted a label for students with low incidence disabilities as being "comprehensive." Several times, throughout almost all interviews and focus groups, PCG repeatedly noted the use of administrators and staff describing children as "comprehensive," "very comprehensive," or "mildly comprehensive" with little delineation of associated needs, instruction and support structure. In addition, "comprehensive" students are educated in settings often referred to as "comprehensive programs" or "resource rooms." In these settings, students with low incidence disabilities learn together. Although District representatives rightfully resist the creation of programs that "label students," staff struggle to provide consistent and effective support for each student with unique learning needs, such as autism. In its effort to resist the use of disability labels to drive instructional settings, the district's use of "comprehensive" and its associated levels of comprehensiveness has not been effective. This, too, undermines inclusivity and stunts academic optimism. These circumstances can change without an overreliance on labeling students. Here, also, there needs to be a will and intent to better understand teaching and learning needs that must be addressed and to take steps to change course expeditiously.

Summary and Implications

Although the District has been notably compliant by reports produced by Connecticut for the State Performance Plan and Annual Performance Report, there is much more worthy of consideration. GPS' PPS Office has been operating under the same leadership for the past 24 years. During that time, the Individuals with Disabilities Education Act has been reauthorized twice by the U.S. Congress, and countless special education regulation changes have occurred in Connecticut in response to these reauthorizations. Yet, in many respects, GPS' special education program continues to operate much like one may have in 1997 – a time when inclusion was still ambiguous, co-teaching was not the norm, specialized supports for low incidence disabilities (e.g., autism) were lacking unless the student was sent out of district, and arcane words were part of the vernacular to describe a student (e.g., "more comprehensive," "mildly comprehensive").

Under the present structure in GPS, some of its most pressing challenges include the following:

- An IEP/PPT process that lacks consistency across the District because staff feel they receive conflicting messages from the PPS Office. In addition, the District has a standard operating procedures guide known as the Red Book that is not used consistently by staff.
- Parental frustrations and overwhelming distrust regarding the PPT process.
- Inconsistent use of MTSS to assist struggling learners or inform the special education referral process. Conflicting and sometimes misconstrued beliefs on how MTSS can potentially support the needs of students who may be identified in the future as students with disabilities.
- Lingering achievement gaps that have plateaued between GPS students with disabilities and nondisabled peers.
- Use of "collaborative classroom" or "resource" special education that are not organized to meet all needs of students with IEPs, and inconsistent specialized supports for students with low incidence disabilities with unique learning needs (e.g., autism).

- By engaging in an unofficial policy of not “labeling” through programming, students with unique learning needs may not be getting access to learning supports and strategies specific to their disability.
- Classes that are inclusionary in name only. Classes in the middle schools and high school where the majority of students have IEPs and 504 plans yet they are taught by general education teachers with limited special education supports.
- Limited co-teaching that occurs at the middle school level only in select classes. It does not exist for elementary schools and high school.
- A collaborative teaching model that is not supported by research in the middle schools and high school known as Academic Lab, where partnerships between general education and special education teachers are not specific to the instruction taking place in the moment and are reactionary in supporting students after academic difficulties have already occurred.
- A belief by some building administrators that the present structure should not change. A fixed mindset is fostered by instruction that is inclusive in name only, where building administrators are not supportive of co-teaching, and a belief by some building administrators that the present structure should not change.

Undertaking reformation of these areas will be critical to the overall success of GPS’ special education program. Embarking on these changes will not occur overnight and will require the leadership and fortitude of the District’s Board of Education, Superintendent, Assistant Superintendent, and new Interim Chief of PPS.

IV. SUPPORT FOR TEACHING AND LEARNING

Strengths	Opportunities for Improvement
• **Superintendent**. The Superintendent is trusted and seen as an advocate for families and students. • **Organizational Commitment**. There is an organizational commitment to improving special education. • **Special Education Leader.** GPS will have the opportunity to create a new vision in special education given the start of a new Chief of Pupil Personnel Services. • **Evolve**. The District will no longer use Evolve in the budgeting process. • **Parent Handbook**. There is a parent handbook available on the District's website. • **Staffing Ratios**. GPS is well-resourced with special education teachers, instructional assistants, nurses, psychologists, and speech therapists.	• **Procedure Guide.** The Red Book is not user-friendly or consistently known by staff, needs to be updated regularly, and should be streamlined for easier access to information. • **Strategic Plan**. Data from the current strategic plan show the continued need to improve stakeholder satisfaction. • **Pupil Personnel Services**. The PPS department structure is unclear, and the office name is not inclusive of its function. • **Special Education Staffing Model**. The current special education staffing model is not well understood or transparent. • **Out of District (OOD) Placement Data.** OOD student data and agreements are not routinely tracked or monitored against financial data.

This section provides information about GPS' support for the teaching and learning of students with IEPs by addressing the following areas: Organization and Collaboration, Human Capital, Professional Development, Technology, Transportation, Policies and Procedures, Fiscal Issues, and Shared Accountability.

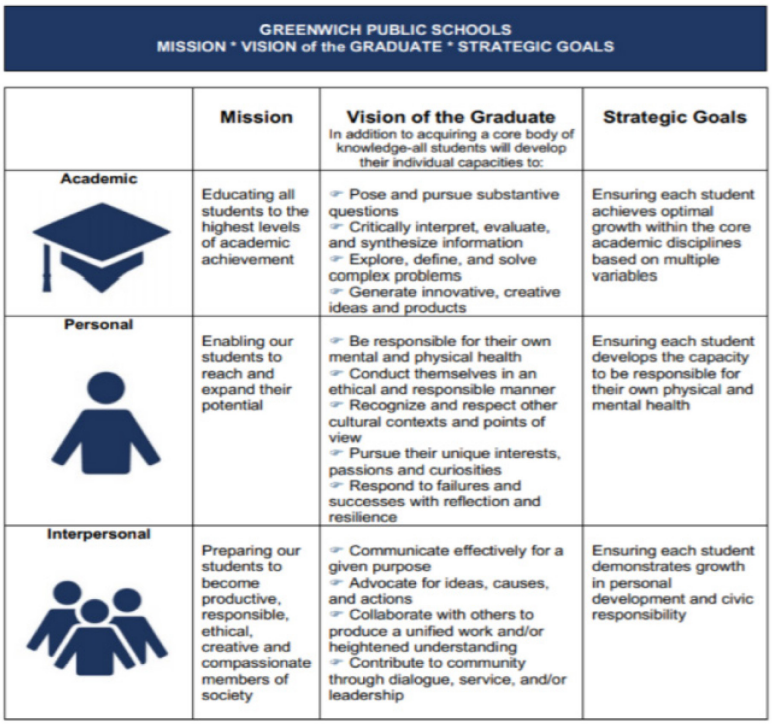
Organization and Collaboration

PCG reviewed how the central office and schools are organized for the effective and efficient administration and operation of specially designed instruction (SDI) and related services. The findings are described below.

Strategic Plan

As noted on the District's website, the 2015-2020 Strategic Plan is designed to achieve the Mission, Vision and Strategic Goals for academic, personal, and interpersonal growth by providing personalized learning opportunities for each student.

A signature part of the 2015-2020 Strategic Plan was the implementation of a Digital Learning Environment (DLE) in GPS, designed to advance the transformation of teaching and learning and to accelerate the academic achievement and personal well-being of all students.



GREENWICH PUBLIC SCHOOLS
MISSION * VISION of the GRADUATE * STRATEGIC GOALS

	Mission	Vision of the Graduate In addition to acquiring a core body of knowledge-all students will develop their individual capacities to:	Strategic Goals
Academic	Educating all students to the highest levels of academic achievement	☞ Pose and pursue substantive questions ☞ Critically interpret, evaluate, and synthesize information ☞ Explore, define, and solve complex problems ☞ Generate innovative, creative ideas and products	Ensuring each student achieves optimal growth within the core academic disciplines based on multiple variables
Personal	Enabling our students to reach and expand their potential	☞ Be responsible for their own mental and physical health ☞ Conduct themselves in an ethical and responsible manner ☞ Recognize and respect other cultural contexts and points of view ☞ Pursue their unique interests, passions and curiosities ☞ Respond to failures and successes with reflection and resilience	Ensuring each student develops the capacity to be responsible for their own physical and mental health
Interpersonal	Preparing our students to become productive, responsible, ethical, creative and compassionate members of society	☞ Communicate effectively for a given purpose ☞ Advocate for ideas, causes, and actions ☞ Collaborate with others to produce a unified work and/or heightened understanding ☞ Contribute to community through dialogue, service, and/or leadership	Ensuring each student demonstrates growth in personal development and civic responsibility

The GPS website has a publicly available dashboard to show the district's implementation progress of the strategic plan. The dashboard displays data in three areas: student achievement, student well-being, and stakeholder satisfaction. The most recent data are from 2019 and show targets and progress made on each indicator.[74] Though one target was not met, the data reflect the overall academic aptitude of GPS's students. Of note are the continued aeras of growth for GPS, with student engagement at 53 percent and stakeholder satisfaction higher for staff and students and lower for parents (staff at 53 percent; parents at 26 percent; and students at 58 percent).

Table 1. GPS Strategic Plan Indicators, 2019

Indicator	Description	Greenwich	Target
Student Academics			
A1 – English Language Arts (ELA)	Percentage of students meeting or exceeding standards for CT Core Exams in ELA	83% Proficient	92% Proficient
A2 – Math	Percentage of students meeting or exceeding standards for CT Core Exams in Math	86% Proficient	92% Proficient
A3 – Science	Percentage of students meeting or exceeding standards for CT Core Exams in Science	81% Proficient	89% Proficient
A4 – Individual Growth	Percentage of K-11 students who met or exceeded growth expectations	81%	90%
A5 – College Preparation Rigor	Percentage of AP exams in which a 3, 4, or 5 was earned	89%	80%
Student Well-Being			
SW1 – Sports Participation	Percentage of students participating in athletics among students in grades 9-12 as compared to the U.S. Department of Education's national average	51%	60%
SW2 – Personal Interests	Percentage of students reporting voluntary participation in any GPS-offered extracurricular	60%	No data available

[74] https://ecriss.ecragroup.com/strategy/Home/Chart?ID=1326&Dashboard=GRE000

	opportunity as compared to the U.S. Department of Education's national average		
SW3 – Student Well-Being	Percentage of students reporting school engagement as measured by the School Belonging Scale from the Panorama Student Survey[75]	53%	No data available
SW4 – Physical Fitness	Percentage of students meeting or exceeding CT fitness standards	69%	75%
SW5 – Community Service	Percentage of students meeting or exceeding 10 hours of community service	35%	40%
Stakeholder Satisfaction			
SS1 - Staff Satisfaction	Percentage of teachers expressing positive sentiments on a composite score from the School Climate items from the Panorama Teachers Survey	53%	80%
SS2 – Parent Satisfaction	Percentage of parents expressing positive sentiments on a composite score from the Engagement of School items from the Panorama Family-School Relationships Survey	26%	30%
SS2 – Student Satisfaction	Percentage of students expressing positive sentiments on a composite score from the Valuing of School items from the Panorama School Survey.	58%	62%

It is noted that the District will soon begin the process of developing a new strategic plan.

District Leadership

GPS is currently led by an appointed superintendent under the direction of eight elected Board of Education partisan members, four of whom are members of the Democratic Party and four of whom are members of the Republican Party. Board members are elected by the citizens to a four-year term of office.[76] Given the political construct of the Board, there is a perception among focus group participants that the structure does not allow for productive oversight. Some believe this has contributed to the high turnover rate of superintendents.

The District and Board of Education have indicated their priorities to be the 2015-2020 Strategic Plan; school start times; the New Lebanon school building project; the Greenwich High School music instructional space and auditorium project; and the GHS fields remediation project. The current Board leadership is reportedly very focused on improving special education in the District and recognizes this is a complex situation that will require a multi-year effort to achieve. The community wants a change in special education, and the Board is ready to act on the recommendations in this report. The focus on special education is anticipated to be reflected in the new strategic plan.

The Board of Education appointed the current Superintendent at the start of the 2019-20 school year. Across all focus groups, participants noted that this appointment is a bright spot in GPS. Based on information gathered from interviews and focus groups, the Superintendent is known to be a collaborator and listener and a trusted partner by parents. The weekly emails initiated by the Superintendent to provide clarity and communication to parents during the pandemic were described as helpful and informative. There is a general sentiment that the superintendent brings the right blend of skill and commitment to GPS, has

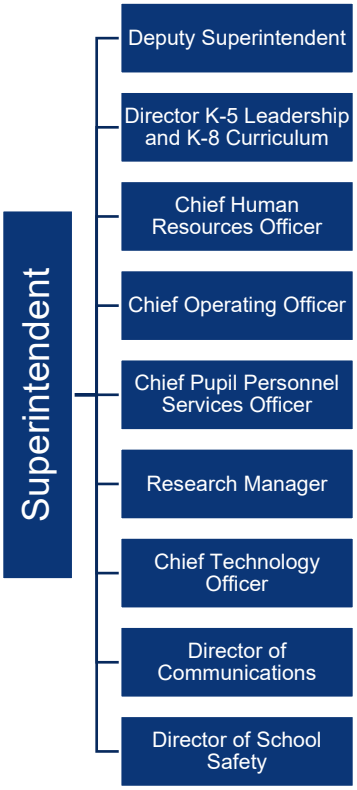
[75] Panorama Education provides survey tools to school districts to measure satisfaction and other indicators among stakeholder groups, including students, parents, and staff. See: https://www.panoramaed.com/surveys.
[76] GPS is one of only two approved districts in the state with this governing board structure. https://www.greenwichschools.org/board-of-education

been a steadfast leader throughout the pandemic, and is committed to bringing about positive change for special education.

From 1997 to the present, GPS has employed 14 superintendents. This turnover has had an impact on the District's ability to carry out initiatives with continuity and to engage in a plan for special education that is responsive to students and the community. Based on interviews with Board Members and long-time staff, past superintendents have acknowledged the challenges with special education, but their tenures have been relatively short, and no substantial changes were made to it over this time. Given the turnover of superintendents, there is a perception among focus group participants that some school staff or certain departments will "wait out the superintendent" and not abide by or follow through with new guidance. Many focus group participants stated, though, that they are hopeful this current superintendent stays with the District and remains energized about addressing the long-standing challenges in special education.

The graphic below depicts GPS' executive leadership team and functional structure. The superintendent has 10 direct reports, one of which is the Chief Pupil Personnel Services Officer.

Exhibit 70. GPS Executive Leadership Organization Chart, 2021-22[77]



Pupil Personnel Services Office

Special education in GPS is managed by the Pupil Personnel Services Office (PPS Office) and is led by a Chief of Pupil Personnel Services Officer. At the outset, it should be noted that the PPS term typically refers to such related services personnel as psychologists, social workers, etc. The term is not commonly used to refer to special educators as they are teachers.

[77] GPS 2021-22 Proposed Budget Book (https://resources.finalsite.net/images/v1614877559/greenwich/drgosapyhopwlfbckflv/BoardBudgetBookFinalV2.pdf). Graphic does not include administrative support.

The District will be appointing an interim Chief of Pupil Personnel Services Officer as of July 1, 2021 as its previous leader announced their resignation in the Spring of 2021. This change in personnel is occurring during long-standing unrest in the community and distrust of the current leadership. Many focus group participants shared that the Office has operated the same way for far too long. Reportedly, some staff who work in GPS are intimidated by certain staff within the PPS Office, and parents are hesitant to speak up because they do not want their child to be punished. Overall, based on interviews, focus groups, and survey data, the PPS Office is seen as combative and unfriendly to parents and staff. GPS special education has reached a crossroads and requires a new leader – a creative, innovative, forward-thinking collaborator – to implement the changes recommended in this report. The job of the incoming chief will be to change the tone of the department and build relationships and bridges with colleagues, parents, and fellow GPS teaching and learning leaders.

The PPS Office is also perceived as being compliance and management-centered, and not a driver of instructional change for students with disabilities. It was reported by several focus groups that when the District eliminated the special education coach positions following budgetary reductions, the instructional focus of the office diminished. The special education philosophy in GPS has long been known as “fully inclusive.” This approach has both built a sense of community and belonging for students with disabilities yet, neglected the development of flexible and targeted levels of specially designed instruction to meet specific student needs. As a result, there is a perception that the only way for a family to receive individualized supports is to seek an out of district placement. Given the impending leadership change, the District has the opportunity to chart a different course and to create a new vision with student achievement and positive behavior and well-being at the forefront.

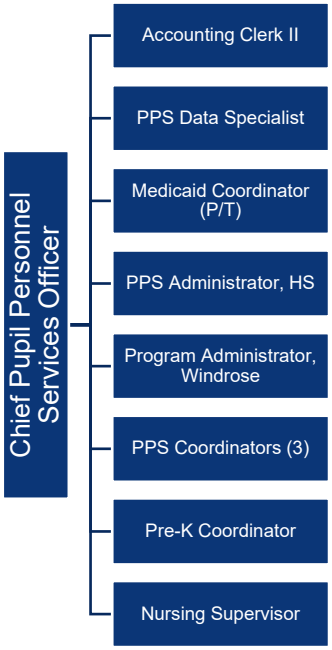
As the Office grows under the direction of a new chief, there are several key areas to address immediately:

- **Establishing an unrelenting focus on instruction, services, and outcomes**. Focus groups consistently mentioned that they hoped the new chief would begin to resolve the disconnect between the special education department, curriculum department, schools, and community. This is a critical first step to developing a plan for improved academic and functional outcomes for students with disabilities.
- **Setting a clear, measurable, and long-term vision**. Focus groups participants shared their perception that PPS currently functions in a piecemeal manner, lacks a cohesive vision, and is reactive. Essential to the new chief’s job will be the development of a unified, collaborative vision with clear expectations around the office’s goals for the next 3-5 years.
- **Fostering partnerships and conducting public outreach.** Focus group participants noted a lack of transparency around special education matters, from an unwillingness to share data to a perceived confrontational manner when asked for more information about academic programming or why evaluations were delayed. There is an opportunity for future Office administration to ensure it collaborates with other departments and parents, remains open to differing points of view, and is transparent in its actions.
- **Operating with a sense of urgency**. Focus group participants expressed significant concern that change is slow within special education and that without a faster pace to restructure the department and address the recommendations in this report, current issues will worsen.

PPS Office Staffing

The PPS office has 43 staff members. The following is the PPS leadership organizational chart shown in the 2021-22 GPS Proposed Budget Book:[78]

Exhibit 71. PPS Office Organization Chart, 2021-22[79]



The following is the organizational chart provided by GPS for this Office for the purposes of this review.[80] The supervisory structure within the department is not clear from this document. It appears to correlate, but not align, to the organization chart provided in the proposed budget book. The Chief Pupil Personnel Services Officer appears to provide direct supervision to most staff, including administrative personnel and PPS coordinators, among others.

Exhibit 72. PPS Office Organizational Structure, 2020-21[81]

Chief Pupil Personnel Services Officer (1 FTE) **Administrative Support (5 FTE)**				
PPS Coordinator **(1 FTE)** ○ Preschool classes at New Lebanon, Hamilton Ave., North Street, and Old Greenwich	**PPS Coordinator** **(1 FTE)** ○ Cos Cobb ES, Hamilton ES, International School at Dundee, Julian Curtiss ES, New	**PPS Coordinator** **(1 FTE)** ○ Glenville ES, Old Greenwich ES, Parkway ES, Riverside ES,	**PPS Administrator** **(1 FTE)** ○ Greenwich HS **PPS Administrator** **(1 FTE)**	**PPS Coordinator** **(1 FTE)** ○ Evaluation Teams ○ Assistive Technology

[78] Names were removed and Full Time Equivalent (FTE) counts added.
[79] GPS 2021-22 Proposed Budget Book (https://resources.finalsite.net/images/v1614877559/greenwich/drgosapyhopwlfbckflv/BoardBudgetBookFinalV2.pdf). Graphic does not include administrative support.
[80] Names were removed and FTE counts added.
[81] As of 11/17/2020.

○ Preschool intake ○ Community preschools ○ OT/PT	Lebanon ES, North Mianus ES, North Street ES ○ Statewide assessments	Central MS, Eastern MS, Western MS ○ Extended School Year	○ Community Connections ○ Windrose	○ Hearing/Vision Services ○ Extended School Year ○ Out of District/ Settlements ○ Professional Learning ○ Behavior Support Team

School Nursing Supervisor (1 FTE) **Coordinator of Guidance (1 FTE)** **Program Associates (3 FTE)** ○ Psychology ○ Social Work ○ Speech Therapy	**Private Schools (1 FTE)** **Preschool and Parent Support (6 FTE)**	**Evaluation Teams (9 FTE)** **Medicaid Reimbursement (1 FTE)**	**Teacher of the Hearing Impaired (1 FTE)** **Teacher of the Visually Impaired (1 FTE)** **District Social Worker (1 FTE)** **Frontline/IEP Direct Support (1 FTE)**

Behavior Support Team [82]				
PBIS/SWIS (1 FTE)	**SEL (1 FTE)**	**DT/PMT (1 FTE)**	**DT/ABA (1 FTE)**	**FBA/BIP (1 FTE)**
○ Glenville ES, New Lebanon ES, Cos Cob ES, North Mianus ES, Central MS	○ Greenwich HS, Eastern MS	○ Julian Curtiss ES, North Street ES, Riverside ES	○ Preschool ○ Hamilton Ave.	○ Parkway ES, International School at Dundee, Old Greenwich ES, Western MS

Overall, there are four PPS Coordinators. Two of the coordinators each support seven elementary and middle schools, and one also supports Extended School Year (ESY). Another coordinator supports district and community schools with preschool classes, preschool intake, and occupational/physical therapists and their related activities. The fourth coordinator supports evaluations with 9 FTE team members, assistive technology, hearing/vision activities, ESY, and out-of-district placements and settlements. The coordinators also lead specific district-wide initiatives, such as statewide assessments, professional learning, etc.

The Office has two administrators. One administrator who supports the high school also reports to the school principal, and the second administrator supports Community Connections and Windrose. Other staff in the office are two teachers (teachers of the hearing impaired and teachers of the visually impaired), a nursing supervisor, a guidance coordinator, a district social worker, three program associates (one each for psychology, social work and speech therapy), six FTE staff who support preschools and parents, and two FTE personnel who provide operational support for Medicaid and for the district's present online IEP case

[82] The following are acronyms included on the organizational chart above: Positive Behavior Intervention Supports (PBIS), School-wide Information System (SWIS), Social Emotional Learning (SEL), Discrete Trial (DT)/Prelinguistic Milieu Teaching (PMT), Discrete Trial (DT)/Applied Behavior Analysis (ABA), Functional Behavior Assessment (FBA)/Behavior Intervention Plan (BIP)

management system, Frontline/IEP Direct. The PPS Administrator for the high school reports to both the Chief Pupil Personnel Services Officer and the building principal.

A behavior support team is composed of four full time equivalent (FTE) staff members charged with specific programs and the support of those programs within certain schools.

On the GPS website, there are separate office pages for PPS, Student Support Services, and Integrated Preschool, though these offices are all overseen by the Chief Pupil Personnel Services officer.

PPS Support to Schools

In GPS, the role of the PPS coordinator is to help problem-solve complex special education issues with building leaders and provide technical assistance to special education teachers. Along with assistant principals (AP), the PPS coordinators review IEP goals and objectives, due process cases, and students who are coming up for an evaluation. At times, the PPS coordinators are invited to PPTs, especially if the AP is new to the role of overseeing special education and needs assistance with navigating the logistics of a PPT. The PPS coordinators are physically in buildings at least weekly for a standing meeting with the AP and/or other school team members. These meetings are opportunities for school-based staff to ask questions if they need clarification regarding a process or to seek guidance if the school team feels they have exhausted their options. Even if they are not in the building, PPS coordinators are in regular communication with school staff and are described as “sounding boards” for school leaders.

School-based focus group participants spoke highly of the PPS coordinators and the support they provide to their schools. There was a general acknowledgment that PPS coordinators are stretched thin, with many competing priorities, and are not able to support special education teachers as much as is needed. Several years ago, there were special education coaches that provided more specific assistance to special educators, but those positions were reduced and finally eliminated. PPS coordinators are doing their best to fill this role now in addition to their other duties. Without the coaching positions, support for new teachers and for improving instructional practices is reduced. It was also reported that several principals and APs served as special education coaches in the past, so they come to their roles with a deep wealth of special education knowledge. Serving as a special education coach was a starting point for many to begin their administrative careers.

Several focus group participants cited that an ideal model for special education would be to bring back at least a few special education coaches to work under the PPS coordinators. This would allow the PPS coordinator to go into buildings to identify issues, as they do now, and then have a coach deployed to the schools for follow-up and teacher training.

Focus group participants also noted the competence and professionalism of the behavior support team. This team, too, is reportedly pulled in many directions and have insufficient time to provide limited follow-up in schools.

School-Based Special Education Leadership

School-based special education in elementary schools and middle schools is led by the AP in each building. In some schools, the AP partners equally with the principal, while in others, the AP leads the program and chairs PPT meetings. Special education is managed by each “house” within the high school and a high school special education administrator who dually reports to the school and to the PPS Office. Almost one-third of principals were once APs, and some bring prior experience in special education through having served as special education coaches as well.

Based on information gathered from interviews and focus groups, those who are new to the role often feel unprepared to run PPT meetings that include lawyers and advocates, especially if they are coming to the work with no special education background. They rely heavily on their PPS coordinators and IEP monitors

in these situations and on reading memos and other background information to orient themselves to the special education process.

School-based focus groups generally spoke highly of the support provided for special education in their school. In most cases, communication is shared regularly, and APs are available for problem-solving. All schools referenced routine meetings in which information and District updates were shared. Many mentioned that APs could benefit from meeting with each other more regularly to share ideas, though finding the time to coordinate this is an obstacle.

Director's Advisory

Each month, the Chief Pupil Personnel Services officer and relevant staff meet with school principals and/or APs to answer questions and share information about special education. These meetings are referred to as the Director's Advisory and cover a wide range of agenda topics, from updates on state regulations and policies to professional development to staffing and service delivery. The meetings are designed to provide problem-solving around student-specific concerns as well as to clarify procedures for IDEA compliance.[83] At times, the focus is on "hot topics" in the field of special education. Other times, the group pulls IEPs and reviews them together, discussing quality goals, accommodations, and modifications. School-based administrators shared that these meetings are useful and an opportunity for them to engage in professional learning specific to special education. It is the responsibility of each attending school leader to take the information back to their buildings and share it as appropriate.

Based on the agendas from the past several years of Director's Advisory meetings, an average of 20 topics were covered in each session. Examples of topics addressed over the past several years (prior to the pandemic) included: Section 504, occupational and physical therapy updates, parent communication, bussing procedures, common core standards, PPS goals, GPS' IEP case management system (IEP Direct), preschool bridging to elementary school, and Medicaid. During the pandemic, topics shifted to remote social groups, remote physical therapy expectations, remote meeting participation, and other special education instructional and compliance topics.

Communication to Schools

Focus group participants said that the PPS Office communicates with that schools primarily via email. Emails are generally sent to APs, who are responsible for disseminating the information to others. Many shared that there should be a better, more systematic way of pushing out information to schools. For the 2020-21 year, the PPS Office started a newsletter to try to consolidate information.

Other school-based staff said they do not see or hear much from the PPS Office, and "as you go up the chain, things get lost." The only communication these staff noted were requests to attend PPT meetings.

Human Capital

Staff Hiring and Retention

GPS is one of the highest-paying districts in the region and generally does not have recruitment or retention challenges. According to focus group participants, open positions come up rarely and are filled quickly with top candidates, despite having to compete with other districts in the area. Many school leaders noted that though their current teaching positions are filled, not much more can be done in their schools in terms of service delivery without hiring more staff. This was highlighted as a major concern for serving fully remote students this year. Special education teachers are reportedly providing services to remote students before school and frequently must shift their schedules to accommodate changing and growing caseloads. This

[83] Program Report PPS/Special Education Work Session Meeting Date: May 17, 2018

was a significant concern at the beginning of the 2020-21 school year, resulting in grievances filed regarding the delivery of special education services.

Many focus group participants shared that the staff in GPS are, on the whole, talented, knowledgeable, and know their craft. Parents shared that the special education teachers assigned to their children are caring, genuinely want to help them, and work hard to meet their children's needs. Pre-pandemic, many parents said that teachers were level-headed, but now they are on the edge and burned out. One parent indicated there are amazing special education teachers at her child's school but is worried the stress will cause them to leave. Service providers were also called out as "amazing and dedicated to what they are doing." They "make up hours, come and help a moment's notice, and generalize skills they are covering to be used in other classrooms." The District contracts to an external organization for occupational therapy (OT) and physical therapy (PT) services. Filling these positions has been a challenge for the contracted company, and some focus group participants shared that it is time for changes to the way this contract is structured and the way OT and PT services are provided. Regarding PT staffing, one participant said: "In the entire school district there are only 2 PTs, and they might as well leave their car running when they come in to provide services." It was also shared that the salary, as well as the standards, for hiring instructional assistants is low.

Additional information about staffing ratios can be found in the Finance section below.

Professional Development

Quality teaching in all classrooms and skilled leadership in all schools will not occur by accident. Instead, 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 (rather than one-day or short-term workshops or conferences) to have a positive and lasting impact on classroom instruction and teacher performance. Research reports that elementary school teachers who received substantial professional development – an average of 49 hours – boosted their students' achievement by about 21 percent.[84] This section addresses professional development in GPS.

Structure and Content of Recent Sessions

The primary focus of professional development for the 2020-21 school year has been on how to teach in a virtual or blended environment because of the COVID-19 pandemic. Training on other content was more limited this year, due to navigating "pandemic teaching" dominating the time available for staff training. Many focus group participants shared that staff development suffered this year as a result. The ability to grow and learn as professionals became secondary to learning how to teach using new and different modes. Professional development sessions at the beginning of the year were heavily focused on technology and how to use tools such as Google Classroom to support the classroom experience. In the past, trainings occurred primarily face to face, with only limited use of blended or online learning options. Given the shifts this year, however, GPS will continue to use virtual training options in the future.

Focus group participants shared several insights, consistent across groups, as to the overall nature of professional development in GPS. First, it was noted that there never seems to be enough time for professional learning. Half-day sessions are limited throughout the year, and professional development at the school level varies by time and subject and is usually driven by the school leadership team. Second, special education school-based staff shared that, while they are included in school-based professional development, at times the content is not made relevant to them. They also noted they do not feel they have enough time to learn specialized content about their roles. Finally, all staff shared that the focus of professional development shifts frequently. One participant said it is like "whack a mole. We attend to

[84] 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.

science first, then something else comes up and we run to that. It's very much ad hoc, and we go down different paths depending on shifting superintendents." Many stated that if special education is to be a priority, the District needs to focus professional development offerings, across all levels and roles, on differentiation and other strategies to support students with disabilities in all classes – so that everyone is, as another participant stated, "moving in the same direction." It was additionally noted by participants that in some cases these sessions should be mandatory.

Focus group participants noted that the PPS Office frequently conducts professional development sessions, both as part of districtwide half-day sessions as well as in support of school-based trainings or meetings. It was also shared that the PPS staff are responsive to schools' or specific teachers' requests for training. In the past, at the beginning of each school year, the PPS administrative staff provided a half-day of professional learning for all new staff on their responsibilities, for both compliance and instruction, regarding the implementation of IDEA and services for the students with IEPs in their classrooms. Depending on the number of new administrators, the PPS Office has also provided special education "boot camp" to review the responsibilities of building administrators regarding the implementation of IDEA and educating students with disabilities in their schools.[85] Additionally, the PPS Office has offered training to support specialist teachers, such as art and music teachers, in working with students with IEPs and on implementing behavior strategies in their classrooms.

Professional development offerings during the 2019-20 school year covered a range of topics. A central focus at all school levels was the Facilitated IEP Process, led by Key2Ed. Each school brought a team to the training, and it was reportedly intensive for administrators. For teachers and paraprofessionals supporting early childhood, professional development in 2019-20 addressed the following areas: 1) process versus product art in the classroom; 2) a project approach book study with *Becoming Young Thinkers a Deep Project Work in the Classroom* by Judy Harris Helm and *Powerful Interactions: How to Connect with Children to Extend Their Learning* by Amy Laura Dombro, Judy Jabion, et al.; 3) an introduction to the facilitated IEP process for preschool staff; 4) expansion of play and language within the preschool classroom. Applied behavior analysis (ABA) training was also offered for early childhood special education teachers, and there was a focus on social-emotional learning for paraeducators.

The following topics were covered during professional development sessions in 2019-20. PCG requested, but was not provided, information about the duration and intended audience of these workshops.

- Twice Exceptional (2E) Autism Series with Dr. Prizant
- A Collaborative Approach to Substance Misuse Prevention
- Applied Behavior Analysis (ABA) Conference
- ABA Training
- Advanced Threat Assessment
- American Speech-Language-Hearing Association (ASHA) Convention
- ASHA's Innovative Methods for Preschool Assessment, Collaboration and Treatment
- Assistive Technology Summit
- Assistive Technology (AT) Focus Group
- Autism-Deescalate Meltdowns & Explosive Behaviors
- C.A.S.P. (Connecticut Association of School Psychologists)
- Conference on Depression & Suicide Prevention
- Conflict Prevention & Resolution through IEP Meeting Facilitation

[85] Program Report PPS/Special Education Work Session Meeting Date: May 17, 2018

- Controversial Issues in Pediatric Audiology
- Capitol Region Education Council (CREC)/Restorative Justice Information for Building Knowledge & Capacity
- Connecticut DOTS Training Workshop
- Dialectical Behavior Therapy (DBT) in Schools
- Deeper Learning Conference
- Enhance Therapy Effectiveness for Auditory Processing Disorder, Memory Deficits, etc.
- Enhancing Your School Nurse Practice
- Estimation of Violence Risk in Adolescents
- IEP & 504 Plan Legal Workshop
- IEP Facilitated Training
- Implementing Augmentative and Alternative Communication (AAC) in the Pre-K & Early Education Classrooms
- Learning & the Brain Structured Writing that Works
- Least Restrictive Environment (LRE)/Inclusive Practice for Students w/Significant Learning Disabilities
- National AT Committee Work Convention
- New School Nurse Workshop
- Orton Gillingham
- Positive Behavior Intervention Support (PBIS) Training
- Pediatric Education Day
- PMT Training
- Practical Strategies for Improving the Behavior of Attention Seeking, Manipulative & Challenging Students
- Providing Registered Behavior Technician (RBT) Supervision in Educational Settings
- School Based Speech & Language Pathologists Conference
- School Psychology Conference
- Strategies & Techniques for Teaching Students Who Read Braille
- School-Wide Information System (SWIS) Training
- Understanding, Defining, Measuring & Increasing Treatment Fidelity
- Westchester Center for the Study of Psychoanalysis and Psychotherapy (WCSPP) Annual Conference - "Clinical Complexities"
- Writing Effective IEPs for SEL Behavioral Skills
- Writing Standards Based IEPs in the Early Childhood Setting

Some participants noted that while PPS offers training, the topics covered are not what teachers need. For example, one teacher stated that there was already a lot of training on STAR as a screener and that other topics should have been prioritized. Others said that they have completed professional development surveys about their needs in the past and do not feel their requests have been honored.

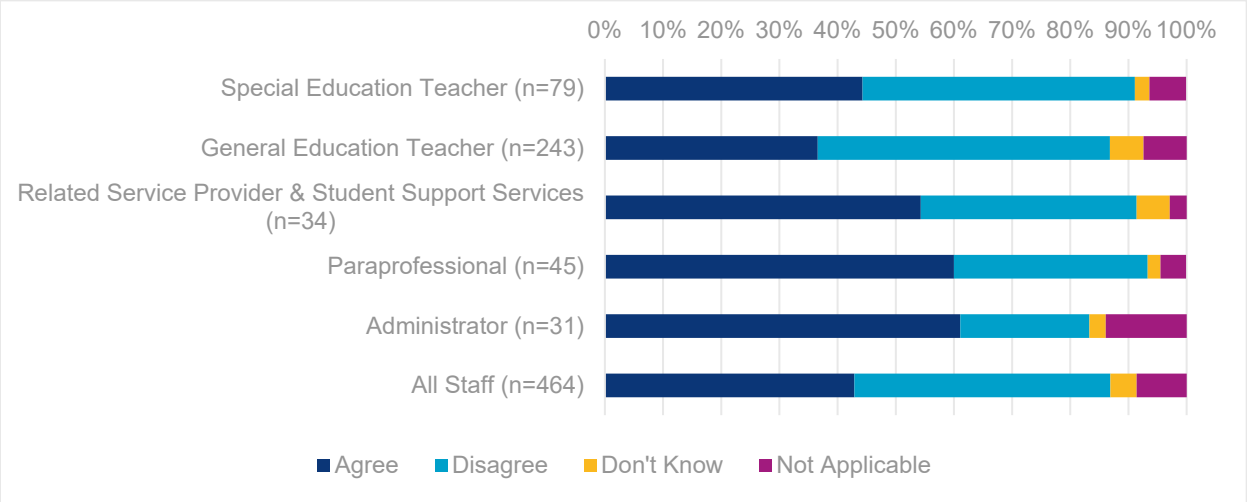
A common theme among special education teachers was the request for more coaching and job-embedded support, beyond one-time or half-day workshops, as well as time to collaborate with paraeducators and/or general education teachers. Some also mentioned the need for a ladder-type approach to training, in that

new staff would receive different training than more veteran teachers. In general, topics and modes of training should be supportive of where staff are in their careers, rather than a one-size-fits-all approach.

Staff Survey Data

GPS staff were asked about their professional development experiences. The following is a summary of responses.

Exhibit 73. Professional Development offerings I have attended enable me to better support the teaching/learning of students with IEPs.



GPS staff were asked whether they agreed or disagreed with the following statement: “Professional Development offerings I have attended enable me to better support the teaching/learning of students with IEPs.” Overall, 43 percent of staff agreed. General education teachers and special education teachers had the lowest levels of agreement (37 percent and 44 percent, respectively). Those with the highest levels of agreement were paraprofessionals (60 percent) and administrators (61 percent).

Areas of Need for Professional Development

Focus group participants across all roles concurred that additional job-embedded coaching support needs to occur in order to encourage teachers’ and paraprofessionals’ skill development. They said that training often feels incomplete, in that the one-workshop approach is insufficient and not individualized to the specific needs of teachers and/or paraprofessionals. General education and special education teachers specifically requested more follow-up and coaching support with opportunities for demonstrating their learning, as well as more information on how to incorporate learned strategies into their daily practice. Some staff mentioned completing surveys in the past about their professional development needs but not feeling that the input was considered by administration.

Through focus group sessions, participants shared the following areas as topics of need and insights for future professional development:

- **Understanding and implementing the IEP.** It would be useful for general education teachers to have a refresher on how to interpret an IEP at the beginning of the school year. Many staff noted that an IEP is a confusing document and that it is challenging to apply what is written in the classroom without sufficient context or discussion. Also, general education teachers stated they often feel unprepared for what students with disabilities are capable of doing in their classrooms. Teachers are not always clear on what students can do based on reading the IEP alone. Regular meetings with the IEP monitor could help with this.

- **Grade level content**. Some participants said that special education teachers need to have more training in grade-level academics so they can feel more prepared to assist general education teachers with developing differentiated and scaffolded curricular resources.
- **Differentiation and implementation of accommodations and modifications**. There was agreement among focus group participants that most special education teachers are knowledgeable about and skilled in how to provide differentiated materials to support general education teachers. General education teachers shared their need for more training on how to use the materials that special education teachers provide (or how to create the materials on their own) and how to make accommodations work in the classroom. One teacher shared that, in the past, she had a student with 29 accommodations on their IEP and that she did not know how to implement them all. She also shared that she would like to know what previous teachers did to fulfill the accommodations so that there would be continuity for the student and consistency of implementation across all teachers. One participant suggested that there should be training at new teacher orientation on how to implement typical accommodations and what they should look like in the classroom. Several others shared that they would like to learn more about how to use technology and specific applications to better support students' accommodation needs.
- **Special education professional assistants (PAs)**. Supporting special education PAs also emerged as a necessary training area. Topics listed by focus group participants included: training on disability manifestations (such as the impact of dysgraphia on writing), more opportunities to learn technology (specifically as more students use iPads and apps), social-emotional skills, and strategies to help students with behavior challenges in the general education classroom.
- **Social-emotional learning (SEL).** Teachers requested more guidance on how to integrate SEL into academic lessons and connect it to personalized learning. The emphasis should be on weaving SEL topics organically into academic lessons so that it does not feel like another new initiative or an extra burden on the classroom teacher.

Staff Survey Data

As part of the staff survey, GPS staff were asked to rank which professional development topics they believe would be the most helpful to them in the role they currently serve. The following is a summary of responses by role, including the percentage of agreement for each topic. Those in bold represent the top three rankings for each role. For special education teachers and related service providers, two options were tied in ranking; therefore, four topics were included.

Table 2. Professional Development Topics: Rankings by School Staff and Administrators

Professional Development Topic	Special Education Teachers	General Education Teachers	Administrators	Related Service Providers	Instructional Assistants/ Paraeducators
Assistive technology	**84%**	53%	69%	**79%**	**87%**
Behavior Intervention Plans (BIP)	61%	52%	65%	52%	60%
Collaborating with paraprofessionals	74%	58%	49%	55%	**90%**
Curriculum Aligned to Alternate Standards and Assessment	63%	**68%**	77%	48%	68%
Data-driven instruction	70%	46%	85%	52%	51%
Differentiated Instruction	68%	66%	74%	52%	84%
Facilitating inclusion in general education	72%	66%	**86%**	**79%**	84%
Federal, state, and district regulations	**76%**	44%	74%	69%	80%

Functional Behavior Assessments (FBA)	60%	42%	62%	45%	63%
Independent living skills	49%	16%	26%	46%	64%
Math interventions	73%	50%	73%	14%	59%
Positive Behavior Intervention and Supports (PBIS)	**76%**	**75%**	**89%**	75%	**90%**
Post-secondary transition planning	39%	13%	25%	25%	44%
Reading interventions	71%	55%	81%	35%	64%
Response to Intervention (RTI) or Multi-Tiered System of Supports (MTSS)	59%	61%	**94%**	**83%**	67%
Specific disability information	**80%**	**77%**	74%	**87%**	85%
Universal Design for Learning (UDL)	74%	57%	83%	59%	73%

The topics of assistive technology, PBIS, and specific disability information were top choices for at least three of the five staff groups.

Technology

The mission of GPS' information technology (IT) department is to prepare all students to use technology as a learning tool and effect a cultural change in the way technology is used by educators and students. The IT department is responsible for managing the enterprise computer infrastructure within the school district. This department has played a critical role during the pandemic, supporting the infrastructure of the District's remote school, setting up classrooms in grades 6-12 with microphones and meeting platforms for hybrid learning, and managing and maintaining devices as part of the 1:1 student device initiative. The GPS website includes links to forms for device lending, frequently asked questions for parents about device usage, guidelines and directions for schools regarding device set-up, and instructions on how to use the accessibility features of both iPads and Chromebooks. The IT department currently operates under GPS, but there have been conversations about potentially consolidating some aspects of it with the town in the future.

Strategy 4 in the GPS 2015-20 Strategic Plan is Data/Information Management. This strategy was identified to support personalized learning through the implementation of systemic data and information systems that gauge progress on student growth for academic, personal, and interpersonal success. The focus primarily was on building a data management system (secure data warehouse) that enabled the development of a student performance growth model, provided professional learning opportunities on how to use data to personalize and drive classroom instruction, and provided access to real-time data to support individualized learning. Focus groups participants shared that central office staff can access information and run data reports for various needs. GPS uses a variety of technology systems and tools to track the information that feeds into the data warehouse. The chart below captures the description of the various portals GPS uses to track data and share them with teachers, students, and parents.

Table 3. GPS Portals, 2020-21 [86]

Technology System	Description	Access		
		Teachers	Students	Parents

[86] https://www.greenwichschools.org/departments/information-technology

Aspen	Student information database where grades are posted.	✓	✓	✓
Schoology	Learning management system where teachers link documents and resources, give quizzes, host discussions, and allow for online submissions of some assignments. This is not where posted grades are stored.	✓	✓	✓
Naviance	Web-based service designed especially for students and parents to organize and document many of the milestones related to Student Success Plans.[87]	✓	✓	✓
ParentLink	GPS' mass electronic notification system, used by district and school leaders to communicate important information to parents, including emergency alerts.			✓

Student IEPs are managed and monitored through the district's online IEP case management system Frontline IEP/IEP Direct, which has a summary dashboard that monitors the compliance of annual IEP reviews, evaluations, and reevaluations. At the beginning of the year, all teachers of students with IEPs are required to log into Frontline to review the IEP. There is a requirement in the system to check that the teacher read the IEP. Focus group participants shared that this is overwhelming for teachers and that meeting with special education teachers to review the IEP document would be useful.

Additional tools to monitor student progress include the ReThink platform and the Linkit Data Warehouse. Many shared that the investment in the Unique Learning System curriculum has been positive in that it not only provides a curriculum for students with significant disabilities but also allows paraeducators and teachers to collect classroom data more easily. The District also routinely uses Google Forms or Sheets to track student progress data, generally at the school level.

Transportation

In Connecticut, the law requires school districts to provide transportation to and from the curb of the student's house (but not beyond) unless the school district makes another arrangement with the parents (CGS § 10-76d (e)). State regulations also require that a student's school district provide transportation needed to implement the student's individualized education program (IEP).[88] In addition, regulations require that:

- Total travel time takes into account the child's disability and does not exceed one hour unless the student's parents agree in writing to a longer time and the State Board of Education approves it;
- Vehicle operators are trained in the specific needs of the child under their care;
- Vehicles used are properly equipped and registered;
- Transportation aides are used when needed to ensure safety or when the student's IEP requires it; and
- Parents are reimbursed if they provide transportation for the students, as long as no parent is required to provide transportation (Conn. Agencies Regs., § 10-76d-19).

[87] A Student Success Plan is an individualized profile of strengths, interests, and milestones created by each student in collaboration with their school counselor, teachers, monitor, advisor or mentor, as well as their parents/guardians.
[88] State Transportation Requirements and Funding, https://www.cga.ct.gov/2012/rpt/2012-R-0085.htm

In addition, school boards have the authority to create their own transportation policies within the confines of the law – for instance, determining what constitutes a hazardous route or setting maximum walking distances.

In GPS, special education transportation is managed by a transportation manager. Among other District transportation responsibilities, the transportation manager partners with the PPS Office to coordinate the unique transportation needs of students with IEPs. According to District administrators, special education transportation is more than 40 percent of the District's transportation budget. Administrators note that transportation is primarily contracted with Student Transportation of America (STA) for approximately 4,965 public and private eligible students. The District also transports 115 students receiving special education services in town and 32 students receiving special education services out of town. Transportation is provided to and from school at no cost for students living beyond the established pupil walking distances within their attendance areas, in addition to transportation services provided for students whose IEP require it. For routes that service students with IEPs, the District also utilizes 16 Type II buses and eight vans, along with monitors as required. [89]

The primary responsibilities of the transportation manager, specific to supporting the needs of students with IEPs, include facilitating the creation of bus/van routes and engaging in the hiring or contracting of bus drivers and vehicles to bring students to and from school (whether that is their home school in Greenwich or an out-of-district placement). The office also develops the bus routes and follows up on customer service needs and contacting parents due to late busses.

The following information was gathered from interviews with GPS administration:

- Parents frequently call the transportation manager with special education transportation questions, and the transportation manager explains what the process is, referring parents to call PPS.
- There is a lack of communication between the PPS Office and the Transportation Office, unless there are complaints.
- There is a lack of standard operating procedures following the PPT team's transportation decision and subsequent arrangement of transportation by the transportation office.
- There is limited adherence to the District's "seven-day rule" of providing the transportation manager seven days to arrange transportation.
- There is limited adherence to the rule that requires State Board of Education approval for travel that is more than one hour, which is noted as a common occurrence in Greenwich due to the number of out-of-district vans in traffic on I-95 and other congested roadways in the vicinity.
- Transportation requests come from a variety of people within the special education office and/or from IEP monitors.

Policies and Procedures

GPS has both policies and procedures to guide the implementation of its special education program.

Three Board of Education policies guide special education in GPS, all of which were adopted on May 17, 2018. These policies include:

- **Identification of special needs and abilities**. This policy directs the superintendent to develop and promulgate regulations and procedures to identify students with disabilities; and develop plans for assessment and evaluation of the specific needs of students identified as having a disability.

[89] GPS 2021-22 Proposed Budget Book:https://resources.finalsite.net/images/v1614877559/greenwich/drgosapyhopwlfbckflv/BoardBudgetBookFinalV2.pdf

The assessment plan shall be a description in ordinary language of procedures, tests, records, or reports proposed for use in student assessments.

- **Preschool special education**. This policy commits the Board to maintaining an early intervention program for preschool-aged children identified through the "Birth to Age Three" screening process under regulations imposed by IDEA, and also requires the program to be based on the "reverse mainstreaming model," which maintains a significant number of nondisabled peers who serve as role models for the students with identified disabilities.
- **Special education**. This policy states that the District will provide a free and appropriate public education and necessary related services to all children with disabilities residing within the District, as required under IDEA, Section 504 of the Rehabilitation Act of 1973, and the Americans With Disabilities Act.

Standard operating procedures provide schools and personnel with the procedural framework necessary to develop supportive, inclusive education programs based on each student's individual needs and to consistently operate across the District. When asked about standard operating procedures, participants across nearly every focus group cited the "Red Book" in GPS. Some said they still use the older, printed version of it. This guidance document, more than 500 pages in length, is a comprehensive, detailed compilation of internal memorandums and instruction on the PPT process, IEP meetings, the IEP document, behavior management, records management, and forms. The Red Book was originally created as a standalone document and distributed in hard copy to administrators and teachers but has since been moved to the district's internal learning management system (Schoology) site. Staff report that it is now divided into several sections with corresponding links. Also posted on the Schoology site are state procedure guides and IEP Direct support materials.[90] Given the complexity and detail of the document, updates to the Red Book have occurred infrequently and require substantial effort.

Focus group participants also referenced other guidance documents, including a placement procedure guide for Advanced Learning Programs and an RTI manual. In the past, there has also been a hard copy book or binder called Parents as Partners that parents received at their first PPT meeting. This resource is now electronic and available on the GPS website.

Fiscal Issues

Though the finances of GPS have shifted over the course of the pandemic, from realized reductions in some areas such as transportation to shifts in others like the creation of Math Interventionist positions from previous coaching roles, long-standing challenges with special education funding have persisted. There is a strong community perception that special education has been understaffed and under-resourced for some time and that the town has not made a commitment to fund it adequately. Many believe this has precluded the District from creating programs that are adapted to meet the reality of students with disabilities today, and thus contributing to the increasing special education out-of-district tuition and associated transportation costs year after year. As one participant shared, "if we started to build strong programs earlier, we won't have lawsuits and those costs. It's about *how* we spend our money, and we should reallocate it in a proactive way." There was also an expressed need for transparency when it comes to special education finances. Some focus group participants shared the difficulties they encountered when trying to obtain information about special education spending and how hard it can be trying to advocate for more funding from the town when costs, like those for out of district placements and settlements, continue to increase.

Though GPS is perceived to be well resourced compared to other districts, it still faces fiscal challenges when it comes to funding overall. For the 2020-21 school year, there was a 0 percent increase in funding for GPS, despite average increases of more than 2 percent required for salaries, out-of-district tuition, and

[90] Program Report PPS/Special Education Work Session Meeting Date: May 17, 2018

other costs. GPS is requesting a 3.97 percent increase from the Board of Estimate and Taxation (BET) for the 2021-22 school year and is working to restore approximately $2.5 million in the upcoming budget cycle for costs that are increasing now that schools are opening up again (e.g., costs of restoring custodial, maintenance, and classroom supplies). The District is also tackling and prioritizing some large capital improvement projects for schools with significant Americans with Disabilities Act (ADA) deficiencies. The feasibility study for two of the designated elementary schools is complete, and the District has now moved to the design phase.

Town Governance, Charter, and Budget Timeline

GPS has a budgeting approval structure with legislative and financial oversight provided respectively by the Board of Estimate and Taxation (BET) and Representative Town Meeting (RTM). As described in the GPS 2021-22 Proposed Budget Book:

> The Town of Greenwich is governed by the laws of the State of Connecticut and its own Charter. The Charter provides for a First Selectman, Board of Selectmen, Board of Estimate and Taxation (BET) and Representative Town Meeting (RTM) form of government. The RTM acts as the legislative unit while the BET is responsible for the proper administration of the financial affairs of the Town. There are 230 members of the RTM and 12 members of the BET. They are elected biennially by the voters, along with the First Selectman and Board of Selectmen. Today, the Town government can be characterized as a decentralized system of overlapping powers and responsibilities. It is also largely volunteer… The Town provides a full range of municipal services, including general administration, education, public safety, public works (building maintenance, highways, waste disposal, engineering), parks and recreation (parks, beaches, golf course, civic centers), health (clinics, laboratory, residential patient care), human services, planning and zoning and libraries. The annual budget serves as the foundation for the Town's financial planning and control. All agencies of the Town are required to submit requests for appropriation to the BET Budget Committee, who, in turn, submit the recommended portion to the full BET. After public hearings, the budget is submitted to the RTM for approval in mid-May. The adopted budget is in effect on July 1st… The BET and RTM meet often to review subsequent appropriations (those under $10,000 can be authorized by the BET; those over $10,000 must also be approved by resolution of the RTM except for labor contracts which are approved for financing by the RTM). Department heads may request transfers of appropriations within a department. Transfers of appropriations within departments of more than $10,000, however, require the special approval of the BET. Management can approve transfers of up to $10,000 but cannot add to the budget.

Because of the layers of approval required to finalize the GPS budget, the budget timeline starts early in the current year to plan for the following year's expenditures. Focus group participants noted that the budgeting process is complicated and does not allow flexibility for easy redirection of funds mid-year when expenses go up in some areas and down in others. Additionally, it is challenging to predict the needs of the upcoming year when the current school year has just begun.

An overview of the GPS budget timeline is as follows:

Exhibit 74. GPS Budget Timeline[91]

The budget is finalized in the summer before the subsequent school year. The process starts with GPS administrators collaborating with school leaders and providing them guidance on how the BET and Board of Education is looking ahead. Budget books are then completed in the early fall for the Superintendent and Board of Education to review. The Superintendent presents the budget in November at Board of Education meeting, and the final budget gets moved to the BET in January. The BET then makes recommendations to the RTM. The RTM either approves it or reduces the amount requested. Final budget approval occurs in either April or May.

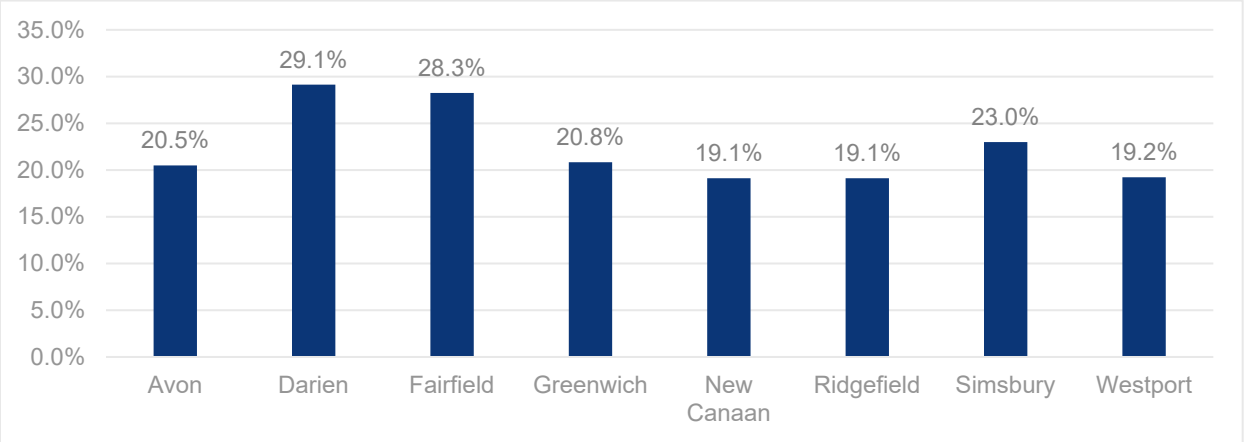
Financial Comparisons

As in school districts across the country, GPS special education frequently experiences expanding costs. Due to the increasing number of students with disabilities in Greenwich, the District has had to carefully manage its resources while aiming to maintain quality programming. The exhibits below reflect fiscal data pertaining to special education spending.

The following exhibit shows the percent of the GPS budget in 2019-20 for the area of special education compared to seven other Connecticut districts.[92] These data show that GPS' special education budgeted rate of 20.8 percent is less than three comparable districts (Darien, Fairfield, and Simsbury). Percentages range from a high of 29.1 percent in Darien to a low of 19.1 percent in both New Canaan and Ridgefield.

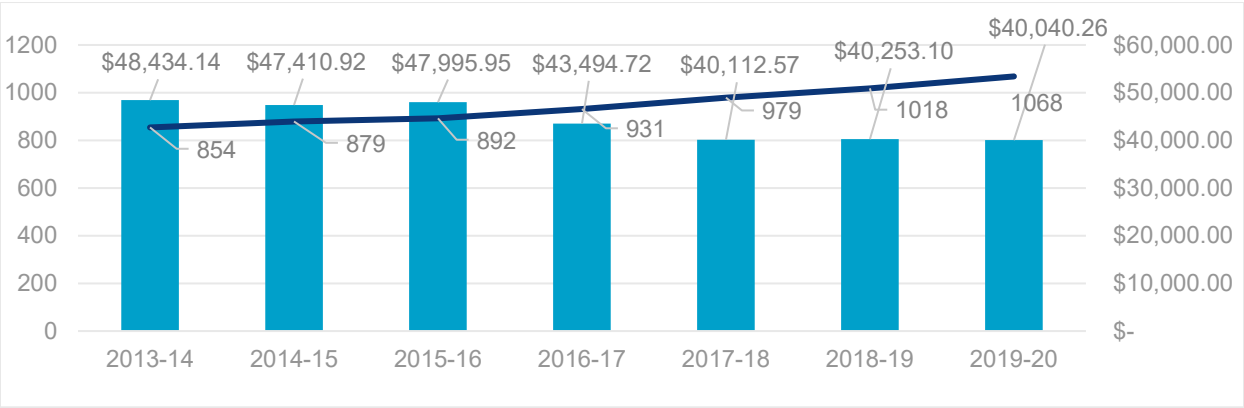
[91] GPS 2021-22 Proposed Budget Book:
https://resources.finalsite.net/images/v1614877559/greenwich/drgosapyhopwlfbckflv/BoardBudgetBookFinalV2.pdf
[92] https://www.csde.state.ct.us/public/dgm/grantreports1/SpTrExpViewRpt.aspx

Exhibit 75. Percent of Special Education Budget of Total Expenditures: Connecticut School District Comparisons, 2019-20[93]



The following exhibit reflects the special education per pupil cost and special education enrollment between the 2013-14 and 2019-20 school years. During this time, the per pupil special education cost decreased from $48,434.14 in 2013-14 to $40,040.26 in 2019-20. At the same time, the number of students with IEPs increased from 854 to 1,068 (an increase of 214 students). Though the District saw a steady increase of students with disabilities each year, the costs per student per year remained below the 2013-14 amount.

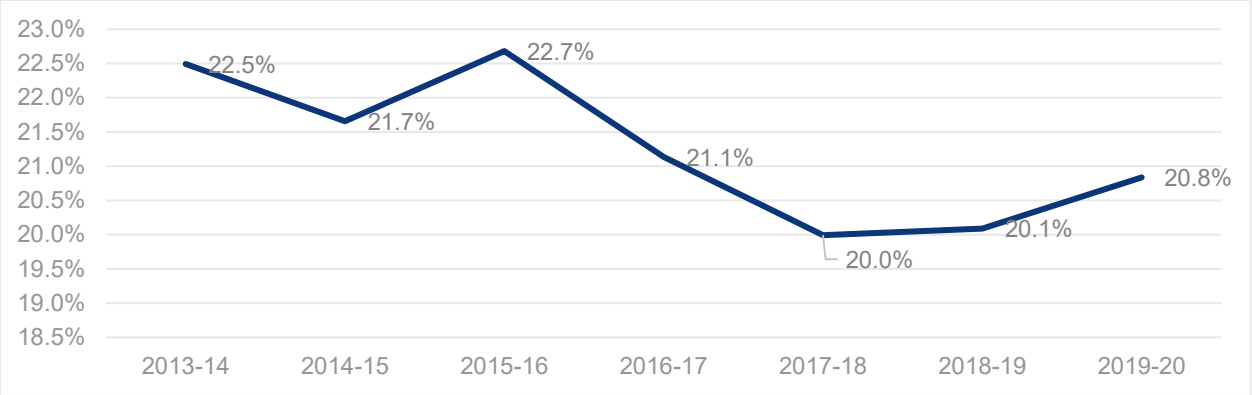
Exhibit 76. Seven-Year Total GPS Special Education Per Pupil Cost & District Special Education Enrollment[94]



The last exhibit shows that the rate of total special education spending has decreased since the 2013-14 school year. In the 2015-16 school year, the budgeted amount reached a high of 22.7 percent. In comparison, the budgeted rate for the 2019-20 school year was 20.8 percent.

[93] https://www.csde.state.ct.us/public/dgm/grantreports1/SpTrExpViewRpt.aspx
[94] https://www.csde.state.ct.us/public/dgm/grantreports1/SpTrExpViewRpt.aspx

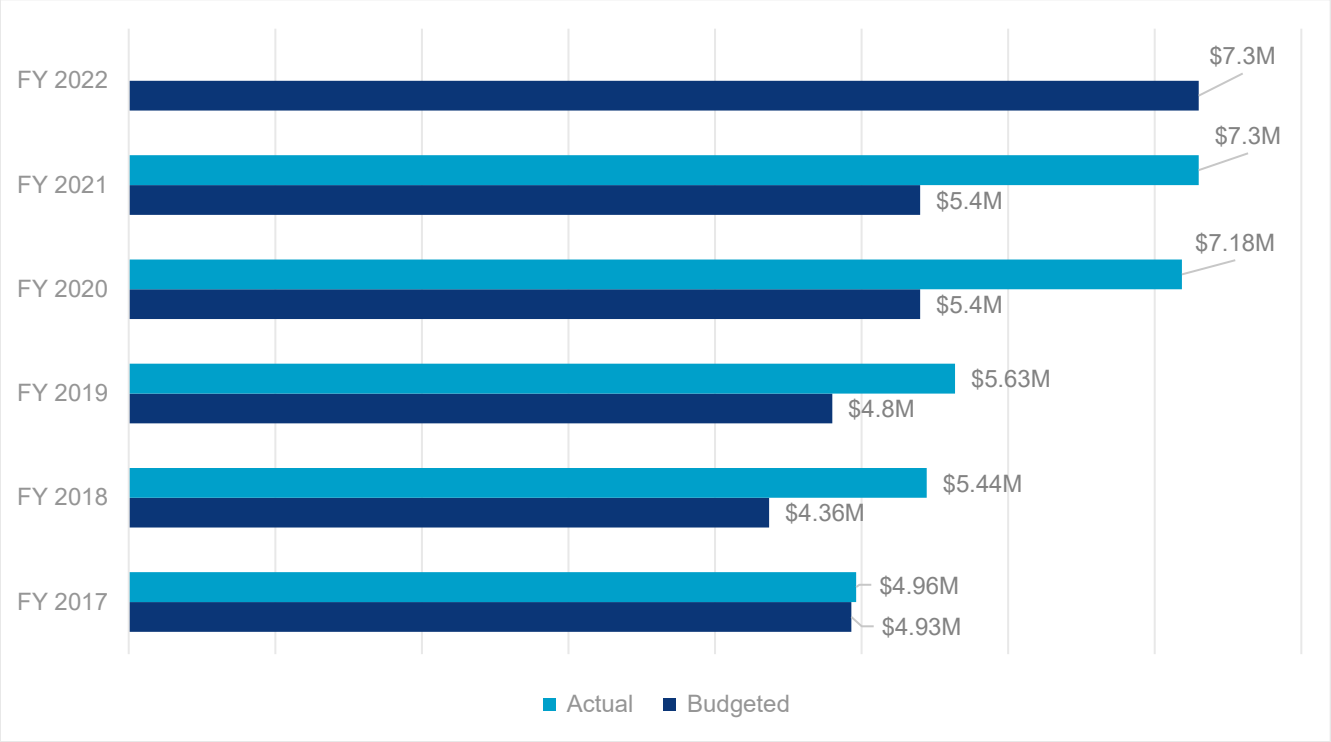
Exhibit 77. Percent of GPS Special Education Spending Over Time[95]



Special Education Out-of-District Tuition

The topic of special education out-of-district tuition was raised by many focus group participants. This is primarily because the budget for this area has grown substantially over the last few years. The following chart shows the increase of actual costs from just under $5 million in FY 2017 to a projected actual total of $7.3 million for FY 2021 – $1.7 million over the budgeted amount of $5.4 million. For FY 2022, GPS is budgeting $7.3 million for this line item.[96]

Exhibit 78. Special Education Out-of-District Tuition Budgeted vs Actual Costs Over Time[97]



[95] https://www.csde.state.ct.us/public/dgm/grantreports1/SpTrExpViewRpt.aspx
[96] FY 22 Proposed Budget Book:
https://resources.finalsite.net/images/v1614877559/greenwich/drgosapyhopwlfbckflv/BoardBudgetBookFinalV2.pdf
[97] https://www.csde.state.ct.us/public/dgm/grantreports1/SpTrExpViewRpt.aspx

This line item captures the tuition costs for students who attend schools outside of Greenwich's public schools, such as approved private, private, nonpublic, or residential schools. Students can be placed in these schools in one of two ways: 1) through placements made by the District following a PPT decision ("outplacements"), and 2) via settlement agreements.

In the 2011-12 school year, there were 31 students in outplacements and an additional 29 students placed in schools outside of GPS through settlement agreements. By the 2019-20 school year, these numbers had increased to 43 students and 52 students, respectively. As of January 2021, there were 29 students in outplacements and 50 students placed through settlement agreements, with an additional nine outplacements and settlements pending.

Table 4. Number of Students in Out-of-District Placements and Tuition Budgeted vs Actual Over Time[98]

School Year	Outplacements	Settlements	Budgeted	Actual
2011-12	31	29	$3,294,503	$4,454,341
2012-13	26	35	$4,100,000	$3,982,803
2013-14	27	42	$4,200,000	$4,651,867
2014-15	32	30	$4,300,000	$4,718,511
2015-16	33	39	$4,500,000	$4,340,658
2016-17	27	36	$4,493,000	$4,962,642
2017-18	34	41	$4,368,901	$5,443,955
2018-19	30	38	$4,800,000	$5,637,125
2019-20	43	52	$5,400,000	$7,185,259
2020-21	29	50	$5,400,000	$7,311,878

It is evident that GPS has closely monitored these costs and tracked the number of students placed in outside schools by category. When asked to provide information about the students in each category, such as disability type, the school attending, or the date of students' next IEP meeting, the information was not available in a comprehensive way. Some data on some students for the 2020-21 school year was provided to PCG, but the information was not complete and required manual tracking and compilation from various sources. Historical data was not available.

District Resource Allocations

There are currently four models used concurrently to allocate school-based staff members. Building-based personnel generally remain unchanged, while the other three categories are modified each year to adjust to changes in enrollment, program, and student need. The models include staffing allocations based on building, programs, enrollment, and student numbers/need.

The following chart shows how various positions are allocated to each school under the four models.

Table 5. District Resource Allocation Model[99]

Allocation Model	Elementary	Middle	High

[98] https://www.csde.state.ct.us/public/dgm/grantreports1/SpTrExpViewRpt.aspx
[99] GPS 2021-22 Proposed Budget Book: https://resources.finalsite.net/images/v1614877559/greenwich/drgosapyhopwlfbckflv/BoardBudgetBookFinalV2.pdf. This format is directly from the GPS Budget Book.

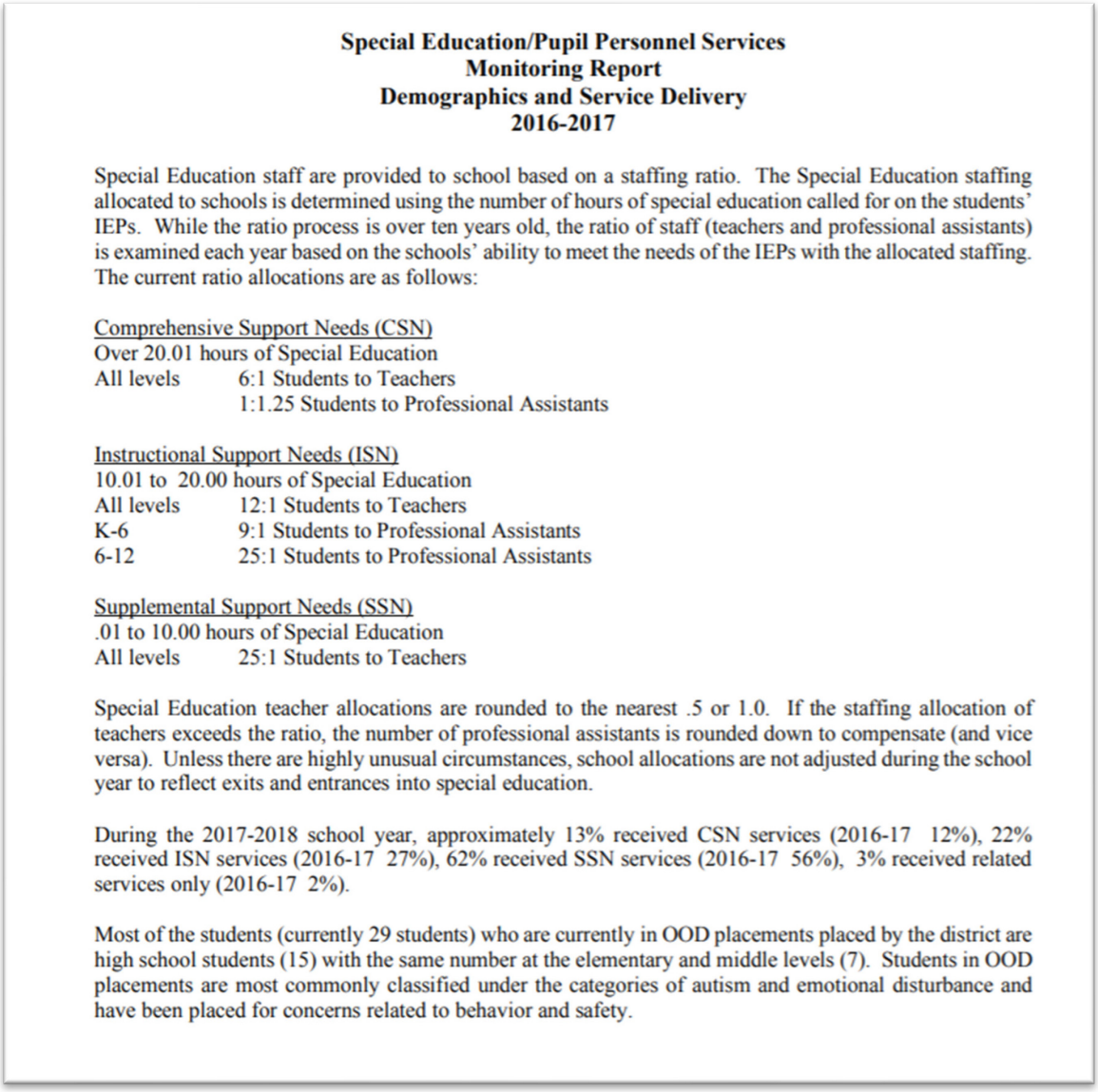
Building Based			
Principal	1 per school	1 per school	1 per school
Assistant Principal	1 per school	2 per school	1 per school
House Administrator	NA	N/A	5 per school
Dean of Students	N/A	1 @ EMS	5 per school
Program Administrators	N/A	N/A	3 per school
Athletic Director	N/A	N/A	1 per school
Office Support	2 per school	3 per school	28 per school
Media/IT Support	2 per school	2 per school	6 per school
Custodian	1 per 18-20K sq. ft.	1 per 18-20K sq. ft.	1 per 18-20K sq. ft.
School Nurse	1 per school	1 per school	3 per school
Program Based			
Guidance Counselor	0 per school	3 each @ CMS and WMS, 4 @ EMS	18 per school
Psychologist	1 per school	1 per school	6 per school
Social Workers	0 per school [100]	1 per school	6 per school
Media Specialist	1 per school	2 per school	5 per school
Program Coordinator/ Administrator	10 for the district		
Literacy Teachers/ Specialists [101]	2 per school	2 per school	2 per school
Instructional Coaches	0	2 for the district	0
Math Interventionist	5 for the district	0	0
Advanced Learning Program [102]	1.7 per school	1	
Foreign Language Elementary School (FLES) [103]	1	N/A	N/A
Mechanics	Distributed as needed	4 per school	N/A
Enrollment Based			
Teachers, core curriculum	20:1	15:1	
Clerical	PT supplemental staff may be assigned based on enrollment	N/A	N/A
Student Need Based			

[100] Social worker funded by grant for New Lebanon School and Hamilton Avenue School.
[101] EMS and feeder schools have 1
[102] ALP staffing is allocated 1.7 FTE for each elementary school, and based on program needs at the secondary level
[103] FLES staffing is based on number of classroom sections at the elementary level with supplemental staffing for the four magnet elementary schools.

Special Education Teachers	Based on number of students eligible for special education
English Learner Teachers	Based on number of students requiring English language services
Professional Assistants	Based on number of students needing additional support

Though Program Based and Enrollment Based allocations can change each year, there is a clear methodology for how these resources are allocated. Student Based personnel change each year based on student need; however, there is currently no transparent, publicly available methodology for how these resources are distributed, what factors are taken into consideration to assign positions, or information on how the positions align to advancing best instructional practices. One focus group participant mentioned that staffing is divided into three categories and described the following: 1) Comprehensive is the most hours, 2) Strategic is the middle, and 3) Instructional is the fewest hours.[104] No additional details were provided by focus group participants as to how what this means in practice. In the 2017-18 report to the Board of Education, PPS provided the following description of the special education allocation process from the 2016-17 school year.[105] It is unclear to what extent these ratios are still used in determining staffing numbers.

[104] PCG was not able to obtain written documentation that used these terms.
[105] Program Report PPS/Special Education Work Session Meeting Date: May 17, 2018



Special Education/Pupil Personnel Services
Monitoring Report
Demographics and Service Delivery
2016-2017

Special Education staff are provided to school based on a staffing ratio. The Special Education staffing allocated to schools is determined using the number of hours of special education called for on the students' IEPs. While the ratio process is over ten years old, the ratio of staff (teachers and professional assistants) is examined each year based on the schools' ability to meet the needs of the IEPs with the allocated staffing. The current ratio allocations are as follows:

Comprehensive Support Needs (CSN)
Over 20.01 hours of Special Education
All levels 6:1 Students to Teachers
1:1.25 Students to Professional Assistants

Instructional Support Needs (ISN)
10.01 to 20.00 hours of Special Education
All levels 12:1 Students to Teachers
K-6 9:1 Students to Professional Assistants
6-12 25:1 Students to Professional Assistants

Supplemental Support Needs (SSN)
.01 to 10.00 hours of Special Education
All levels 25:1 Students to Teachers

Special Education teacher allocations are rounded to the nearest .5 or 1.0. If the staffing allocation of teachers exceeds the ratio, the number of professional assistants is rounded down to compensate (and vice versa). Unless there are highly unusual circumstances, school allocations are not adjusted during the school year to reflect exits and entrances into special education.

During the 2017-2018 school year, approximately 13% received CSN services (2016-17 12%), 22% received ISN services (2016-17 27%), 62% received SSN services (2016-17 56%), 3% received related services only (2016-17 2%).

Most of the students (currently 29 students) who are currently in OOD placements placed by the district are high school students (15) with the same number at the elementary and middle levels (7). Students in OOD placements are most commonly classified under the categories of autism and emotional disturbance and have been placed for concerns related to behavior and safety.

Evolve

For almost 20 years, GPS has used a process called Evolve to allocate special education staff to schools. According to the 2018-19 GPS Budget Book:

> Special Education Teachers and Professional Assistants (PAs) are assigned to schools using a ratio derived from the number of special education hours on the IEPs of each student attending the school building. The number of Professional Assistants is a fixed allocation, adjusted when preschool classes have been added... Schools can use the Evolve model to exchange PAs (3:1) for certified staff on an annual basis (reset each school year).[106]

Under this model, special education PA positions were budgeted and held in reserve at the central office. These positions could then be "traded in" by schools for teachers. Principals who believed they needed a

[106] FY 2019 Budget Book: https://www.greenwichschools.org/uploaded/district/departments/business_services/budget_18-19/2018-19_SUPT_BUDGET_PACKAGE_(FINAL)_11-6-17.pdf

special education teacher could "cash in" three PA positions to hire another special education teacher.[107] Even with the shift to three positions, this model created a budget deficit of at least $25k per position, as three PAs were budgeted at $75k and one teacher was budgeted at $100k+.[108] It was originally set up to retain budgeted non-classified positions and provide flexibility for the difficult to staffing shift from a non-classified position to a classified one. Though the line item for these PA positions is visible in each year's budget book, there is no corresponding detail about how positions in reserve are then moved into a school budget and filled, or what triggers this change to happen. For FY 21, GPS had 166.80 positions budgeted for special education PAs. Of these, 142 were filled PA positions.

For the first time in 2020-21 school year, GPS did not utilize the Special Education Evolve staffing model since the pilot was introduced in 2003-2004. As described in the 2021-22 Proposed Budget Book, "The FY22 Proposed Budget does not include Evolve. The current model is fully understood by the PPS Office. However, it is troublesome from a financial and human resource standpoint in terms of record keeping and clarity between departments."[109]

Focus groups across schools and the central office all described Evolve as "confusing." School staff shared uncertainty regarding how positions are allocated. One said it was "a hard thing for us, because you were always trading in. For a certain number of paras, you could get another person in another domain." Many noted they would like to have a staffing model they can understand. At the District level, there seemed to be an equal amount of confusion. When the superintendent started at the beginning of the 2019-20 school year, the human resources and finance departments struggled to understand how many PA positions were budgeted and how many were filled. At the time, there were 27 positions unaccounted for, totaling more than $1 million in salaries, which was the result of the "cashing-in" process that occurred close to the beginning of the school year. This did not allow time for human resources and finance processes to catch up. This issue has since been resolved, but it remains an example of the system-wide incongruity that stemmed from utilizing Evolve.

School-Based Feedback on the Allocation Process

In addition to strong feedback about the challenges with Evolve, school staff shared concerns about the allocation process and staffing ratios overall. Some staff felt their schools had enough special education personnel, while others believed that despite increasing caseloads there are no corresponding increases in staff to support student need.

The following insights from school staff were shared during focus groups about special education teacher staffing:

Caseloads and Schedules

- "We're all short staffed and our schedules are very tight."
- "Over the years, the District is just not set to meet new students and hire more staff. We could have a comprehensive student walk in at any time and not increase our staff over what was assigned from beginning in the year."
- "The formula that the District uses to assign SPED teachers to each building is unrealistic. They look at the numbers in the spring for the fall of the following year. We are always short staffed. The SPED staffing formula doesn't translate to enough staff to cover the hours on the IEPs."

[107] In prior years, the model four PAs and was changed to three PAs several years ago.
[108] Aside from the budget books, there was no other description of Evolve that GPS was able to provide to PCG.

[109] FY 22 Proposed Budget Book:
https://resources.finalsite.net/images/v1614877559/greenwich/drgosapyhopwlfbckflv/BoardBudgetBookFinalV2.pdf

- "The biggest downfall, across all programs, is that the special education teachers are all hanging on by a thread – pushing their limits when caseloads increase. If they had smaller caseloads or paraprofessionals in their rooms, they would be able to deliver higher-quality support."
- "We are at a point where staffing is necessary. We need to increase staffing. Staffing has remained the same, but the needs of students has risen exponentially."
- "Not only are there fewer adults in the Academic Lab, but there are more students now."
- "The special education population is growing in the number and increase in minutes, but the budget is decreasing over the years, causing larger teacher to student ratios."
- "We've got 6 or 7 kids that just finished their evals. If all 6 or 7 qualify, we most likely don't have the staff to support them since the budget is done in May. I wish that could be changed. It should be rolling instead of being locked in."
- "We constantly have students come into the school mid-year. If that student is a comprehensive student, they don't have the staffing to support them."
- "In the perfect world, if we could help format the schedule for our students to group and better support them, that would be great."
- "I firmly believe the academic lab teachers need to have their caseloads capped."
- "There's been an uptick in Academic Lab, without an increase in staffing. Staffing happens downtown - we're told what the number is and deal with it as you may."
- "Staff ratio is based on budget and not on student need. Staff have expressed concerns, students aren't getting their needs, special education teachers are cutting student hours and they were told to get parents to agree to the reduction in services."
- "Caseloads for sped teachers in certain schools are too large and other schools have less cases with the same amount of staff."
- "The struggle that comes to play is when we have quite a few students that are in the referral process at this at this point in time currently being evaluated and… I would say there's a very good chance that those referrals and evaluations do turn into students that will be receiving services and… typically the staffing numbers don't readjust and we really need to."

Process and Budget Oversight

- "In terms of staffing, that's out of our hands. Central office has staffing for special education. In terms of actually allocating staff that doesn't fall at the building level, it falls at the central level."
- "There have been times mid-year where we have had to go to bat and fight for an additional person or body because we are so short staffed that we can't cover services. It's happened every year that I've been here."
- "It's decided back in May how many special education teachers and paras we'll have--this has been ongoing. Parents are much savvier in the last ten years, and they're more likely to go through with evaluations. The number of kids going into special ed - it's a lot more than 10 years ago."
- "It's so difficult to advocate for your staffing needs. There needs to be more transparency and collaboration."
- "At my child's school, they would increase IEP minutes to get additional teachers in the building" [from a parent].

Impact on Instruction

- "I think the model is broken. There's no co-teaching here."
- "We could definitely use more staff, particularly the Academic Lab teachers… I would love academic lab teachers to sit with the team of teachers and talk in depth about how these kids are doing. How great it would be to have 20 minutes and talk in depth with those kids."
- "When we request another person, we usually don't get another person. The sped coordinator will work with us to identify alternatives to meet the needs. It ends up piecemealing for the student – with many different people supporting the student (some students don't mind – but comprehensive students (students with autism where transitions are tough) that doesn't work."
- "It's hard to be in compliance all of the time with all of the students with IEPs in addition to students without an IEP who need help (didn't used to be a problem but it is now)."
- "At our school we backed into our model. We looked at bodies and then backed into a model for services based on need. It's not driven by a direction that is creative or adaptive for the changing needs of the building."
- "Service hours indicated for students don't reflect their needs, and staffing isn't based on the service hours that are included for students."

Focus groups also shared the following about PA staffing:

- "For Academic Lab they do not have para support helping, throughout the years that has been taken away."
- "Previously there was more consistency in the paras supporting students. Para support is instrumental in success of students in class – especially for students who require consistent re-direction."
- "Hiring people who are qualified to work as paraprofessionals in an educational setting would make a huge difference but we just need bodies in rooms at this point so it feels like they are just hiring to hire."

Table 6. Special Education Allocations by Building[110] [111]

Level	School	Total Population	# of Students with IEPs	% of Students with IEPs	Special Educator FTE	Special Educator to Student Ratio	Instructl. Assistant FTE
Elementary School	Cos Cob School	360	36	10%	3.0	12:1	6.0
Elementary School	International School at Dundee	36	22	6%	2.5	8.8:1	2.0
Elementary School	Glenville School	398	37	9%	3.0	12.3:1	7.0
Elementary School	Hamilton Ave. School	314	47	15%	4.0	11.8:1	8.1
Elementary School	Julian Curtiss School	275	46	17%	4.0	11.5:1	6.0
Elementary School	New Lebanon School	261	46	18%	5.0	9.2:1	6.0
Elementary School	North Mianus School	489	43	9%	4.0	10.8:1	4.0
Elementary School	North Street School	325	20	6%	3.0	6.7:1	5.0
Elementary School	Old Greenwich School	351	23	7%	3.0	7.6:1	3.0

[110] GPS 2021-22 Proposed Budget Book:
https://resources.finalsite.net/images/v1614877559/greenwich/drgosapyhopwlfbckflv/BoardBudgetBookFinalV2.pdf
[111] Exclude preschool

Elementary School	Parkway School	225	34	15%	3.0	11.3:1	5.0
Elementary School	Riverside School	445	26	6%	2.0	13:1	4.0
Middle School	Central Middle School	578	69	12%	7.0	9.8:1	8.0
Middle School	Eastern Middle School	838	94	11%	14.0	6.7:1	9.0
Middle School	Western Middle School	628	92	15%	7.0	13.1:1	10.0
High School	Greenwich High School	2755	372	14%	22.0	16.9:1	20.0

Integrated Preschool

Under IDEA, GPS is required to provide special education services to young children, ages 3-5 years old, who have been identified as having one of the qualifying disabilities. One of the compliance indicators for the state is the percentage of these young children served in "regular early childhood placements." The preschool lottery serves to support inclusive instruction by providing peer models to those students identified with disabilities. The lottery is held to select children for typically developing peer slots. For the 2020-2021 school year, there were 161 applications with 33 students remaining on the waitlist. (Families pulled applications/withdrew due to Covid 19.) Typical peers pay tuition with an adjustment for students who are eligible for free/reduced lunch. All preschool positions are budgeted and charged to the preschool program within the PPS Office (instead of by school).

There are currently 13 preschool classes in four locations – seven classes are full-day and located in magnet schools (Hamilton Avenue and New Lebanon), and six are in other elementary schools (North Street and Old Greenwich) with a five-hour day model. One classroom is currently running remotely. Children who are typically developing and children with disabilities attend each preschool classes.

The FY 2020 budget was set with a 10:5 student (Peer: Student with Disability) ratio. The FY 2021 ratio was set with a 9:6 student ratio, and this will continue for FY 2022.

The following chart shows the preschool program growth since 2012-13.

Table 7. Students Recommended for Special Education Eligibility for Preschool Classroom Seats[112]

	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
Start of Year	28	38	45	44	38	39	48	53	59	55*
As of Jan. 1	33	44	47	56	49	51	67	62	80*	-
End of Year	48	52	57	66	63	70	81	85	88*[113]	-

Staffing Ratio Comparisons

Information used to compare GPS staff ratios to other school districts was provided through several surveys conducted by the Urban Special Education Leadership Collaborative, and was supplemented by data from reviews conducted independently, or with the Council of Great City Schools and PCG over the past five

[112] GPS 2021-22 Proposed Budget Book:
https://resources.finalsite.net/images/v1614877559/greenwich/drgosapyhopwlfbckflv/BoardBudgetBookFinalV2.pdf
[113] * Projected

years.[114] Data from 70 other school districts provide a general understanding of districts' staffing levels in the following areas: special educators, instructional assistants, speech language pathologists, psychologists, social workers, nurses, occupational therapists, and physical therapists. Additional details, GPS Staffing Ratios Compared to Other Districts, are provided in the Appendix. The data do not provide precise district comparisons, and the results need to be interpreted with caution. At times, district data are not uniform (e.g., including or excluding contractual personnel, varying methods for collecting and reporting student counts) and are impacted by varying levels of private and public placements, where personnel outside a district provide special education/related services to a group of district students. However, these data are the best available and are useful to better understand staffing ratios for school districts.

The ratios reported below are provided for special educators, professional assistants, psychologists, speech/language pathologists, social workers, nurses, and occupational therapists (OTs). The figures do not reflect actual caseload ratios for each of these personnel areas based on student IEPs. Rather, they are based on full time equivalent (FTE) staff members and not on the number of positions *per se*. The total FTE count for each area is compared to the total number of students with IEPs in the district.[115]

Special Education Teachers and Professional Assistants

Information about GPS' special education teacher and professional assistant ratios compared to other school districts is included below.

Table 8. Average Number of Students with IEPs for Each Special Educator and Professional Assistant[116]

Areas of Comparison	Special Educators	Professional Assistants
Number of GPS Staff FTE	125	142
GPS Student w/IEP-to-Staff Ratio	9.0:1	7.9:1
All District Average Ratios	14.5:1	15.4:1
GPS Ranking Among Districts	5th out of 71 reporting districts	9th out of 71 reporting districts

- **Special Educators.** GPS has an overall average of 9.0 students with IEPs for each special educator. This average is lower than the 14.5-student average of all districts in the survey. GPS has the fifth lowest ratio among the 71 reporting school districts.
- **Professional Assistants.** GPS has an overall average of 7.9 students with IEPs for each professional assistant. This average is lower than the 15.4-student average of all districts in the survey. GPS has the ninth lowest ratio among the 71 reporting school districts.

Student Services and Related Service Providers

Information about GPS's student services and related service providers compared to other school districts is included below.

Table 9. Average Number of Students with IEPs for Each Student Services and Related Service Provider[117]

Areas of Comparison	Psychologists	Speech/ Language Pathologists	Social Workers	Nurses	OTs

[114] Sue Gamm, Esq. compiled and continues to maintain this list. She grants PCG permission to use the data in reports.
[115] GPS staffing ratio calculations based on data provided by GPS to PCG.
[116] GPS's professional assistants are compared to paraeducator data nationally.
[117] GPS does not employ physical therapists; therefore, comparison data are not included.

Number of GPS Staff FTE	30	26	15	23	1
GPS Student w/IEP-to-Staff Ratio	37.5:1	43.2:1	79.4:1	48.9:1	1,124:1
All District Average Ratios	167.3:1	117.5:1	327.5:1	327.5:1	420.2:1
GPS Ranking Among Districts	2nd out of 71 reporting districts	2nd out of 71 reporting districts	10th out of 71 reporting districts	1st out of 71 reporting districts	65th out of 71 reporting districts

- **Psychologists**. There is one psychologist for an average of 37.5 students with IEPs compared to the surveyed district average of 167.3 students, ranking GPS as second of the 71 reporting districts.
- **Speech/Language Pathologists**. There is one speech/language pathologist (SLP) for an average of 43.2 students with IEPs compared to the surveyed district average of 117.5 students, ranking GPS as second of the 71 reporting districts.
- **Social Workers**. There is one social worker for an average of 79.4 students with IEPs compared to the surveyed district average of 327.5 students with IEPs, ranking GPS as 10th of the 71 reporting districts.
- **Nurses**. There is one nurse for an average of 48.9 students with IEPs compared to the surveyed district average of 327.5 students with IEPs, ranking GPS as first of the 71 reporting districts.
- **Occupational Therapists (OT)**. There is one OT for an average of 1,124 students, compared to the surveyed district average of 420.2 students, ranking GPS as 65th of the 71 reporting districts.

Summary and Implications

Having a strong operational infrastructure is critical to ensuring school districts can meet their vision of providing high-quality programming. This means that schools have appropriate central office support for problem solving, transportation processes are sound and busses run on time, resource allocations align to meet student need, and teachers are supported with professional learning for continuous improvement. If any of these are weak or missing from the way districts and schools lead, they are putting their entire commitment to their mission and vision at risk. As such, GPS will need to place an equal emphasis on shoring up certain operational supports as it does on instructional practices to help develop a thriving special education program.

Under the current structure, the PPS Office operates with a lean staff to meet its objectives. The organizational structure appears to be primarily supporting processes, procedures, and compliance district-wide, with programmatic initiatives and instructional support for differentiated instruction being initiated and implemented at the school level. Given this model, the PPS Office is not currently structured to provide instructional support or best practices to schools. Further, the culture of the department needs revamping, with a strong orientation toward collaboration with parents and school staff in the future. Further clarity is needed around the focus of the office. Changing the office name to Specialized Instruction and Services, for example, could help rebrand and set a new course. In addition, the new name would clarify its focus as embracing both special education and support services. Over the course of the next school year, GPS will have an interim Chief. This change provides GPS an opportunity to establish a strategic direction for the office and optimize its organizational structure to support strategic initiatives.

While other school districts have struggled with decreasing budgets over the years, GPS has benefitted from relatively consistent funding from the town and low staffing ratios – compared to other districts nationally based on available data - for special education teachers, instructional assistants, nurses, speech

therapists, and psychologists. However, the per student dollar amount for students with disabilities has decreased over the past several years, and the commitment of funds to out of district placements has continued to escalate. Nationally, there is no consensus on the ideal student to teacher ratio for supporting students with disabilities, primarily because staffing decisions should be made based on programmatic and instructional priorities and the supports required for providing students an appropriate education. Staffing should be a byproduct of a district's instructional model, not the driver of it. Dissolving the use of Evolve and committing to developing a new, transparent staffing model are steps in the right direction. GPS will first need to re-imagine how it provides instruction and support services for students with disabilities, centering them on providing meaningful access to grade-level curriculum, before developing a new allocation model. As part of this development, the District should engage in outreach to parents and PPT teams of students who are in out of district placements to better understand what was missing from GPS schools that they pursued this avenue.

Creating additional user-friendly procedural guides for staff and parents and delineating necessary transportation protocols will allow GPS to set expectations and establish standards of practice for how schools provide special education instruction and support services and what parents can expect. Providing professional learning opportunities for school staff on these revised procedures, as well as access to additional job-specific trainings and job-embedded coaching, will be critical.

V. PARENT ENGAGEMENT

Strengths	Opportunities for Improvement
• **Engaged parents**. PTA Council's Special Education Supports and Twice Exceptional (2E) Committees and the Greenwich Special Education Advisory Council (SEAC) are active partners in the GPS's special education initiatives and serve as strong advocates for students and their families. • **Communication outreach**. GPS is committed to providing accurate and timely information to the community via various means, including the Superintendent's Friday email. • **Competent, caring staff**. Parents feel that GPS staff are knowledgeable, generally work in the best interest of the child, and are responsive.	• **Communication.** Parents would like more routine communication from school staff about their children's progress or challenges they face. • **Pace of change.** Parents see limited change in the delivery of services to address their concerns over many years. • **Limited trust.** There is an undercurrent of mistrust that parents have of the PPS Office. • **Advocacy and equity**. Parents report having to strongly advocate for an evaluation and/or services they believe their child needs. Those who do so are believed to have greater access to services.

This chapter summarizes findings from GPS specific to perceptions of parent and community engagement.

Parents are a child's first teacher and are important partners as their children progress through school. Their vital role is acknowledged in IDEA, which requires parental input in writing IEP goals, the provision of related services, and placement. IDEA also requires collaboration with parents and students with disabilities, as appropriate, to design special education along with related and other supplementary services. As part of this review, the parent's role and satisfaction with special education processes and instructional/service delivery within GPS were evaluated. The review sought to examine three topics related to parent and family engagement:

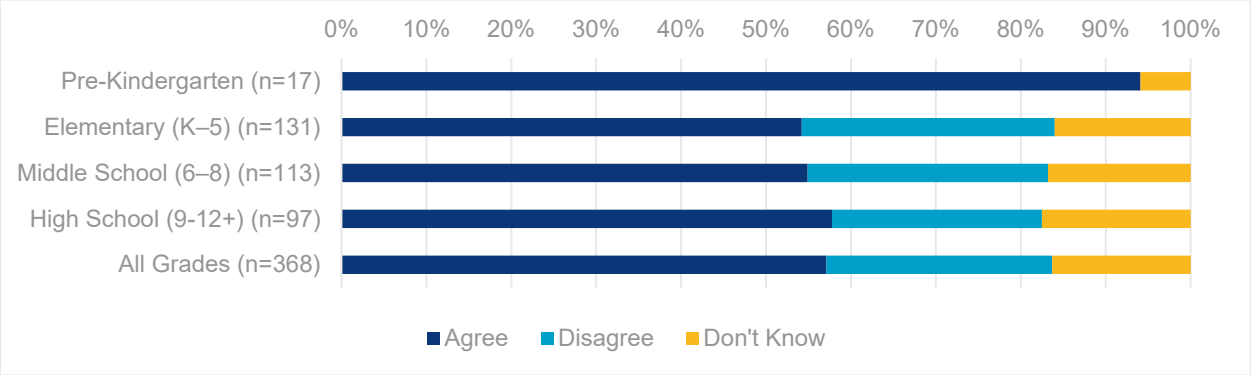
- **Information and communication:** The extent to which parents are provided with useful information and communication throughout the process, have the ability to find consistent and reliable information about each process, and the extent to which the resources (literature, documentation, etc.) support the process;
- **Parent voice, collaboration, and trust:** The extent to which stakeholders feel that their input is solicited, heard, and included; resources used to facilitate communication with parents of students with disabilities; and how parents are approached to collaborate with school staff in a trusting manner; and
- **Student support:** The extent to which parents believe the evaluation process and IEPs support their children, and that appropriate placements, instruction, services, interventions and accommodations are provided.

Information and Communication

As noted on their website, GPS is committed to providing accurate and timely information to the community. This occurs through several means, including updates to the District's website, GPS-TV, board meetings, and ParentLink, which provides electronic mass communication to parents. The District also produces the "GPS District Digest," an e-newsletter that shares news, updates, announcements, and other information to parents, students, community members, and all others who are interested in staying up-to-date on GPS. At the start of the pandemic in Spring 2020, the superintendent began a Friday email for parents and has continued this outreach consistently. Focus group participants noted their appreciation for the Friday email.

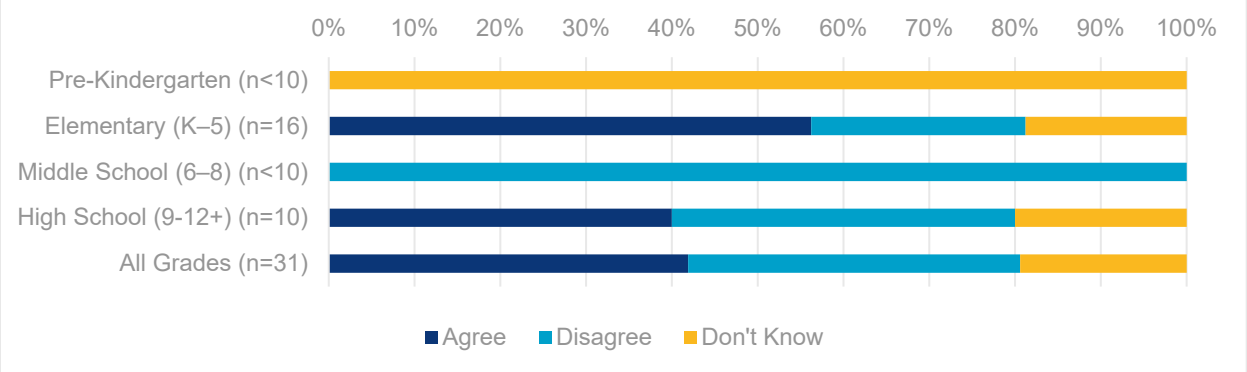
The parent survey asked questions about communication with GPS and their child's school.

Exhibit 79. Parent Survey: Central administration staff communicate effectively with me.



Overall, 57 percent of parents reported the central administration effectively communicates with them. Pre-K parents had a significantly higher rate of agreement (94 percent) compared to elementary (54 percent, middle (55 percent), and high school (58 percent) parents.

Exhibit 80. Parent Survey: There is sufficient communication between GPS and my child's current program/school.



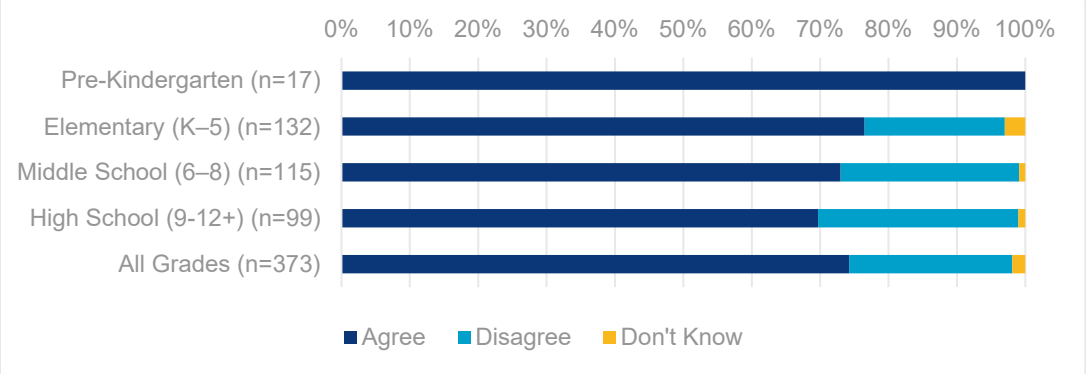
With regards to communication between GPS and their child's current program/school, only 42 percent of all parents agreed that it is sufficient. These percentages were higher at the elementary school level (56 percent) but lower in high school (40 percent).

Focus group participants shared that, in the past, District efforts to push information out to the special education parent community felt punitive. The tone and tenor of the communications were negative or overly focused on compliance. For the 2020-21 school year, the District developed a biweekly newsletter that contains positive information about the special education program in schools. Many felt that if GPS could

more effectively communicate good news, along with updates and other information, the District would be in a better position to work through issues with parents in a proactive way.

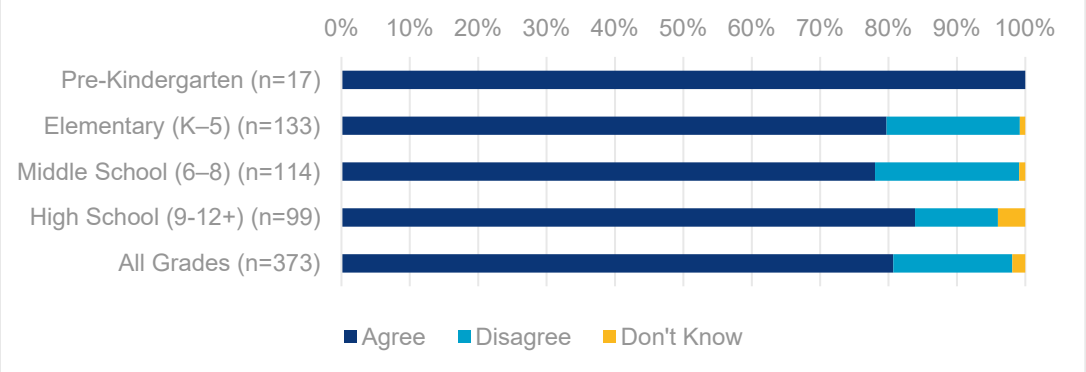
Communication with parents has traditionally been a challenge for GPS. Some staff mentioned that in studies done in the past, across various offices and areas, communication always received the lowest score.

Exhibit 81. Parent Survey: Teachers/school staff communicate effectively with me.



Across all grades, 74 percent of parents felt that school staff communicate effectively with them. There is a slight decline in this perception as students move up through the grades: while 100 percent of Pre-K parents were positive about communication with GPS, only 70 percent of high school parents shared this view.

Exhibit 82. Parent Survey: School staff respond to my concerns within a reasonable time period.



Parents were asked whether the staff in their child's schools are responsive. Overall, the majority of parents reported that administrators respond to them (81 percent). The highest level of agreement was among parents of high school students (84 percent) and the lowest was among parents of middle school students (78 percent).

Focus group participants described various ways that school personnel engage with parents of students with disabilities. Many parents said they receive at least weekly communication from their child's teachers. Some schools have created newsletters that are emailed to parents monthly, held coffees (in person pre-pandemic and virtually during the pandemic) and information sessions with parents, and held teachers accountable for routine communication with parents. One best practice shared was to have special educators reach out immediately to parents at the start of the school year to introduce themselves and set a positive tone for future communication. Another school has implemented an online newsletter (for the entire school, not just for parents of students with disabilities), and staff routinely monitor who opens the

newsletter and when they accessed it. The school then has a sense of which families are engaged, and which ones might not be, enabling school staff to reach out accordingly. Another school held a “speed dating like” event in the evening and provided childcare. During eight-minute rotations, parents met with their child’s related service personnel, psychologists, and teacher. One principal had a book club with guest speakers on specific topics, such as reading and literacy, supporting students with anxiety, growth mindset, handling stress, etc.

Other schools shared that parents reach out more to school staff than vice versa and identified this area as one of needed growth. Some believe it is generally more difficult to engage the parents of students with disabilities and that at times they have parents who do not show up to meetings or respond to any outreach. A parent from one focus group shared how more proactive communication would have been helpful for her. She had the opposite experience as a new parent to GPS, in that she did not receive return phone calls and did not sense a feeling of urgency from school staff to help get services set up for her child. There was little discussion among focus groups about specific outreach done to support parents who do not speak English.

Parents in focus groups were also asked whether they had attended GPS - sponsored trainings or received information about special education. There was significant variation in terms of understanding what is available. Some parents were not aware of parent resources outside of procedural safeguards. Others mentioned knowing about workshops either sponsored by their schools, by the PTA, or Greenwich SEAC.

Parent Voice, Collaboration, and Trust

GPS is fortunate to have a very active core of parents of students receiving special education services. These parents are not only engaged with the education of their individual student, but also dedicate significant time to participate in district-level processes and policies through two groups: the Greenwich SEAC and the Parent-Teacher Association (PTA) Council, specifically the Special Education Support (SES) and Twice Exceptional (2E) committees.

Greenwich Special Education Advisory Council (SEAC)

The purpose of the Greenwich SEAC is to build full, equal, and equitable partnerships between families, the school district, and community partners. The SEAC gives advisory opinions to the Board of Education on matters pertaining to the education and safety of students with disabilities.

General membership is open to any interested parent or guardian who is a Greenwich resident and has a child ages 3-21 with a disability, previously known to have a disability, or suspected of having a disability under the IDEA or Section 504. Voting members are selected at random and represent a broad range of perspectives. There are currently 22 members. Non-voting, contributing members include the superintendent, the chief Pupil Personnel Services officer, and two Board of Education members. The group was formed at the start of the 2019-20 school year.

The mission of the Greenwich SEAC is:

1. To provide education and information to parents/guardians and the broader community on special education issues and services.
2. To establish better understanding of, respect for, and support of special education in Greenwich.
3. To advise GPS on matters that pertain to the education and safety of students with disabilities and 504s to ensure that every student receives a FAPE and students' needs are being met.

4. To report annually (or more often if needed) to the Greenwich Board of Education on matters related to the education of students with disabilities.[118]

Greenwich SEAC meets at least five times per year. All meetings are announced to Greenwich SEAC members, and notice is given to the entire community. Each meeting includes a variety of topics, ranging from updates from GPS administration to parent training and workshop opportunities. Providing additional training and resources for parents has been central to SEAC's mission and activities.

PTA Council's Special Education Support (SES) Committee

The PTA Council has 14 committees: Academic Excellence, Advanced Learning Program, Afters, Curriculum Enrichment, Digital Learning Environment, Directory, Early Childhood Education, Essence Award, Green Schools, Health & Wellness, Scholarship, Special Education Support (SES), Special Programs, and Twice Exceptional (2E).[119] Both the SES and 2E committees focus on the needs of students with disabilities and their families. As described on GPS's website: [120]

- The Special Education Support (SES) committee advocates for the needs of students who have a disability/difference whether learning, physical, or comprehensive. The committee helps families become better acquainted with educational options for their children and provides a network of support for parents/guardians. The committee shares information and resources about the special education process and services available in the GPS system to help each child realize her/his fullest potential.
- Twice Exceptional Learners (2E) advocates for the needs of students who are both advanced or "gifted" and have a disability/difference. The Committee helps families become better acquainted with educational options and provides a network of support for parents/guardians. The Committee also shares information and resources to help each child realize her/his fullest potential.

For 2019-20, one area of focus for the PTA Council was on advocating for special education supports. One of the key efforts of the SES was to "promote the institution of a SEAC-Special Education Advisory Council by the District to 'build full, equal and equitable partnerships between families, the school district and community partners' to provide advisory opinions to the Board of Education."[121] The SES committee also focused on two goals: 1) strengthening the communication and relationship between parents, teachers, and administrators, and 2) on increasing the awareness of the SES Committee to support parents, increase committee membership and parental participation. Committee members:

- Met with PPS administrators and all SES building representatives to share parent perspectives, gain clarification, and strategize ways to strengthen communication and relationships.
- Hosted open meetings to answer all questions from parents and provide updates in programs and staffing.
- Met regularly with each school's assistant principal to open the same lines of communication on a school-based level.
- Joined PPS administrators and faculty for a series of discussions on exploring an autism program in GPS.

[118] Greenwich SEAC bylaws: https://resources.finalsite.net/images/v1621264012/greenwich/i0yasr661jap6dbr6zl0/GPSSEACBylawsFinal_1.pdf
[119] The PTA Council also has fifteen school units, each representing a GPS school.
[120] https://www.greenwichschools.org/community-ptac/ptac/what-we-do
[121] Greenwich PTA Council Annual Report, 2019-20, https://resources.finalsite.net/images/v1592484021/greenwich/kerxiww7ylkxtdlxrvpz/2019-2020AnnualReportfinalversion.pdf

- Participated on the Key2Ed Devising Seminar Task Force to gain feedback from families and community stakeholders on strengths and concerns in the special education program.
- Attended meetings with GPS special education administration.
- Gathered parents for coffees and other school-based events to get the word out about the committee, as well as serve as a place for parents to come together for support and resources.

Accomplishments of the 2E Committee included:

- Hosting two 2E parent roundtables.
- Hosting one 2E representative meeting to discuss the best way for school representatives to work with parents of 2E students.
- Working with the school representatives on the best way to educate the GPS community on the characteristics of a 2E child.
- Emailing the 2E parent email list information that would be relevant and interesting.
- Updating a list of “parent recommended” resources from the 2E Parent Roundtables to use a source for parents.
- Updating the Operation and Transition manuals for future 2E chairs.

For 2020-21, all of the actions of the PTA Council were viewed through the lens of improved learning. One identified effort in particular was supporting this Special Education Review.

Collaboration and Trust

While parents have multiple venues to share their concerns about special education in GPS including school board testimony and public comment at Greenwich SEAC meetings, many parents noted that changes within GPS have been slow to materialize and that issues with consistent special education instruction and services have persisted despite many years of advocacy. By past filing of complaints to the Connecticut Department of Education, parents have attempted to leverage state level oversight to generate changes within GPS.

Central to the parental need to file complaints and advocate at Board of Education meetings is the distrust that parents have for the District, specifically the PPS Office. Focus group participants shared that Greenwich is known as a “litigious community” and that the lack of trust between parents and administrators is longstanding and deep. Parents often feel they must fight for “everything” and do not want to speak up because of fear of retaliation. It is not unusual for a parent of a three-year-old child to come to a PPT meeting with an advocate or attorney. Many district staff acknowledge that they have seen an increase in the number of parents bringing advocates to PPT meetings. Some feel frustrated and upset that despite their best efforts with positive communication they end up in due process with parents. Other focus group participants shared that they think the special education system is built around those who can afford a lawyer to get services and that those without funds are left behind. Parents are wary of school staff and the PPT process because they have felt “ambushed” or “manipulated” by teachers calling them to set the stage for the next meeting for why the goals and objectives were going to be adjusted. One parent participant indicated he would like the “lies to stop.” Another shared her recent experience: “There has been a little more coordination and less friction, more about working together. I do appreciate them working with me now, but the hostility getting to a place of coordination was very, very difficult. I had a lot of roadblocks.” Last year, the District used the Devising Seminar, facilitated by Key2Ed, to engage stakeholders and have them work together to identify solutions to selected problems and to create a workable action plan designed to reduce disputes. Some cited this as a start to the process but it did not go far enough to change the deeply rooted mistrust between parents and school staff.

Equally, focus group participants shared that staff feel uneasy about parent partnerships and voiced the need to build stronger, more pro-active, productive relationships. They said that school staff are also concerned about retaliation and feel an "us vs. them" mentality. Many expressed that there has been an emphasis on compliance over people. Working through this lens can make it feel like a stone wall up has been erected and that the PPS Office is not working with parents. School staff shared they are conscious about what they say because they worry that they are being recorded (especially with remote learning and being "in" students' homes). Participants also voiced that they believe there are many families who appreciate special educators and the services their children are receiving and that a small, vocal group of parents are speaking on behalf of the community to the local media and at Board of Education meetings. Though Board of Education meetings allow for public comments from all, focus group participants believe that school staff are not able to speak openly about situations in their schools in response to parent concerns. They also largely remain silent out of respect for individual students. As such, the narrative is being told for them, leaving school staff to feel disparaged.

Student Support

Focus groups shared valuable feedback on a variety of topics regarding their experiences as parents of students with disabilities. This section provides a summary of this feedback specific to special education programs.

Intervention and Evaluations

There were several concerns raised in parent focus groups about the lack of interventions provided in the general education setting and the time it took to begin the evaluation process for students suspected of having a disability. These included:

- Parents perceive they are "on their own" to work through the evaluation process and that they must pay for independent testing to move it forward.
- Trust is eroded because the process for eligibility seems long and confusing.
- Early intervention has not been prioritized. (If schools intervene earlier, there is a chance that students may not need as intensive supports later.)
- Parents need more consistent communication from the District, at a level that everyone can understand, about what to expect in RTI and special education. Without this information, parents are not trusting that school staff are doing enough to help their child.
- A belief that the District wants to have the smallest number of students evaluated as possible and is, therefore, delaying evaluations.

One parent also described the confusion he felt after he took his son for a medical evaluation, only to learn that a medical diagnosis is not the same as an educational one. He hired an advocate at that point to help him navigate what supports are necessary in the school setting.

Service Delivery

Parent focus group participants also shared concerns about the delivery of special education supports and services. These included:

- Families feel that the skillset of staff is limited for supporting students with disabilities, leaving them to consider private placements more readily.
- Schools are ill equipped to handle students with significant sensory issues.
- A perception exists that the bar for execution is low and that IEP goals are not ambitious.

- There is a belief that the quality of services is lacking, in particular for students who need a smaller, self-contained setting but do not have behavioral issues.

One parent shared of her daughter: "The money that I'm spending on advocates and lawyers I'd rather spend on the additional learning and services for her. I just don't think anyone's interests are aligned. Why can't her school have more options for her?"

Parent Comments on Survey

Parents also had the opportunity to share points of pride and areas for improvement in an open-ended question on the survey. The following themes emerged from the survey responses and are similar to the topics (listed above) identified in focus groups:[122]

Points of Pride

1. Caring, helpful, supportive, and attentive staff (55 percent of respondents)
   - "I felt that my concerns and knowledge regarding my child's strength and weaknesses were heard."
   - "They help you in every step of the way with your child's needs."
   - "The staff is approachable and always willing to help as needed! They also provide individual encouragement!"
   - "I believe staff and teachers did their very best to engage, evaluate and support my son to the fullest extent possible."
   - "I was very impressed with the team of top botch professionals reviewing and assisting on his case."
   - "Teachers have been very relatable and kept a good relationship with my child."
2. Responsiveness, including communication with parents and timely meetings (36 percent of respondents)
   - "I found the process to be very collaborative."
   - "The communication has been very solid. I do feel like I hear from her teachers often. They give good feedback and suggestions."
   - "Great communication with everything that is going on."
   - "The team is great, really responsive."
   - "I have access to the staff whenever I have any concerns. During our meetings, the team does a great job communicating. They are clear and precise."
3. Individualized supports are provided (33 percent of respondents)
   - "Using the correct tools (tech, etc.) so the students can manage a text or research information."
   - "They understand my son and give him the proper support."
   - "I believe out of classroom support is effective based on what I viewed during the 2 weeks of remote learning when in quarantine."
   - "IEP is being followed."
   - "Our school is very good at accommodating each child's individual needs."
   - "I think it really helps addressing the extra time my child needs to learn. It boosted his confidence."

[122] Responses will not equal 100% as respondents, in most cases, identified more than one point of pride and area of improvement each.

- "The resource room has been a tremendous advantage. The instruction, support and guidance that he receives there has been a huge help, academically and emotionally."

4. High expectations and respect for students as individuals (14 percent of respondents)
    - "I believe the special education staff have the best intentions for their students. They work hard to build relationships with them and figure out the type of learner they are."
    - "The teachers understand my child's needs and tries different strategies to help them succeed."
    - "My son is treated with respect and a valued team member of his own learning."
    - "Service providers have been great with our daughter. They have taken the time to get to know her strengths and weaknesses. They have built a good foundational relationship and she trusts them."
    - "Knowledgeable and knowing what every child needs. Their enthusiasm and dedication on their profession. They naturally love kids.
5. Knowledgeable, competent staff (9 percent of respondents)
    - "The special education staff at my school are phenomenal. They are dedicated, caring and knowledgeable and genuinely care for my child and want him to succeed."
    - "The teacher and staff are very well trained and are supportive."
    - "Knowledgeable in terms of current special ed and psychological theory."
    - "The staff is qualified to implement the IEP Progress."
    - "Understands this population of students and works to make sure that the students are happy and learning."
6. Overall program satisfaction (8 percent of respondents)
    - "As a family we have been completely satisfied with our service here for our children."
    - "Our family is satisfied with all support and all services provided."
    - "The services offered were amazing, especially in elementary school for learning disabilities."
7. Progress on and rigor of IEP goals (4 percent of respondents)
    - "I'm always being updated about his progress."
    - "Progress reports are delivered in a timely manner."
    - "They are consistent with keeping the parents updated on the progress."
8. Identifying needs in a timely manner (4 percent of respondents)
    - "The services we have received for RTI have been excellent."
    - "The testing was very thorough. The specialists and the special education teachers are very helpful to my child and obviously committed to helping my child learn."
    - "I can only speak for my own child, but I feel like a plan was developed for him in a timely manner and the necessary steps put in place to carry out helping him be a better student."

Areas of Improvement

1. Collaboration and communication between staff and parents (29 percent of respondents)
    - "As his parent, I have always been the one who reaches out to the school when my son's academic performance drops. I feel like no one is watching out for him."
    - "I would love to have more regular contact- maybe weekly or monthly updates (could be billet points) on what is working well and what adjustments are needed)."

- “I really don't have good visibility to what the special education teacher is teaching my child on a daily basis (when he attends academic lab).”
- “A more frequent touch base/progress mini report since we do not have face to face time w/ teachers.”

2. Service delivery gaps or insufficiencies (26 percent of respondents)
    - “The special education teachers don't know how to modify the general education curriculum and my son's time in general education was a total waste.”
    - “Often feels like glorified babysitting. No learning.”
    - “Unfortunately, related service providers are often pulled for behaviors outside of the classroom or have to cancel her service times because of other more "important" situations. We know that this is NOT their fault.”
    - “If a SPED teacher is needed to attend a meeting there is no substitute and my daughter misses her services and usually there is no attempt to make up the time.”
    - “I have been disappointed with the accommodations of the classroom teachers. They are not taking into account how my child learns best. In fact, this year, they keep doing what makes my child turn off rather than embrace the learning.”
3. Need for additional staff and resources (16 percent of respondents)
    - “We feel that they IEP service hours are written for what they can deliver given their manpower, so less than what the child needs.”
    - “Professionals have made comments about being short staffed so they cannot provide services as dictated on the IEP.”
    - “I think that they aren't enough teachers for all the students that are receiving services. The number of kids receiving services is on the rise yet staffing remains the stagnant.”
    - “I think there should be more SPED teachers available. There are times that kids are left without an aid when needed due to lack of staffing and that disrupts the rest of that child's class.”
4. More training for staff (11 percent of respondents)
    - “General ed teachers need to be trained on the legal rights of a child in special education.”
    - “Teachers do not have any literacy or sped training and make assumptions of the potential of the students. Sped kids are never pushed to reach their true potential.”
    - “All staff need more training in motivating students and handling their behaviors.”
5. Limited transparency, concerns about trust, and fear of retribution (11 percent of respondents)
    - “Administrators can't always be trusted to follow the law.”
    - “I believe my specific school really excels by making children who struggle feel incompetent academically and socially. They are also skilled in the art of gaslighting and lying to parents, advocates and legal counsel. Bravo!”
    - “They do nothing good, except when you ran into a professional that cares and goes above and beyond. But when they do, they get into trouble with the administration.”
    - “Stop the decades long culture of fear, harassment and making children struggle.”
    - “Due to FEAR the staff holds back on what should be delivered.”
    - “I believe that the staff is held back from recommending services due to guidance from the central administration.”
6. Progress on IEP goals and low expectations (11 percent of respondents)

- “They do not write goals well or measure them well.”
- “The standards they set for my child were very low.”
- “In our case there was obviously inadequate measures of growth as progress was documented as mastered and satisfactory when in reality that wasn't the case.”
- “If you compare my child's IEPs over time, they do not make sense. My child's abilities appear inflated. There are items that she/he allegedly "mastered" which is clearly inaccurate.”
- “I don't know how effective the services are in ensuring progress.”

7. RTI not implemented or evaluations delayed (10 percent of respondents)
    - “I believe we wait too long to start services for these children. In order for them to get evaluated, they have to be failing and that is failing them!”
    - “Listen to parents. I want my child tested and am pretty much being refused.”
    - “The school should be responsive to the needs of students and follow the law in regards to FAPE and ChildFind. It would be way less expensive in the long run, and not make the relationship adversarial in nature.”
    - “Empower teachers to speak up about the child's needs. Listen to outside evaluators about student needs.”
8. Advocacy and litigation (10 percent of respondents)
    - “It should not be a fight to get the support you need. In every meeting it feels like they want to take more support away and try to discredit the child's needs. It's always a fight.”
    - “Parents cannot be expected to expend thousands of dollars each year and endless hours and stress to ensure that their children's IEPs accurately reflect what was agreed and then more to ensure implementation while dancing around fears of retaliation for doing so.”
    - “It should never need to take 3.5 years and costs/arguments from the parents to fight for the right placement of their child.”
9. Special education needs a complete overhaul (4 percent of respondents)
    - “Absolutely nothing done well. It is horrendous what they put our son and our family through.”
    - “So frustrated I can't think of anything good. I am sure there are great things, but it's been so long...”
    - “Right now I cannot say there is anything being done well at all. It is very, very concerning and worrying.”
10. Support for twice exceptional learners (4 percent of respondents)
    - “There seems to be a belief that if your child is in advanced classes, that everything must be "fine" and the child doesn't need any help because they are already smart.”
    - “I am not sure the ALP screening accommodates the needs of very bright kids with high testing anxiety or not used to the testing process.”
11. Support for students with dyslexia (4 percent of respondents)
    - “I was very unhappy with how long it took for my child to be evaluated for dyslexia. And once she was evaluated and given an IEP, I don't think she got enough specific reading instruction.”
    - “I think if the kids that specifically have dyslexia they all should have the same instruction and should be taught by someone who is trained in Orton Gillingham.”
    - “My child has dyslexia. The school didn't do absolutely nothing.”

Summary and Implications

Under the current Superintendent's leadership, outreach, and communication from GPS to support families of children with disabilities has continued to develop. Parents acknowledge improvement in GPS's efforts to keep them informed. GPS's parent organizations, Greenwich SEAC and the PTA Council's SES and 2E committees, are engaged partners and want to be part of the solution. They provide families with information, resources, and an outlet to share their voice in GPS. Training and information sessions they conduct, as well as ones that GPS has offered in the past, are perceived of as helpful but parent awareness of these opportunities is uneven, especially when they are driven at the school level.

GPS will need to develop a comprehensive plan focused on family engagement for parents of children receiving special education. This starts with setting a new, welcoming tone in the PPS Office and developing more forums for idea sharing, problem solving and support, improving responsiveness to concerns, and increasing training and materials available to parents. Quicky enacting the recommendations in this report will demonstrate that the District is committed to the improvements parents have long sought.

VI. PEER DISTRICT FINDINGS

With input from the GPS Steering Committee, PCG selected eight peer districts to interview. Districts were selected based on size, location, and demographics. Six of the eight districts responded to the request for an interview. Responsive districts were in the northeastern part of the United States, spanning the following states: Massachusetts, Maryland, New York, and Pennsylvania. District staff participated in these interviews on the condition of anonymity. As such, districts will be referenced in this section by letter designations (A-F). Key takeaways from this section for GPS are embedded in the Conclusion section of this report.

Peer District Data[123]

	A	B	C	D	E	F
District Size	12,765	2,039	3,625	7,069	3,159	15,256
% Students with Disabilities	16.9%	17.6%	10%	16%	11%	15.8%
% English Learners	6.0%	3.2%	1%	16%	5%	5%
% Economically Disadvantaged	33.2%	5.4%	5%	57%	12%	45.2%
# of School Buildings	17	5	6	9	5	29
Least Restrictive Environment						
In General Education ≤80% Classroom	87.5%	78.8%	88.1%	52.5%	65.8%	90.8%
In General Education Classroom ≤40%	2.6%	0.3%	3.3%	13.7%	8.5%	2.82%
Separate Schools and/or Other Settings	4.8%	8.3%	5.5%	7.6%	13.4%	2.70%

Role of Interviewees

In four of the six districts, interviewed staff currently oversee special education services and supports. Titles ranged from Director of Special Education to Assistant Superintendent of Pupil Services to Director of Student Services. One participant had recently left her district position as the Assistant Superintendent and former Director of Special Education. Another participant was a superintendent.

Continuum of Services and Staffing

Each district constructs their programs to provide a continuum of services to students in grades K-12. As such, the information presented in this section is organized by district profile so the reader can understand the holistic approach each district has taken. These profiles focus on the configuration of instructional services and do not address the provision of related services, though they, too, are a part of special education services and supports in every district profiled here.

District A

Several years ago, District A embarked on a new approach to inclusive practices and shifted how students with IEPs both accessed the general education classroom and received specialized support. One of the main reasons for this was that students with significant behavior needs were appearing more frequently in schools, and teacher schedules did not have enough flexibility to address these student needs. Schedules had to be changed several times mid-year, prompting schools to request out-of-district placements or

[123] Pennsylvania (https://futurereadypa.org); Massachusetts (https://reportcards.doe.mass.edu); New York (https://data.nysed.gov/lists.php?start=65&type=district); Maryland (http://www.marylandpublicschools.org/about/Documents/DCAA/SSP/20162017Student/2016SPED.pdf; https://data.imap.maryland.gov/datasets/f49c4bb1a9a74029ae974e6d6fd08b71_5)

paraeducator support for these students. These were not sustainable solutions. As such, the district then created a steering committee/task force to create an inclusive practices plan.

The first year was focused on school-based staff training. Teachers participated in a significant amount of training on the different models of collaborative teaching. Otherwise, the efforts would have "fallen flat." Not a lot of the training was done upfront. There were some initial sessions, but the majority of it came through job-embedded coaching. The District also added at least one inclusion facilitator at every school (some secondary schools have more than one). These staff are focused on problem solving and troubleshooting with teachers. These positions are critical to helping teachers figure out how to serve students with IEPs within the general education classroom and not in rely on sending them to self-contained classes. Occasionally inclusion facilitators served as case managers for specific students in the building. These positions were conversions of positions previously dedicated to self-contained classes. The District took a "pull all of the strings at once" approach and dismantled self-contained classrooms so they could redirect these staff positions to inclusion facilitators. Additionally, the District invested in five new positions to provide the full school complement. District A does still have some self-contained classes; however, they are targeted to specific programming rather than grouping students by disability. They are still working on how to shift the remaining classes to function as a service rather than a placement.

In addition to training and the creation of the inclusion facilitator role, the District also adopted other practices to support this roll out. They developed a Google Form to collect data on what principals were seeing in terms of collaborative teaching models and how effective those models were. This was not evaluative in nature; rather, it allowed school principals to keep track of what they were seeing in their schools to ascertain what was working well and what was not. The District also developed a written guide with clear expectations for teachers and schools and created a teacher exchange program so teachers could visit other schools to see best practices in action. There were guided notes, as well, so teachers could understand what to look for and expect to see on these visits.

Two issues emerged as the District launched this work. One was around scheduling and planning time. As one interview participant shared: "There is no co-teaching without co-planning." Each school had to redesign its schedule so that collaborative planning time for teaching pairs could be carved out, and the District established norms for how this time was to be used. The second challenge that emerged was around mindset. Not every principal was on board with inclusive practices at first. The administrative team spent significant time discussing how inclusion and access are civil rights, looking at disproportionality data, and challenging mindsets and assumptions about students. While the majority of teachers embraced these shifts, there remained an undercurrent of teachers and union representatives who were vocal in their opposition behind the scenes. The District has remained committed to this approach, though, and has started to interview teacher and principal candidates for their mindset and inclusive orientation.

District B[124]

Over the course of the past few years, District B has focused on building strong special education programs to support their continuum of services. This has meant redesigning their collaborative teaching model at the elementary, middle school, and high school levels to better support students with mild to moderate disabilities in accessing the general education curriculum and grade-level standards. The District previously used a pull-out model only, which resulted in fractured days for students and resulted in a high number of due process requests from families for out-of-district placements. Collaborative teaching and co-teaching were limited at the time. At the elementary school level, the District now provides reading, writing, math, and executive functioning through "push-in" (special education teacher provides support in the general education classroom) and "pull-out" (special education teachers provide support to students in a self-contained, small group environment called a learning center) support. In middle school, special education teachers are generally assigned by content area and/or by grade so they can pair with general education

[124] District B provided an overview summary of these programs to PCG.

teachers to co-teach to the extent possible. The middle schools also offer learning centers for students who require specialized small group instruction. Assignments and class configurations change year to year. The high school follows a similar model; however, an academic strategy class is also available through the learning center.

The District also developed the following specialized programs:

Language Based Classrooms (LBC) Elementary (Grades 2-5)

These classrooms are designed to provide direct, explicit instruction and specialized support in all subject areas to students with language-based learning disabilities. In addition to classroom instruction, students receive specialized, small group intervention based on individual needs. Providing students with opportunities for academic, social, and emotional success within a fully inclusive classroom are essential components of this program. The development of a positive attitude and the enhancement of self-confidence are goals for each student, in addition to strengthening their reading, spelling, and written expression skills.

Students in the LBC program are those identified with a language-based learning disability and who require specialized instruction, accommodations, and support throughout the school day in order to successfully participate in all subject areas. These students demonstrate significant weaknesses in receptive and/or expressive language skills; phonemic awareness and phonics skills; reading; spelling; and/or written expression and production. In addition to classroom instruction and support, students receive intensive, specially designed, multisensory intervention to address phonic-decoding and encoding skills, oral reading fluency, vocabulary, and comprehension. Depending on individual needs, they may also receive intervention for reading comprehension, writing, and/or math.

Research-based, specialized, multisensory methodologies are used to teach students to decode and comprehend language. Goals of instruction for students in the LBC are to strengthen and increase automaticity and fluency of reading and spelling skills, expand vocabulary knowledge, and enhance reading comprehension.

Each LBC is led by a master's level general education teacher and a special education teacher. These classes are co-taught, and the teachers have gone through co-teaching training together. All of the special education teachers, and some of the general education teachers, have been trained in the Orton-Gillingham Approach. The goal is to have no more than eight students with IEPs in each class of approximately 25 to 27 students. This class is offered in two elementary schools.

Language Based Classrooms (LBC) Middle School (Grades 6-8)

The middle school LBC has a similar model to the elementary school classes. Students may receive instruction in a fully inclusive general education class or in a smaller group setting, depending on the student's profile.

Language Based Classrooms (LBC) High School (Grades 9-12)

The high school LBC has a focus similar to the elementary and middle school programs and is specifically for students in grades 9-12. Depending on individual needs, students may receive intervention for reading comprehension, writing, and/or math. Students may also receive adult support in social studies and science classes. Academic strategies classes support the content areas as well as provide instruction in executive functioning skills and strategies. Students are also supported in transition planning for post-secondary goals. The LBC is led by a special education teacher. Students receive support within and outside of their classes to ensure application of learned strategies.

ACCESS Program (Grades K-12)

ACCESS is a highly individualized program that serves students with complex academic, social, and behavioral needs. While this program was initially designed to serve students with autism, it has evolved to meet the needs of students with a broader range of profiles. Students are fully included in general education classes and may also receive small group instruction with a special educator outside of the classroom. The common goal for students in the ACCESS program is for them to participate fully in the school community. Staff provide a range of academic and behavioral supports to help students participate in the general education curriculum and in the classroom and school community.

Students in the ACCESS program have complex learning profiles that necessitate an intensive level of support. Many have academic needs that require instructional accommodations and modifications. Some students also have behavioral challenges. Plans are developed to help staff provide consistent support and reinforcement and facilitate the student's participation in all aspects of school. ACCESS classrooms are led by a special education teacher and learning assistants.

Bridge Program (Grades 9-12)

The Bridge Program is a therapeutic, highly specialized program that supports students with significant social and emotional needs who require a small, highly supportive program in order to access the curriculum and participate in the school community. A common goal of the Bridge program is to provide students with support to establish positive relationships so that they can develop the confidence and skills necessary to take academic and social risks, and to increase their independence. Students in Bridge benefit from small group academic support, access to clinical support services, and organizational and study skills instruction. Bridge is staffed by a special education teacher, counselor, learning assistant(s), and clinical intern(s). Students in Bridge have ongoing access to emotional and academic support throughout their day; wrap around support among school, home, and outside providers; ongoing case management between the Bridge staff and the student's general education teachers; and transition support for both in school and postsecondary planning.

G.O.A.L. Program (Grade 12 through Post-Graduate/Age 22)

The Getting Organized for Academics and Life (G.O.A.L.) program is for high school students who are performing significantly below grade level. Students in the G.O.A.L. program often have intellectual and/or other disabilities that require all major content area instruction in a small group setting, separate from the regular education environment. The students need both a life skills component and a focus on functional academics.

Students in the G.O.A.L. program require specialized instruction for academics, life skills, and independent living. This includes all aspects of transition planning (community, education, and employment). In addition to academic curriculum, students learn vocational and community skills in a small instructional setting. This program is available as needed, based on student needs and population. G.O.A.L is staffed by a special education teacher and learning assistants.

COMPASS Program (Grades 6-12)

The COMPASS program is a general education program designed to support students with their reentry to school after an extended absence or hospitalization. Supported by a counselor, COMPASS works with students, their teachers, parents, and outside service providers to form individualized program goals, identify progress markers, and ensure a collaborative approach to support services. While each student's time in COMPASS varies depending on several factors, students typically spend 6 to 8 weeks affiliated with the program. Students in COMPASS have access to emotional and academic support throughout their day; wrap around support among school, home, and outside providers; and ongoing case management between COMPASS staff and the student's general education teachers. The program is staffed by a counselor, learning assistant(s), and clinical intern(s).

District C[125]

District C, like GPS, believes in having inclusive schools and described their elementary and middle schools as being "fully inclusive." Though there is a learning center (resource room) to support students who need a smaller environment or targeted instruction, most students are in general education classes for the majority of the school day. The entire day of a student with an IEP is built around the context of being in the general education classroom with their peers. To achieve this, the District places more adult resources in general education classes to support students. This is done in several ways. In some cases, paraeducators provide personal assistance, sometimes for the full day, to students in all of their classes. District C also has consultant special education teachers who push into the general education classroom and lead small groups there. At the elementary level, there is one special education teacher assigned to support each grade. Ideally, District C would like to move from having a consultant model to having enough special education teachers to pair with general education teachers for co-teaching to occur all day. At times, students are pulled out for targeted instruction as well. There are more dedicated co-teaching pairs at the middle school, given the rigors of the classroom and the scheduling blocks. This is a high-cost, personnel-intensive model; yet the District believes that students with disabilities are higher performing because of it.

The only students with an IEP in a separate program are those in the Pathways program at the high school. These students take the alternate statewide assessment. There are some students in grades 3 through 8 who also take the alternate assessment, but they, too, are included to the maximum extent possible in general education classes. The District is considering developing a Pathway-type program at the middle school level as well.

The following is a description of each of the special education program options in more detail:

Consultant Teacher Services allow students with disabilities to participate in a full-time general education program and receive services from a special education teacher for a designated period on identified days. Consultant Teacher Service may be direct, indirect, or a combination of both. Direct Consultant Teacher Services involves specially designed instruction (individualized or group) provided by a special education teacher to students with disabilities in general education classes.

Integrated Co-teaching refers to the provision of specially designed instruction and academic instruction in a general education class to a mixed group of students with disabilities and nondisabled peers by a special education teacher and a general education teacher. The vision for integrated co-teaching services is for a general education teacher and a special education teacher to jointly provide instruction to a class to meet the diverse learning needs of all students in the class. The maximum number of students with disabilities receiving integrated co-teaching services shall not exceed 12 students.

The **Intensive Services Model** is available to students throughout the school district in grades K through 2 who have significant developmental disabilities and require highly specialized instruction and therapies outside the general education classroom for some portion of each day. Each day, intensive instruction and related services are provided for: early language development and communication; social relationships with other children and play; adaptive behavior in areas such as self-care, dressing and feeding; cognitive development; behavioral regulation; and physical development.

Resource Room Services are supplemental in nature and are designed to remediate academic skill deficits and to develop the study skills and organizational skills needed to effectively manage the general education curriculum. The goal of the resource room program is to promote independence and self-advocacy skills.

The Transitional Support Program (TSP) is a flexible program providing regularly scheduled academic and therapeutic support to students with and without disabilities who are experiencing different levels of

[125] District C provided an overview summary of these programs to PCG.

emotional distress. Educational supports include: direct instruction of coursework, study skills, organizational help, and assistance related to learning difficulties. Therapeutic supports include: individual, small group, and family counseling. Intensive case management services for students are available and include: teacher consultation, in-class interventions, monitoring of student attendance, academic updates to students and families, individualized daily plans, consultation with private therapists, psychiatric consultation, and family meetings. Families become a component of the support plan designed for each student. The program's flexibility responds to a student's need, and can range from multiple contacts daily, to course instruction for one or more classes, to a student initiated "check-in."

The **Pathways Program** is an inclusive educational program for students whose unique needs require more than just supported participation in the general education curriculum and program. The Pathways Program provides students specialized opportunities to engage in individually designed programs in their own community school.

District D

District D offers a broad continuum of services in order to meet student's needs in the least restrictive environment. There are a variety of inclusive and self-contained options so that a student's program can be tailored based on their individual needs. Students remain in their neighborhood schools to the extent possible. However, not all services are available in all buildings. Developing an integrated co-teaching model has been a District priority over the past several years. Over time, the District has been closing its self-contained classes and moving staff to a co-teaching approach. Co-planning time has been a barrier, especially at the secondary level; however, teachers are using technology tools like Google and Office 365 to bridge this gap. The District philosophy is built on social justice and high expectations, as the District believes that students with disabilities deserve to be in general education classes accessing grade-level content to the maximum extent possible. Also, the data showed them that they cannot close the achievement gap with students remaining in self-contained classes most of their day.

The following are descriptions of the various aspects of District D's support model:

Consultant Teacher Services

Consultant teacher services provide direct and/or indirect services to students with disabilities within the general education classroom. Consultant teacher services are considered indirect when the support is provided to the general education teacher. The IEP must indicate the subject areas in which the student will receive consultant teacher services. Consultant teacher services are available in grades K through 8.

Integrated Co-Teaching

Integrated Co-Teaching (ICT) is the provision of specially designed academic instruction to students with disabilities alongside nondisabled peers. In an ICT classroom, the general education and special education teachers share responsibility for classroom instruction. Curriculum, materials, assignments, and assessments may be modified to meet the individual learning needs of all students. District D offers ICT classes in grades K and 1 and grades 7 through 11. Over the next five years, the District will be expanding ICT services to include all grades K through11.

Resource Room Program

The resource room program is a special education service that supports students with disabilities with specialized supplementary instruction, in a small group setting, for a portion of the school day. Resource room programs are for the purpose of supplementing the general education or special education classroom instruction and are offered at the high school level in grades 9 through 12.

Special Class

Special Class is a class consisting of students with disabilities who have been grouped together because of the similarity of individual needs for the purpose of receiving specially designed instruction in a self-contained setting. Students in a special class are receiving their primary instruction separate from their nondisabled peers. District D offers special classes in grades K through 12. At the elementary level, there are classes to support students with intensive language and learning needs, emotional challenges, and developmental delays. At the middle school level, the District provides self-contained classes in each of the content areas along with a continuation of classes for students with developmental delays and intensive language needs. In high school, classes are provided in math, English, social studies and science in grades 9 through 12. Students can access all or some of the classes as necessary to meet their needs. In addition, there is a Therapeutic Support Program at the high school level for students whose emotional needs impede their progress in the general education setting.

District E

In addition to special programs for students with autism and behavior needs, there are several ways services are offered in District E.

Consultant Teacher Services

This is offered in two ways, direct and indirect. Direct services are those that a special education teacher provides directly to the student in his/her classroom. Indirect services are provided by a special education teacher by working with classroom teachers to support students in the general education classroom.

Resource Room

This is a “learning resource center” pull-out program. A student assigned to the resource room has no less than three hours of instruction per week. This may be received in combination with consultant teacher services for no less than three hours each week total. The special education teacher works on academic skills, strategies, and organization within the context of the curriculum.

Integrated Co-Teaching

Integrated Co-Teaching occurs when two or more certified teachers jointly deliver substantive instruction to a diverse, or blended, group of students in a single physical space. School personnel assigned to each class minimally include a special education teacher and a general education teacher. Co-teaching classes are available in all elementary schools but may not be at every grade. The following co-teaching models are used: 1) One teach, one observe; 2) Station teaching; 3) Parallel teaching; 4) Alternative teaching; 5) Teaming; and 6) One teach, one assist. At the middle school level, teachers are paired by grade and content area to provide co-teaching.

District F

Like District A, District F has placed considerable effort into designing an inclusive culture. The District believes that special education is a service, not a location or a placement. Within its state, District F has the highest percentage of students (88.6 percent) served in the general education classroom more than 80 percent of the day, while 16.4 percent are served in general education between 40 and 79 percent of the day, and less than four percent are served in general education less than 40 percent of the day.

Special education supports and services are provided both inside and outside the general education classroom. Inside the general education classroom, services are provided by both the special education teacher and the general education teacher. In collaborative classrooms, the general educator and the special educator are equally responsible for instruction, grades, discipline, and planning for all students. Outside of the general education classroom, a special educator provides students individual or small group instruction. The amount of service provided outside the general education setting is determined by the IEP team. The District has tried various models and attempted to remove the co-teaching model at one point.

An ideal ELA model for District F is for the special education teacher to not be in the general education classroom for the whole period. For example, special educators may be in the class for 60 minutes of a 90-minute block so they can support multiple classrooms.

The District also has several specialized programs, detailed below:

Responsive and Individualized Structured Environment (RISE)

In these multi-grade elementary classrooms, three special education and general education teachers work collaboratively to deliver both academic and behavioral instruction to students. The classroom typically consists of eight to 12 students. Students are from schools in the surrounding region and are placed by IEP teams in the RISE program to provide a temporary small group, highly structured setting to address targeted behaviors. Students begin in RISE and are gradually reintroduced to the general education setting as they are able to demonstrate appropriate targeted behaviors. Once students are integrated into the general education setting to the maximum extent possible, the IEP team reevaluates the placement and determines if it is appropriate to transition the student back to their home school. The model is the same at the middle school except for the number of teaching staff. In the multi-grade middle school classrooms, two special education and general education teachers work collaboratively to deliver both academic and behavioral instruction to students.

There are two types of RISE programs:

- RISE-C: This program serves students with significant communication needs and may also have behavior challenges. It is staffed by a full-time special education teacher, a full-time speech therapist, and a paraeducator. The program was created because the District wanted to reduce the number of students with significant communication needs being referred to non-public schools.
- RISE-B: This program was designed to be a short-term, 45-day placement for students with more significant behavior concerns.

For students who take the alternate assessment (usually the determination is made at 3rd grade), many are served in the communication program. The majority of these students are served in the general education setting. The District trains elementary general education teachers to provide supports and services for students who take the alternate assessment. Special education teacher provides adaptations to the resources.

Learning for Independence (LFI)

The Learning for Independence (LFI) program provides students ages 18 to 21 the opportunity to develop the life skills necessary to function more independently in the community. It provides students who are working towards a Certificate of Completion a wide array of opportunities to develop the skills necessary for supported community-based employment as a postsecondary goal.

Partnership Seat Program

Partnership Seat Program provides an interim placement for students who exhibit significant emotional difficulties, with a short-term opportunity to receive intensive services (social skills instruction and counseling as needed) that will allow students to return to a less restrictive setting within their home school. In partnership with the District, this contracted program is able to provide a small and highly structured educational/therapeutic setting that includes individual and small group counseling sessions to address each student's individualized social and emotional needs. Students who attend the partnership program have a greater opportunity for transitioning back to their home school with the appropriate supports and implementation of a more prescriptive behavior management program. This program began in the 2020-21 school year.

Student Transition and Employability (STEP) Program

The STEP program provides transition-aged youth with a range of disabilities throughout the county the opportunity to receive modified instruction based on competencies within the state career development framework in a dual enrollment program with a local technical school. STEP allows students to develop a range of employability skills in the following school-based work environments: screen printing, embroidery, and engraving. This program was designed for students with IEPs in high school. They spend the first period of their day at their high school and then leave to go to the tech center.

Staffing

Staffing was often mentioned by interview participants in the context of programming, in that resources were allocated to support specific programs, caseloads, or instructional approaches. Participants also mentioned practices their districts have adopted to plan for changes in student needs throughout the year.

In District A, prior to the start of budgeting for the upcoming year, case managers complete a "student summary template" for each school. This spreadsheet template includes all students with IEPs in the building and lists each one's individual amount and type of service. Principals can then sort this information to ascertain how they can develop a schedule (not based solely on blocks of time or specific classes) and allocate enough staff to address all needs. The special education central office staff then monitor monthly reports of student numbers, services required, and staffing throughout the school year so they can add additional teachers or paraeducators mid-year as needed. Adding staff is rare, but they have the fiscal support to do so as needed.

District D has a similar projection system. The process starts in October of the prior year when teachers project, and document on a spreadsheet, where they believe their students will go to school the following school year. The special education central office staff monitor these numbers regularly. Given the attention to monitoring, it is rare that significant staffing adjustments need to be made mid-year. There is also an emphasis on doing "the right thing for children" as the driving factor, rather than money.

The interview participant in District B acknowledged that special education staff try to make their "best guess" based on data to project staffing needs for the upcoming year. Changes do happen mid-year though, and the school board and superintendent are reportedly supportive of staffing additions when data justify the need. In order to plan for these needs, the special education department has adopted the practice of putting two to three paraeducator positions into the IDEA budget each year as placeholders. Since IDEA funds roll over year to year, they can either carry forward the money or release it at the end of the year for other purchasing needs.

In District E, building coordinators, who support special education programs in schools, complete a matrix, looking at every student in the building, identifying their needs, and then determining scheduling. The average student to special education teacher ratios are 10:1 at the elementary level; 12:1 at the middle school level; and 13:1 at the high school level.

Out of District Placements

While all participants shared that some students from their districts attend out of district (OOD) placements and that this was expected when considering the full continuum of services, none of them thought that these numbers were too high given their District's size. In three cases (Districts A, B, and D), there had been conscious efforts over several years to design and build in-house programs to decrease the number of out of district placements and to attract families back to the district. One interview participant said they had to "change the narrative that out of district was better." The other two used similar language to describe the District's intentional efforts to address this issue. As a result, many have also seen settlement agreements and requests for tuition for parentally placed students decrease.

Interview participants shared the following information about how their District plans for students with significant needs:

- **Appropriate Use of OOD Placements.** The interview participant in District B said that the district sends students with the following significant needs to out of district placements: emotional disabilities requiring advanced mental health support, autism (mostly non-verbal students with behavioral needs), intellectual disabilities, and some multiple disabilities. In District E, some students with multiple disabilities and emotional disabilities attend a regional program, and a few are in residential placements. Overall, though, their numbers are low, and they have very few parental placements. District C has a similar situation, in that not many students attend out of district placements, and those who do are generally on the autism spectrum. The interview participant shared that District C has the lowest percentage of students enrolled in private schools in the region. District F has on average between 53 and 62 students in non-public placements. The interview participant noted that these numbers are appropriate for the size of the District and that most students with significant behavior concerns or autism attend a local program that the District contracts with a local provider to offer. The District also has 10 full-time "partnership seats" in a non-public setting for students requiring short-term (two weeks or less) intensive support. District D has a private school specializing in supporting students with language-based disabilities within its boundaries, and there are about 40 to 50 students unilaterally placed there annually. Only a handful were placed there through a due process agreement. The District expects these numbers to remain about the same annually given the proximity of this school.
- **High-Quality Programs.** Several years ago, in District A, there were many disputes with parents around reading. The District then trained teachers in Wilson Reading, which decreased the requests from parents to send students to specialized programs outside of the district. There was a similar situation in District B, where the district decided to invest in teacher training specific to supporting students with dyslexia. Now they have strong programs so parents of students with dyslexia and other language-based disabilities want to stay in the district. District D also focused on building quality programs. This became a district-wide initiative after several principals visited out of district placements/private schools and were surprised at what they perceived as a lack of quality instruction. As a result, the principals wanted to bring students back to their schools. They began to work on building high-quality programs district-wide and to hire new teaching staff with intentionality to support this work.

Multi-Tiered System of Supports and Special Education Referrals

Overall, interview participants shared that their districts have had the tenets of an MTSS framework in place for many years, though variation still occurs between schools. In several districts, the interview participants said they use the term "child study team" or "instructional support team" to describe the problem-solving teams at the school level. There was a general sense that these teams are not consistent enough from school to school and that changing teacher beliefs was a large part of the challenge. One participant said teachers in her district believe of students: "If they are found eligible, they aren't my problem anymore." All participants conveyed they must routinely message that special education is not a "magic cure."

The following three themes emerged from these interviews regarding MTSS and special education referrals:

- **Data Use and Documentation.** In District F, there is a belief that school teams do not use or review data frequently or consistently enough when considering moving students forward for special education evaluations. District D said that they lack consistent criteria on how long students should remain in an intervention cycle and what data to use as evidence of progress. Conversely, school administrators in District B attended Harvard University's Data Wise Institute to learn best practices on what data to collect and how to collect it. In District E, elementary schools use an RTI plan document, with progress data contained therein, for each student at each tier. Middle schools and

high schools do not have specific written plans but have support classes of no more than 15 students each built into the schedule.

- **Intervention Support.** Several districts discussed how they approach screening and intervention support. Districts A and D conduct universal screenings and schedule students into interventions as needed. Similarly, District B has an intervention support model, with reading and math interventionists at the elementary level, that gets students additional support as soon as their teachers see them struggling. District D has universal screeners and interventions available in schools. District E focuses on reading and math at the elementary school level, with a specialist in every building to provide intervention support, and school teams monitor student progress closely using data.
- **Eligibility.** In District B, four or five years ago, students were considered for a special education referral if they did not come into kindergarten already reading. The district has since implemented a phonics-based reading approach and has trained staff further on reading strategies and developmental expectations. District B is also in the process of reviewing data and evaluation practices to determine why students of color are found to be eligible for special education services at a higher rate. In District E, referrals for special education are not accepted unless there has been an intervention in place first. If a parent requests the evaluation, school principals meet with parents about pursuing an intervention plan first.

On a final note, the participant from District D said that they are looking to "tighten up" the RTI framework to make it better and will be embarking on a comprehensive review of RTI practices in the coming year.

Professional Development

Participants cited both the successes they have had with delivering high-quality professional development in their districts, as well as the challenges they have encountered in ensuring all staff have adequate training. In all districts, participants described how professional development occurs year-round, ranging from half-day to full-day sessions throughout the school year at both the building and district levels to summer institutes. They all emphasized that ongoing staff professional development is critical to the growth and success of their students.

Several districts mentioned that professional development is usually taught by teachers or other experts, such as central office curriculum content managers. A few talked about bringing outside experts in to hold specialized sessions, such as for restorative justice. District A said that having a learning coach team, consisting of teachers on special assignment (TOSAs) who provided coaching, mini-lessons, and modeling, was the most effective in terms of positively impacting teacher practice. One district noted how challenging it had been to work in partnership with their office of curriculum and instruction. As a result, professional development for special education and general education teachers was often fractured and inconsistent. District D hired elementary school instructional coaches who are charged with providing job-embedded coaching to teachers. All participants mentioned how their districts provide ongoing professional development opportunities on core content. Special education teachers can generally participate in these sessions alongside their general education peer teachers, and while this is positive, pulling them for specialized training is often complicated.

Three districts discussed trainings specifically for paraeducators. District A provides 20 hours of paraeducator training annually, and District E provides training one day a year on behavior, de-escalation strategies, data collection, and characteristics of disabilities. District F provides training for paraeducators four times per year, which consists of modules specific to their role or area of need.

In two districts, (A and E), the recent professional development focus has been on equity. One said that they had focused on special education and equity in the past, but that their focus now will be on culturally responsive teaching, racial inequities, and anti-bias training.

Several participants said their districts will likely continue to do more virtual and/or hybrid trainings in the future, given the ongoing pandemic and lessons learned from this past year. From District E, the interviewee said: “We have been working, working, working to keep ourselves in a holding pattern. We are very anxious to get back to a new normal next year to support staff again.”

Family Engagement

Interviewees shared a variety of feedback on family engagement in their districts, ranging from obstacles that prevented them from building relationships and/or growing a Special Education Parent Advisory Committee (SEPAC) in the past to strategies that improve family engagement.

In terms of challenges, the interview participant from District A talked about how it took a conscious effort to broaden their SEPAC membership. Some parents had been hesitant to join it in the past because those leading it had a more adversarial approach and were engaged in litigation with the district, which alienated many parents. Litigation was also mentioned by the interview participant in District C as a roadblock to family partnership, sharing that district staff were often timid with families they knew were pursuing suits against the district or brought attorneys into the IEP conversation. The interview participant from District F said that while they have an organized SEPAC, membership is small, and they have difficulty getting more than 10 participants on average to attend monthly meetings.

A few themes emerged as to how best improve family engagement. These included the importance of having an active and informed family resource center, focusing on growing the SEPAC in partnership with the District, and placing a concerted emphasis districtwide on building positive, collaborative relationships between school/district staff and families. Districts shared the following approaches to these areas:

- **Family Resource Center**. Districts D, E, and F have family resource centers that support all parents, including those who have children with IEPs. In one district, the family resource center staff provide direct support for parents at IEP meetings when they request it (i.e., a parent can request that someone from the family resource center serve as an advocate). District D also has plans to expand wraparound support for families by opening mental health centers and food pantries in schools.
- **SEPAC.** In District E, the SEPAC offers monthly presentations for parents, often done in conjunction with District staff. District B also has a very active SEPAC that coordinates information sessions for parents and has time to share and problem solve on each monthly agenda. In District C, the Parent Teacher Association (PTA), which reportedly is well-resourced and influential, has established subcommittees for special education, equity, and other topics. Parents there are also beginning to have conversations about starting their own SEPAC as well.
- **Relationship Building.** The special education supervisor in District A holds routine meet and greets with parents and makes it a priority to respond to parents quickly. The associate superintendent in District D, who supervises the special education director, facilitates parent coffees five times per year and believes they have been helpful in allowing parents to feel heard. These meetings have no agenda, are designed to be listening sessions, and act as a pressure valve to allow parents to vent frustrations. The format also allows parents to share information with a more objective third party, rather than directly with the special education staff. These coffees were instrumental in defusing an issue at a school that could have escalated because of mistrust and rumor spreading, as the parents themselves helped develop a solution alongside the District staff. District C has made some structural changes so that parents do not feel they have to advocate so strongly, and staff feel they can have open conversations with parents. IEP teams there now consist of two psychologists (one building based and one district level) and two testing specialists. Administrators are not a part of these meetings unless there is a concern than warrants their attendance. District B credits the shift to virtual meetings during the COVID-19 pandemic for allowing much higher parent attendance at meetings and trainings. They have also recorded these

sessions, which was a powerful way for parents who are non-native English speakers to engage at their own pace.

Biggest Challenges in Special Education

When asked about the biggest challenges specific to special education facing their districts, peer district interviewees shared a variety of issues:

- The interview participant from District A said that working alongside the union required significant time and attention and that, ultimately, the partnership reached a stalemate around support for inclusive practices.
- In District B, there are two pressing challenges. First, there has traditionally been an overreliance on paraeducators, and they are working on exit criteria checklists to support IEP team conversations about fading supports as appropriate. Second, the interview participant shared that mental health concerns among students, especially at younger ages, have been growing. One example shared was of a fourth grader recently hospitalized for anxiety. Additionally, ramping up mental health supports will be a central focus for next year due to of the COVID-19 pandemic. In preparation, District B has implemented Responsive Classrooms at the elementary level this year to relieve the pressure students feel, the goal being to make students feel happy and safe. They are also exploring other ways to support students who feel pressure from home that they "lost" a year and a half of school by re-messaging to students and families that the world lost this time as well.
- The interview participant from District C cited the resource-heavy model of their special education programming as a challenge for sustainability. While best practice is to include students as much as possible, the expansion of inclusive practices may not be financially feasible.
- The interview participant from District D shared that they continue to struggle with school staff mindset around inclusion and that co-planning at the high school level is a significant barrier to growing collaborative teaching. They are also continuing to focus on the science of reading, by helping teachers to understand how to identify potential gaps for each student, as well as IEP goal writing and progress monitoring.
- In District E, the focus is on changing referral practices because of two factors: a state finding around overidentification, specifically white students with Other Health Impairments, and the recent increase in the number of external evaluations parents are producing.
- The interview participant from District F said that staffing remains an obstacle. Finding qualified related service providers has been a challenge, and while contracting has been a solution, the inconsistency of providers has impacted programming. Also, due to budget constraints in prior years, inclusion coach positions were eliminated. There is concern that students with IEPs will be placed in more restrictive environments because general education teachers do not have the coaching support to make inclusive practices work.

VII. RECOMMENDATIONS AND ACTION STEPS

PCG saw ample evidence that GPS has a solid foundation on which to build. GPS has many notable strengths, including its passionate and knowledgeable staff and its willingness to undertake this review and act on the recommendations as part of a continuous improvement cycle.

The following recommendations are considered priority recommendations. Each are interrelated and will require a significant investment on the part of GPS to undertake. Implementation of these recommendations will set the foundation for all other action steps that emerge from this report. The action steps listed under each recommendation below are organized in a manner that provides a comprehensive view of the activities required to initiate change. Although components of the action steps can be implemented within a shorter timeframe, full-scale implementation of the recommendations may take three-to-five years.

PCG has mapped the recommendations in this report to the Special Education Effectiveness Domains. Action steps corresponding to the recommendations are included below.

Domains	Recommendations
Learning Environment and Specialized Services Delivering instruction and interventions within an inclusionary framework and with IEP fidelity, leading to increased access and progress in grade-level learning standards and reducing disproportionality	1. Multi-Tiered System of Supports 2. Universal Design for Learning 3. Identification Practices and Disproportionality Monitoring 4. IEP Development 5. Inclusive Practices Planning, Guidance, and Implementation 6. General Education Classroom Composition, Collaborative Teaching, and Co-Teaching 7. Redesign and Rebrand Academic Labs 8. Redesign and Rebrand Comprehensive Program Models 9. Equity and Access to Advanced Placement for Students with Disabilities 10. Twice Exceptional 11. Special Education Transportation 12. Assistive Technology 13. Out of District Placements
Leadership Supporting students with disabilities (including increased collaboration and ownership of school administrators and staff) and coordinating efforts with community organizations to improve results	14. Inclusive Education Vision and Planning 15. PPS Organizational Structure 16. Cross-Departmental Collaboration

High Expectations Increasing expectations of students with disabilities by presuming competence and incorporating culturally relevant, growth-oriented practices	17. Academic Optimism and Growth Mindset 18. Elevate Rigor 19. Measure Instructional Beliefs and Practices
Human Capital Investing in people from recruitment to retirement to ensure highly qualified and effective staff have the skills/training needed to provide services and support to promote the success of diverse learners	20. Professional Development
Systems and Structures Defining expectations for service delivery, resource allocation, and data management infrastructure to guide data-driven decisions	21. Special Education Policy and Procedure Manual 22. Transparent Staffing Allocation Model 23. Out of District Placement Student Data and Financial Monitoring
Family and Community Engagements Embracing partnerships to make informed decisions and provide equitable opportunities for all students	24. Enact Report Recommendations 25. Family Friendly Guides 26. Website 27. Parent Trainings 28. Family Engagement Vision

Learning Environment and Specialized Services

1. Multi-Tiered System of Supports

- **MTSS framework.** Build on GPS's current RTI and PBIS processes to develop a unified and clear structure of MTSS for academic achievement, positive behavior, and social/emotional growth (including enrichment) for all students. Create guides to explain how the intervention models, such as RTI, PBIS, etc., complement each other.
- **Districtwide leadership team.** Develop an MTSS cross-departmental district-level leadership team, including senior leadership, school principals, and representatives from every educational unit (e.g., special education, Title I, bilingual, gifted, etc.). Schedule meetings at least monthly to review, update, operationalize, and monitor the fidelity of MTSS implementation. Establish comparable school-based leadership teams to oversee MTSS implementation at each school.
- **Expectations.** Establish, communicate, support, and monitor clear expectations for MTSS, with clear lines of accountability and responsibility across departments and schools, aligning them with relevant standards and guidelines.

- **Guard rails.** Determine what expectations will be required district-wide and which will be a school-based decision. Incorporate the expectations into administrator, principal, teacher, paraprofessional, and related-service personnel evaluations.
- **School-based MTSS teams.** Require all schools to operate a school-based MTSS team to support problem-solving, data-based decision making at all tiers to support academic advancement and positive behavior, and consistency between schools. Ensure principals schedule time for teams to implement the problem-solving process, meet and review progress monitoring and intervention data, be empowered, and be held accountable for adjusting school schedules to provide the necessary supports for all struggling students.
- **Written guidance.** Create an electronic user-friendly, and accessible MTSS manual for school teams and for parents to understand the MTSS process and to document procedures/practices relevant to the management/operation of MTSS in GPS. Include protocol for collecting progress monitoring data and assessing student growth; what constitutes adequate progress and associated lengths of time to allow for progress, and requirements for initiating a special education evaluation when such progress is not shown. Ensure a common understanding and buy-in around the district for the need for MTSS, why and how it is implemented, what desired targets it is intended to meet, and what progress the division is making toward achieving the goals. Maintain the manual by updating it regularly as there are changes to policy or practice.
- **Electronic dashboard**. Develop a transparent and widely accessible district-wide early warning dashboard to monitor student intervention data use and growth for academics and behavior to enable leadership at the central office and schools to review MTSS (RTI and PBIS) implementation and student growth, identify patterns, solve problems, and make data-informed decisions. Review and expand upon rubrics currently in use to have a universal set of documents that are relevant based on grade levels and types of schools.
- **Universal screening.** Decide upon and purchase standard evidenced-based universal screening tools for academics, including dyslexia, and behavior and implement them throughout the district, with an initial focus at the elementary level.
- **Professional development**. Provide MTSS professional development (inclusive of RTI and PBIS) for all school-based staff. Have central office staff develop turn around trainings for school-level staff, so a unified voice is heard throughout the district.
- **Equity**. Provide training on the implications of race/ethnicity/language, socio-economic status, and culture constructs for MTSS teams when developing student intervention plans.

2. Universal Design for Learning

- **Training.** Provide clear guidance and mandatory training for all district and school leaders, and teachers on the principles of UDL and how these principles can be applied in the development of curriculum, instruction, and assessment. Leverage assistant principals and teachers who previously received UDL training to help guide training content based on their lessons learned and to actively support the training process.
- **Implementation.** Use UDL principles consistently so that all students can access grade-level material and can help close achievement gaps between students with disabilities and their nondisabled peers. Consult with technology leaders and personnel about potential purchases and associated potential impact on their work.

3. Identification Practices and Disproportionality Monitoring

- **Tracking disproportionality in disability identification.** At least quarterly, use the risk ratio to measure the identification rates of students with IEPs by race/ethnicity and other important indicators, such as language status, free and reduced lunch status, giftedness, etc., to identify any student group that it is two times more likely than peers to be identified as being over-identified (i.e., risk ratios).
- **Tracking activity timeliness.** Analyze timelines to assess if there are delays in providing interventions, delays in determining inadequate student progress, delays in initiating a special education evaluation (based on data), and evaluation completions.
- **Tracking school identification rates.** Analyze longitudinal data to determine which schools may be identifying students with IEPs at a rate that is disproportionately higher than other schools.
- **Data review and hypotheses.** With a cross-departmental group of leaders and staff, use this data to develop hypotheses for identified disproportionate risk ratios for any group of students, delays in the evaluation referrals and completions, and/or schools with disproportionately high new identification rates.
- **Follow-up action.** Based on these hypotheses, develop any additional written guidance needed to clarify procedures and practices, consider any additional resources and strategies needed along with a written plan, if appropriate, and provide training to support implementation. For example, identification disproportionality training would include the implications of race/ethnicity/language, socio-economic status, and culture constructs for school-based teams when considering students for an evaluation.
- **Monitoring.** Based on the areas of practice identified through the above activities, identify data to be collected and monitored, along with any practices to be monitored, to support consistent implementation across GPS and to identify schools needing additional support or intervention.

4. IEP Development

- **Written procedures.** Include in GPS's written special education guidance standards and examples for IEP development processes that are appropriate and consistent across the district. Guidance would include but not be limited to Present Levels of Academic Performance (PLOP) and data use within; IEP goals; accommodations; and progress reporting. Include a procedure for discussing additional material and human resources than those currently available to meet a particular student's needs, including those needed for students who would otherwise be placed out of district.
- **IEP goals.** Ensure IEP goals are based on student needs identified within the PLOP ensuring that goals are not being created or influenced by district limitations within GPS's current continuum of services.
- **Monitoring IEPs.** Establish and implement a process for periodically reviewing student IEPs for their consistency with expected standards. Consider using a school-based process, which would include an impartial GPS facilitator to review, analyze and discuss IEPs with teachers and related service providers.
- **Electronic data repository.** Study electronic data repositories to improve data collection ease and subsequent reporting of student data for quarterly IEP progress reporting to choose one that would meet GPS needs.

- **Collaboration.** Foster positive PPT collaboration by creating more planning time between general education and special education teachers; ensuring adequate time and coverage for staff participating in PPT meetings; and transparent processes around timelines, data, and information sharing with parents to enhance trust and partnership among all PPT members. Provide interpreters for parents who are non-native English speakers and translate IEP documents.

5. Inclusive Practices Planning, Guidance, and Implementation

- **Inclusive education framework.** Develop and use a structured framework/model that will help promote and support the implementation of best practices for inclusive education including the provision of high yield collaborative teaching, specially designed instruction and related services. As part of this process, consider the Recommendations 6 – 13 below.

- **Implementation guide.** Develop a clearly articulated district/school implementation guide based on the inclusive education framework with expected guidance, procedures and practices. Determine the role of schools to adapt the framework to their unique needs versus GPS requirements. This process could also include GPS's advance approval for a school to adapt the framework with deviations GPS defines as significant.

- **Scheduled time for collaboration.** Establish written guidance for the use of inclusive master school schedules, which establish common planning time for collaborative teaching, co-teaching, and other activities for general educators with special education and other personnel. Develop various scheduling models that schools could use and/or adapt.

- **Cross-department collaboration.** Through intentional collaboration between interim PPS Chief and her leadership team, Director of Curriculum and Instruction, and Math and ELA content specialists; further study achievement and suspension gaps between students with IEPs and their typically developing peers on state standardized assessments, and between students with IEPs by race/ethnicity, English learner status, social economic status, gender, etc. Use this information to inform discussions about improving GPS's continuum of services, including making inclusive instruction more effective.

6. General Education Classroom Composition, Collaborative Teaching and Co-Teaching

- **General education classroom composition.** Establish a maximum student classroom ratio for students with and without disabilities for general education and monitor the ratio to ensure these configurations are not "inclusion in name only" and do not comprise a majority of students with IEPs and 504 Plan taught solely by general education teachers.

- **Collaborative consultation.** Draft guidance for collaborative and consultative teaching to support students with disabilities. Under this model, general educators along with one or more other educators (e.g., special educator, reading specialist, EL teacher, gifted/talented teacher) collaborate around the designing, delivering, monitoring, and evaluating of instruction in general education classes, with the general educator providing instruction.

- **Co-taught instruction.** Draft guidance for the delivery of co-taught instruction based on the most effective model for instruction purposes and use of the special educator.[126] Based on the developed guidance, provide intensive professional development and follow-up coaching and modeling to give co-teachers the information and support they need to be true partners in the

[126] See Marilyn Friend's website, *The Co-Teaching Connection* for information about six models of co-teaching, retrieved from http://www.marilynfriend.com/approaches.htm, as well her home page with additional resources, retrieved from https://coteach.com/.

planning and delivery of classroom instruction. Monitor implementation through classroom walk through activities that are guided by observation protocol for this purpose.

- **Professional development.** Provide professional development on collaborative teaching, co-teach to ensure teachers engage in a true instructional partnership. Provide planning time for general education and special educators and others to become true collaborative partners.

7. Redesign and Rebrand Academic Labs

- **Rethink Academic Lab model.** Reimagine and rebrand Academic Labs by providing written protocols for all grade levels for a flexible grouping model in which students with disabilities are provided intensive supplementary instruction in areas no longer covered by grade level core curriculum. For example, phonemic awareness, phonics, fluency, math computation, etc. Ensure these classes have the materials students need to increase the trajectory of their learning in their particular area(s) of need. View this setting as an extension of classroom instruction for students with IEPs who need short bursts of additional time outside for these purposes to learn grade-level content.
- **Inclusive supplemental learning model.** Consider staffing a learning model for students with and without disabilities with a general educator to supplement regular classroom lessons to introduce lessons with more intensity and reinforce what was taught.
- **Professional development.** Provide professional development for teachers involved with these models so they understand their roles and can carry them out.

8. Redesign and Rebrand Comprehensive Program Models

- **Analyze current comprehensive classes.** Complete a deeper analysis of students, instruction, and materials in each of the current Comprehensive classes (area of disability, skill level, communication and other supports provided, assessment data, student-teacher-paraprofessional ratios, etc.) to create an accurate description of who and what is taught. Also, for each class by Comprehensive intensity, assess student profiles that include their individual instructional needs, as well as progress they have made over the past school year.
- **Reconstruct instructional models.** Based on this program review, analyze gaps in instructional needs, materials, assistive technology, student to adult ratios, etc., within and between current programs. Create and rebrand with new models that collectively address all individualized student needs and is flexible enough to maximize the receipt of grade-level content, interaction with nondisabled peers, and improve achievement and positive behavior along with social/emotional well-being. Continue to resist grouping students by disability label and instead rely on their learning needs regardless of disability nomenclature. Furthermore, do not limit resources to a particular instructional model. Instead allow for flexibility so learning materials and other resources are allocated based on student need and not dictated by a particular model. Document the models with written information to inform professional development and resource needs.
- **Professional development.** Provide professional development for all personnel associated with the newly developed models of instruction. As part of the more generalized professional development specified in these recommendations, emphasize that in all circumstances it is not appropriate for students to be referred to by their placement name (e.g., “comprehensive” or “mildly comprehensive students,” etc.), as using such titles is not respectful and is stigmatizing. Instead, emphasize the use of “people first” language, where the emphasis is on students and not their placement.

9. Equity and Access to Advanced Placement for Students with Disabilities

- **Address barriers to equity and access.** Develop a coherent plan across grade levels and schools to enable a higher proportion of potentially qualified students with disabilities to benefit from advanced academic studies/courses. As part of this process, consider teacher and parent input to analyze current barriers to access for students with disabilities and develop a plan to mitigate these challenges.
- **Written guidance and training.** Provide written guidance and other information to IEP teams, school-based staff, and parents about how students with disabilities can access advanced placement courses, with appropriate supports and accommodations.
- **Track increased enrollment.** Establish a goal and target to increase current enrollment of students with disabilities in advanced placement and other enrichment/advanced learning courses, and monitor enrollment data on a quarterly basis.

10. Twice Exceptional

- **Identification as student who is gifted.** Establish parameters for GPS's identification of students who are to give clarity to students who are "twice exceptional," i.e., students with disabilities who are gifted. Ensure that GPS's usage of the gifted term aligns with state guidance and data reporting requirements.
- **Potential for gifted identification.** Review records of students with disabilities for data to identify those with advanced aptitude or skills to support potential identification as a student who is gifted.
- **Guidance, training, and support.** Provide schools with the guidance, training, and support necessary to better understand how to implement viable programming and strategies for twice exceptional students to: nurture the student's potential; support development of compensatory strategies; identify learning gaps and provide explicit instruction; foster social and emotional development; and enhance their capacity to address their mixed ability needs.

11. Special Education Transporation

- **Protocols.** Develop protocols to provide clear delineation and communication between the Transportation Office and the PPS Office. Include a provision that requires the PPT meeting notice to include transportation personnel when non-routine transportation is likely to be discussed. Also, include a provision showing who would be responsible for sharing the PPT notice and meeting invitation to specified transportation personnel. Also, if transportation based on student disability needs is not clearly written and understood, include this information in the transportation protocol.
- **IEP required transportation.** Clearly define the role of the Transportation Office as it relates to the PPS Office to ensure that once an IEP includes transportation services, the transportation personnel must implement the service regardless of whether they agree or disagree with the PPT decision.
- **Monitoring.** Monitor the protocol to ensure it is implemented as intended.

12. Assistive Technology

- **AT plan and quality indicators.** Create, and implement with fidelity, an AT Plan and measure its overall success by using the Quality Indicators of Assistive Technology (QIAT), which is designed to assess overall quality of AT programming.
- **Professional development.** Provide staff training on how AT (low and high-tech devices) can be used for a myriad of student needs.

13. Out of District Placements

- **Parent outreach**. Talk with parents and PPT teams who sought or obtained an out of district placement to better understand their motivations and GPS program gaps.
- **School assessment**. Visit or obtain other information about the most common out of district placements to ascertain how these resources are different from any currently available for any student in GPS schools.
- **Cost analysis.** Consider the cost of out of district placements, including costs associated with transportation and complaint/due process resolutions, and how this money can be used instead to provide these and other resources within GPS schools. Use this information to develop the instructional models described in the above recommendations.

Also see Recommendation #23, which pertains to monitoring of out of district placements.

Leadership

14. Inclusive Education Vision and Planning

- **Guiding vision and mission.** Have the Board of Education and GPS management include effective inclusive education in their vision and mission.
- **Clear expectations.** Either in the vision/mission or other document communicate to schools, parents, and the broader community that GPS expects and will take steps to ensure 1) students with disabilities make the greatest amount of progress possible in the general education curriculum (or modified curriculum per IEPs) through rigorous and high quality standards-aligned instruction, and specially designed instruction and interventions, along with differentiated instruction, accommodations, and modifications; and 2) partnerships with families are trusting and collaborative.
- **Strategic plan.** Develop a long-range strategic plan based on the above recommendations as well as other relevant information.

15. PPS Organizational Structure

- **Organizational structure**. Reorganize the PPS Office by function, reducing the number of direct reports to the Chief and adding instructional coaching positions specifically designed to model/support use of high-quality inclusive practices and specially designed instruction by special educators. Either change the name of the department to one such as Specialized Instruction and Support Services or clarify the functions within the existing office so all are clear on its focus.

16. Cross-Departmental Collaboration

- **Schedule collaborative meetings.** Establish a schedule for routine, collaborative meetings between the PPS Office and other departments, e.g., English learners, with individuals necessary to share information, problem-solve, and resolve issues of mutual concern. Ensure all central office personnel who support schools meet to share information about common issues they can collectively address.
- **Collaborative work.** Use these collaborative partnerships to establish consistent and integrative approaches to support improved instruction for various purposes by creating cross-functional workgroups.

- **Key performance indicators (KPIs).** Set goals for all cross-departmental initiatives and establish KPIs with targets to measure the extent to which they are beneficial or require modification.

High Expectations

17. Academic Optimism and Growth Mindset

- **Communication of high expectations.** Set high expectations both through establishing an inclusive vision (see recommendation #14 above) and through joint statements from the superintendent and Board of Education regarding the provision of rigorous instruction and supports and related services delineated in IEPs so students have the necessary tools they need to access high quality instruction.
- **Collaboration support.** Guide the design of intentional structures and resources needed to help foster greater collaboration across disciplines, grade levels, and areas of specific expertise.
- **Monitoring.** Develop and implement protocols for fidelity checks on IEP delivered versus prescribed instruction and services (e.g., co-teaching, instructional and testing accommodations/ modifications, specially designed instruction, related services, etc.).

18. Elevate Rigor

- **Professional development.** Ensure that all professional development designed and delivered elevates instructional rigor that is inclusive of students with disabilities. Focus information on best practices for motivating learners and setting high expectations, addressing UDL and differentiated instruction, progress monitoring, and mastery of learning.
- **Resources.** Include how this information will be supported with necessary material and human resources.

19. Measure Instructional Beliefs and Practices

- **Annual teacher survey.** Conduct an annual survey to measure teachers' instructional beliefs and the extent to which they understand presumed competence. Analyze results by school and teacher role.
- **School plans.** Develop a plan protocol by which each school site would design instructional and support improvements to increase student achievement and positive behavior outcomes over time.

Human Capital

20. Professional Development

- **Plan.** Develop a professional development plan based on the needs identified in this report targeted to different audiences, e.g., general educators, special educators, related service personnel, paraprofessionals, parents, etc.
- **Learning forward standards.** Ground training in the Learning Forward Standards for Professional Learning[127] and embed the following components:

[127] Retrieved from http://www.learningforward.org/standards#.UMvVD7Yt0kU

- **Mandatory annual trainings.** Because of the importance of principal and assistant principal leadership on special education matters and PPT meetings, establish a robust training plan for principals and other school-based administrators on areas of mutual informational needs specific to special education administration. Determine which trainings principals and other school-based administrators are required to attend each year and develop a process to ensure this happens.
- **Cross-functional teams**. Cross-train individuals from different divisions/departments to maximize their knowledge and skills to leverage their collective resources to provide direct support, mentoring, coaching, and technical assistance to principals and teachers.
- **High quality trainers.** Ensure that all trainers are knowledgeable and effective. Identify and use exemplary school-based staff in addition to others.
- **Access to differentiated learning.** Differentiate professional learning according to each audience's skills, experience, and needs. Have professional learning and technical assistance continue for new personnel and those needing additional support.
- **Multiple formats.** Use multiple formats (e.g., videos, webinars, and narrative text) and presentation approaches (e.g., school-based, small groups). Continue to build out blended learning opportunities so that all staff can more easily access the content.
- **Exemplary implementation models**. Identify and share district-wide best practices that demonstrate high expectations and effective implementation to ensure they include students with IEPs, ELLs, students who are twice exceptional, etc. Encourage staff to visit exemplary schools and set aside time for that to happen.

Systems and Structures

21. Special Education Policy and Procedure Manual

- **Red Book**. Revise the existing Red Book into an interactive, web-based GPS special education manual to support user-friendly and transparent access to procedures/practices relevant to the management and operations of special education and to which school staff can be held accountable for implementing. Streamline resources so that school teams can easily access relevant information and use embedded hyperlinks to provide information for staff as needed. Update the manual on a routine basis. Include criteria, procedures, and practices for each area in the manual relevant to the implementation of these recommendations, e.g., criteria for child find; MTSS progress criteria to support the referral of students for special education evaluations; inclusive instruction; revised continuum of services; transportation protocol; etc.

22. Transparent Staffing Allocation Model

- **Current staff allocation analysis.** Conduct an in-depth analysis of staffing allocations to better understand how schools organize personnel (by grade, by subject, etc.) to provide services required in IEPs.
- **New allocation model.** Create a workgroup with representatives from school and central office leadership (including principals, representative special and general educators, related services personnel, and PPS and Finance personnel) to develop a new, transparent funding model and assess the extent to which current personnel are available to support the intended outcomes of effective service delivery and the continued enhancement of inclusive practices.
- **Communicate model, address gaps with current staff, and review annually.** Make the revised formula transparent and evaluate needed changes for the short and long term. Review on an annual basis.

23. Out of District Placement Student Data and Finances Monitoring

- **Monitor placements.** Develop a system to monitor out of district placements, including number of students placed, number of years each placed, GPS school from which student was placed, reason for placement (e.g., need for more intensive instruction, behavior, etc.), trigger for placement (e.g., IEP-driven decision, settlement agreement, litigation requirement, etc.), placement contracts, and finances. Review data trends monthly.
- **Assess placements.** Based on the data above, at least annually review trends and how GPS might reconfigure its human and material resources to provide PPTs better and more flexible in-district options for students and to give PPS leaders more options when considering settlement decisions and educational justifications for GPS placement to present during due process hearings.

Family and Community Engagement

24. Enact Report Recommendations

- **Implement and publicly report recommendation progress.** In order to build community trust, implement the recommendations in this report and publicly report at least twice per year on progress made or obstacles/delays encountered.

25. Family Friendly Guides

- **Parent information.** Collaborate with school personnel, principals, other school-based groups, and local parent and advocacy groups representatives to develop a parent manual, including information and resource links that would be useful for parents in understanding the IEP process. Supplement it with one-page brochures to further access to this information. Also, ensure the information is accessible to parents with diverse linguistic needs and sensory limitations.
- **Parent friendly training.** Plan face-to-face training and online modules to provide parents an understanding of the information in the manual. Ensure training is accessible to parents with diverse linguistic needs and sensory limitations.

26. Website

- **Content.** At least annually, review and update materials posted on the GPS website regarding special education instructional models, related services, and supplementary aids and services. Ensure this information is clearly accessible and comprehensive and accessible to parents with diverse linguistic needs and sensory limitations.

27. Parent Trainings

- **Parent training plan.** In consultation with representatives of parent support groups, develop a training plan for families in the areas of IEP process, role of the child study team, helpful hints for parents at home, and how families can take an active and collaborative role at IEP meetings.

28. Family Engagement Vision

- **Collaborative vision.** With representatives of parent support groups, preschool special education leaders who have earned high survey results in this area, as well as other GPS diverse representatives, have discussions about family engagement, specific to special education. Based on these discussions, create a core belief vision statement of agreed-upon ideals. Share it with other stakeholders to build family engagement support across the District.

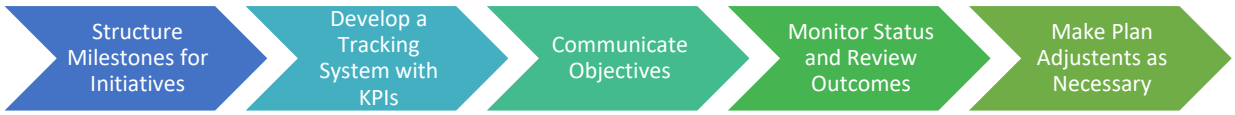
From Strategy to Execution

The secret to successful strategy execution is in translating strategies into actions. Further, tracking progress made on an organization's strategy execution is integral to understanding whether it will reach its desired future state. From our experience, the most challenging part of a comprehensive program evaluation for a school district is moving from the recommendations to a concrete action plan, then to a change in practice. These steps require significant focus, in addition to organization, communication, and collaboration across departments. Implementing change across often siloed and independent departments, with differing priorities and reporting structures, requires out of the box thinking and a commitment to approaching issues and solutions in a new light.

While there are different approaches that school districts take to managing this process, the most successful ones create a structure that is sustainable, with internal and external accountability measures and strong cross-departmental advocates. PCG recommends a five-step Strategy Execution process, which we have found results in grounded, sustainable change within an organization.

PCG recommends that GPS address each component of our *Strategy Execution Process* in order to position the District to make lasting and impactful changes.

Exhibit 83. PCG's Strategy Execution Process



Structure Milestones for Initiatives

Action plans must include concrete, measurable milestones that can be assessed on a regular basis. These milestones break down initiatives into manageable steps and timelines. This structure is essential, especially given the school year cycle and the urgency by which GPS would like to move these critical initiatives forward. At minimum, given the nature of the initiatives, progress toward milestones should be reviewed monthly through the 2021-22 and 2022-23 school years.

Develop a Tracking System with KPIs

Key Performance Indicators (KPIs) must be established for each measurable milestone. Reviewing these KPIs will help GPS assess where each initiative stands. By monitoring these KPIs frequently, GPS will be able to assess barriers and adjust plans early in the process if needed. It is often the case that defining metrics or KPIs is the step that allows teams to recognize challenges within the theory of action that undergirds their action plan.

Communicate the Objectives

To implement new policies and procedures, organizational changes, or new approaches, stakeholders need a solid grasp of the initiatives, the objectives, and the benefits the plan will bring to bear. Communicating progress made on each key initiative is equally important to ensuring continued support from those impacted by the changes, as well as the associated stakeholders.

Monitor Progress and Review Outcomes

Action plans are more likely to succeed when staff are deeply involved with the implementation process and there are standing monthly status checks on progress made toward established objectives. It is also critical at this point to celebrate real progress and hold individuals who have not “delivered” accountable.

Make Plan Adjustments as Necessary

An action plan is not an unchangeable document. It is a fluid plan that should be revised and updated as the GPS environment changes and grows. Openness to revising the action plans will enable GPS to adjust to shifting fiscal and regulatory realities as well as changing priorities. If GPS’s core leadership team sees progress on certain initiatives falling short of expectations, a reevaluation of the original objectives and approach may be needed. However, it is also important to assess the causes of discrepancies between actual and planned results.

APPENDIX

A. GPS Staffing Ratios Compared to Other Districts[128][129]

Ratios for Special Educator, Paraeducator, Speech/Lang, and Psychologist	State	Total Enrollment	Incidence		Special Educator			Paraeducator			Speech/Lang			Psychologist		
						Ratio To:			Ratio To:			Ratio To:			Ratio To:	
			% SpEd	SpEd Enr	Number	Sped	All	Number	Sped	All	Number	Sped	All	Number	Sped	All
Agawam Public Schools	MA	4,347	15.1%	656	39	16.8	111.5	100	6.6	43.5	15	43.7	289.8	3	218.7	1449.0
Alexandria City Public Schools	VA	15,105	11.6%	1,754	162	10.8	93.2	151	11.6	100.0	28	62.6	539.5	20	89.0	766.8
Anchorage School Dist	AK	48,154	14.1%	6,779	716.8	9.5	67.2	786.4	8.6	61.2	65	104.3	740.8	44.7	151.7	1077.3
Arlington Pub Sch	VA	26,975	14.1%	3,811	415.7	9.2	64.9	270	14.1	99.9	36.6	104.1	737.0	37.9	100.6	711.7
Atlanta Public Schools	GA	43,443	11.4%	4,950	431	11.5	100.8	224	22.1	193.9	65	76.2	668.4	22	225.0	1974.7
Austin Pub S D	TX	84,676	9.5%	8,062	772.5	10.4	109.6	824	9.8	102.8	70.5	114.4	1201.1	34.6	233.0	2447.3
Baltimore City Publ Sch	MD	82,824	15.5%	12,866	1,121	11.5	73.9	620	20.8	133.6	92	139.8	900.3	NA	NA	NA
Baltimore County P Sch	MD	107,033	11.3%	12,127	1025.4	11.8	104.4	2305	5.3	46.4	187.5	64.7	570.8	85.3	142.2	1254.8
Bellevue SD	WA	18,883	10.3%	1,947	82.7	23.5	228.3	118.6	16.4	159.2	17.4	111.9	1085.2	17.3	112.5	1091.5
Boston Public Schools	MA	54,966	21.0%	11,534	1200	9.6	45.8	800	14.4	68.7	147	78.5	373.9	48	240.3	1145.1
Bridgeport	CT	20,300	12.9%	2,618	204	12.8	99.5	254	10.3	79.9	25	104.7	812.0	33	79.3	615.2
Buffalo Public Schools	NY	46,583	16.6%	7,744	753	10.3	61.9	439	17.6	106.1	109	71.0	427.4	62	124.9	751.3
Cambridge Publ Schools	MA	6,000	20.0%	1,200	176	6.8	34.1	103	11.7	58.3	20	60.0	300.0	22	54.5	272.7
Carpentersville	IL	19,844	15.8%	3,139	227	13.8	87.4	380	8.3	52.2	43	73.0	461.5	28	112.1	708.7
Chicago Public Schools	IL	397,092	13.7%	54,376	4,649	11.7	85.4	4,228	12.9	93.9	390	139.4	1018.2	261	208.3	1521.4
Cincinnati Pub Schools	OH	51,431	17.4%	8,928	457	19.5	112.5	801	11.1	64.2	62	144.0	829.5	57.7	154.7	891.4
Clark Cty School Dist	NV	309,476	10.4%	32,167	2,247	14.3	137.7	1,346	23.9	229.9	299	107.6	1035.0	180	178.7	1719.3
Cleve Hts-UnivHtsCty	OH	6,000	18.3%	1,100	83	13.3	72.3	58	19.0	103.4	7	157.1	857.1	8	137.5	750.0
Compton Unified SD	CA	26,703	11.2%	2,981	126	23.7	211.9	118	25.3	226.3	5	596.2	5340.6	14	212.9	1907.4
D.C. Public Schools	D.C	48,991	17.6%	8,603	669	12.9	73.2	653	13.2	75.0	90	95.6	544.3	78	110.3	628.1
Davenport Comm Sch	IA	15,302	12.1%	1,857	188	9.9	81.4	287	6.5	53.3	NA	NA	NA	NA	NA	NA
Deer Valley Unified SD	AZ	36,086	9.1%	3,289	190	17.3	189.9	229	14.4	157.6	49	67.1	736.4	108	30.5	334.1
DeKalb 428	IL	6,249	14.1%	879	58	15.2	107.7	205	4.3	30.5	9	97.7	694.3	7.5	117.2	833.2
Denver Public Schools	CO	78,352	11.7%	9,142	592	15.4	132.4	528	17.3	148.4	94	97.3	833.5	98	93.3	799.5
DesMoines Public Schls	IA	31,654	15.3%	4,854	493	9.8	64.2	358.5	13.5	88.3	37.3	130.1	848.6	11.5	422.1	2752.5
Elgin U-46	IL	40,525	13.1%	5,304	252.8	21.0	160.3	288.5	18.4	140.5	71.9	73.8	563.6	20	265.2	2026.3
ESD 112	WA	13,764	14.4%	1,987	55	36.1	250.3	158	12.6	87.1	20	99.4	688.2	12	165.6	1147.0
Everett Pub Schools	WA	6,100	17.2%	1,049	74	14.2	82.4	51	20.6	119.6	4	262.3	1525.0	5	209.8	1220.0
Fort Worth	TX	79,885	7.7%	6,144	520	11.8	153.6	450	13.7	177.5	73	84.2	1094.3	31	198.2	2576.9
Greenville County	SC	70,282	14.1%	9,894	463	21.4	151.8	376	26.3	186.9	93	106.4	755.7	25	395.8	2811.3
Greenwich	CT	9,048	12.4%	1,124	125	9.0	72.4	142	7.9	63.7	26	43.2	348.0	30	37.5	301.6
Houston Indepen SD	TX	200,568	8.7%	17,489	1,625	10.8	123.4	1,145	15.3	175.2	158	110.7	1269.4	NA	NA	NA
Kalamazoo Pub Schools	MI	12,100	13.8%	1,667	70	23.8	172.9	79	21.1	153.2	15	111.1	806.7	NA	NA	NA
Kent Pub Schools	WA	27,196	11.3%	3,069	148.7	20.6	182.9	318	9.7	85.5	32.3	95.0	842.0	25	122.8	1087.8
Kyrene School District	AZ	17,910	8.6%	1,544	141	11.0	127.0	124	12.5	144.4	27	57.2	663.3	14	110.3	1279.3
Lake Washington	WA	26,864	11.7%	3,145	155.1	20.3	173.2	241.5	13.0	111.2	32.6	96.5	824.0	24.7	127.3	1087.6
Lakota Local	OH	18,500	9.7%	1,800	126	14.3	146.8	120	15.0	154.2	39	46.2	474.4	18	100.0	1027.8
LAUSD	CA	521,880	12.7%	66,236	5,331	12.4	97.9	6,466	10.2	80.7	496	133.4	1051.2	514	129.0	1016.3
Lincoln	NE	1,060	12.1%	128	21	6.1	50.5	21	6.1	50.5	5	25.6	212.0	2	64.0	530.0
Madison Pub Schls	WI	27,185	14.0%	3,808	347	11.0	78.3	448	8.5	60.7	86	44.3	316.1	49	77.7	554.8
Marlborough Pub Sch	NJ	4,835	24.8%	1,198	141	8.5	34.3	115	10.4	42.0	7	171.1	690.7	4	299.5	1208.8
Memphis City	TN	110,863	15.0%	16,637	912	18.2	121.6	655	25.4	169.3	53	313.9	2091.8	58	286.8	1911.4
Miami-Dade	FL	376,264	10.6%	40,012	2,500	16.0	150.5	1,226	32.6	306.9	209	191.4	1800.3	206	194.2	1826.5
Milwaukee	WI	78,533	20.9%	16,406	1281	12.8	61.3	988	16.6	79.5	169	97.1	464.7	136	120.6	577.4
Montgomery Cty Sch	AL	146,812	11.7%	17,226	1,588	10.8	92.5	1,398	12.3	105.0	293	58.8	501.1	97	177.6	1513.5
N. Chicago (in Dist.)	IL	3,803	16.1%	614	39	15.7	97.5	27	22.7	140.9	8	76.8	475.4	5	122.8	760.6
Naperville 203	IL	17982	11.0%	1,978	150	13.2	119.9	237	8.3	75.9	33	59.9	544.9	22	89.9	817.4
New Bedford	MA	12,692	20.9%	2,655	204	13.0	62.2	205	13.0	61.9	26	102.1	488.2	9	295.0	1410.2
Northern Valley RHSD	NJ	2,303	17.8%	410	28	14.6	82.3	30	13.7	76.8	1	410.0	2303.0	3	136.7	767.7
Oak Park Sch Dist 97	IL	5,400	16.2%	875	78	11.2	69.2	90	9.7	60.0	14	62.5	385.7	8	109.4	675.0
Oakland Unified SD	CA	33,312	16.2%	5,401	404	13.4	82.5	175	30.9	190.4	47	114.9	708.8	43.5	124.2	765.8
Pittsburgh Pub Schools	PA	28,000	18.2%	5,096	359	14.2	78.0	252	20.2	111.1	40	127.4	700.0	16	318.5	1750.0
Portland Public Schools	OR	46,596	14.0%	6,513	355	18.3	131.3	535	12.2	87.1	92	70.8	506.5	56	116.3	832.1
Prince William County Schools	VA	90,930	10.1%	9,148	774	11.8	117.5	362	25.3	251.2	67	136.5	1357.2	32	285.9	2841.6
Providence	RI	23,695	18.8%	4,460	340	13.1	69.7	339	13.2	69.9	40	111.5	592.4	28	159.3	846.3
Renton	WA	14,343	14.7%	2,108	129	16.3	111.2	294	7.2	48.8	20	105.4	717.2	15	140.5	956.2
Rockford PS	IL	28,973	14.0%	4,065	336	12.1	86.2	334	12.2	86.7	49	83.0	591.3	24	169.4	1207.2
Round Rock	TX	43,000	7.7%	3,313	369	9.0	116.5	171	19.4	251.5	41	80.8	1048.8	29	114.2	1482.8
San Diego Unified SD	CA	132,500	12.3%	16,300	1,100	14.8	120.5	1,300	12.5	101.9	196	83.2	676.0	129	126.4	1027.1
Saugus	MA	3,012	15.3%	462	28	16.5	107.6	29	15.9	103.9	6	77.0	502.0	NA	NA	NA
Sch Dist of Philadelphia	PA	168,181	20.0%	33,686	1,535	21.9	109.6	610	55.2	275.7	99	340.3	1698.8	100	336.9	1681.8
Scottsdale	AZ	26,544	10.9%	2,891	246	11.8	107.9	230	12.6	115.4	39.4	73.4	673.7	28.4	101.8	934.6
Shelby County (Memphis)	TN	114760	12.7%	14,556	852	17.1	134.7	768	19.0	149.4	55	264.7	2086.5	60	242.6	1912.7
St. Paul	MN	38,086	18.8%	7,152	523	13.7	72.8	536	13.3	71.1	97	73.7	392.6	19	376.4	2004.5
Sun Prairie Area S Dist	WI	6,656	10.5%	697	62	11.2	107.4	93	7.5	71.6	14	49.8	475.4	7	99.6	950.9
Tacoma Pub Schl	WA	32,412	12.0%	3,894	172.5	22.6	187.9	223	17.5	145.3	33.6	115.9	964.6	27	144.2	1200.4
Tucson Unified SD	AZ	56,000	14.5%	8,092	409	19.8	136.9	419	19.3	133.7	61	132.7	918.0	54	149.9	1037.0
Washoe County Dist	NV	63,310	13.5%	8,551	472	18.1	134.1	325	26.3	194.8	77	111.1	822.2	37	231.1	1711.1
West Aurora SD	IL	12,725	13.3%	1,688	120	14.1	106.0	101	16.7	126.0	21	80.4	606.0	13	129.8	978.8
Williamson Cty Schl	TN	31,292	9.0%	2,824	213	13.3	146.9	400	7.1	78.2	34	83.1	920.4	23	122.8	1360.5
Worcester	MA	24,825	20.8%	5,172	254	20.4	97.7	366	14.1	67.8	38	136.1	653.3	NA	NA	NA
Averages			14%			14.5	110.3		15.4	115.7		117.5	866.2		167.3	1,231.1

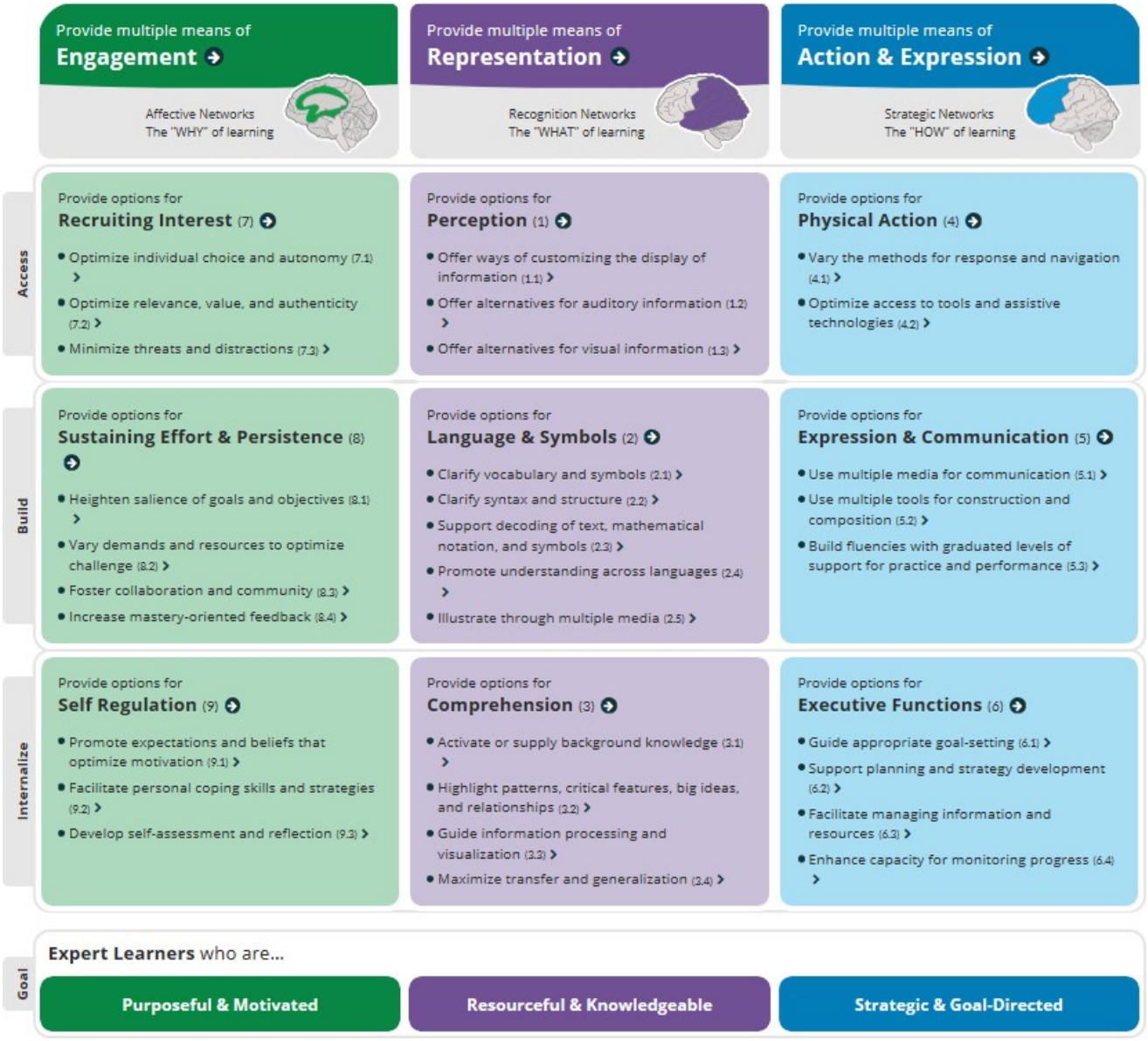
[128] Sue Gamm, Esq. compiled and continues to maintain this list. She grants PCG permission to use the data in reports.
[129] Districts collect and report data using different methods and different points of time, therefore student headcounts and staffing totals may vary.

Ratios for Social Workers, Nurses, OTs & PTs	State	Total Student Enrollment	Total Special Ed	Social Worker			Nursing (School/RN, etc.)			Occupational Therapy		Physical Therapy	
				Number	Ratio To:		Number	Ratio To:		Number	Ratio	Number	Ratio
					SpEd	All		SpEd	All		SpEd		SpEd
Agawam Public Schools	MA	4,347	656	NA	NA	NA	8	82.0	543.4	3	218.7	3	218.7
Alexandria City Public Schools	VA	15,105	1,754	24	73.1	629.4	19	92.3	795.0	4	438.5	1.5	1,169.3
Anchorage School Dist	AK	43,443	4,950	30	**165.0**	1,448.1	58	85.3	749.0	12	412.5	3	1,650.0
Arlington Pub Sch	VA	43,443	4,950	32.3	**153.3**	1,345.0	NA	NA	NA	24.4	202.9	5.8	853.4
Atlanta Public Schools	GA	48,154	6,779	NA	**NA**	**NA**	112.8	60.1	426.9	21.9	309.5	7.8	869.1
Austin Pub S D	TX	84,676	8,062	21	**383.9**	4,032.2	68	118.6	1,245.2	19	424.3	13	620.2
Baltimore City Publ Sch	MD	82,824	12,866	193	**66.7**	429.1	78	164.9	1,061.8	20	643.3	5	2,573.2
Baltimore County P Sch	MD	107,033	12,127	48.7	**249.0**	2,197.8	179.8	67.4	595.3	65.2	186.0	27	449.1
Bellevue SD	WA	54,966	11534	NA	**NA**	NA	100	115.3	549.7	67	172.1	17	678.5
Boston Public Schools	MA	18,883	1,947	4	**486.8**	4,720.8	13.2	147.5	1,430.5	5.3	367.4	5.3	367.4
Bridgeport	CT	20,300	2,618	38	**68.9**	534.2	28	93.5	725.0	7	374.0	2	1,309.0
Buffalo Public Schools	NY	46,583	7744	48.5	**159.7**	960.5	NA	NA	NA	75	103.3	29	267.0
Cambridge Publ Schools	MA	6,000	1,200	16	**75.0**	375.0	0	NA	NA	16	75.0	7	171.4
Carpentersville	IL	19,844	3,139	36.5	**86.0**	543.7	27.5	114.1	721.6	22	142.7	6	523.2
Chicago Public Schools	IL	404,151	50,566	355.7	**142.2**	1,136.2	334	151.4	1,210.0	115	439.7	35	1,444.7
Cincinnati Pub Schools	OH	51,431	**8,928**	NA	**NA**	NA	NA	NA	NA	19	469.9	5	1,785.6
Clark Cty School Dist	NV	309,476	32,167	NA	**NA**	NA	173	185.9	1,788.9	68	473.0	29	1,109.2
Cleve Hts-UnivHtsCty	OH	6,000	1,100	7	**157.1**	857.1	5	220.0	1,200.0	2	550.0	1	1,100.0
Compton Unified SD	CA	26,703	2981	1	**2981.0**	26,703.0	1	2981.0	26,703.0	1.5	1,987.3	0.5	5,962.0
D.C. Public Schools	D.C	48,991	8,603	90	**95.6**	544.3	127	67.7	385.8	48	179.2	16	537.7
Davenport Comm Sch	IA	15,302	1,857	NA	**NA**	NA	7	265.3	2,186.0	NA	NA	NA	NA
Deer Valley Unified SD	AZ	36,086	3,289	NA	**NA**	NA	37	88.9	975.3	19	173.1	4	822.3
DeKalb 428	IL	6,249	879	8	**109.9**	781.1	7	125.6	892.7	3.4	258.5	1.3	676.2
Denver Public Schools	CO	78,352	9,142	74	**123.5**	1,058.8	77	118.7	1,017.6	25	365.7	12	761.8
DesMoines Public Schls	IA	31,654	4,854	25.8	**188.1**	1,226.9	58.4	83.1	542.0	7	693.4	4.8	1,011.3
Elgin U-46	IL	13,764	1,987	NA	**NA**	NA	5	397.4	2,752.8	6	331.2	3	662.3
ESD 112	WA	40,525	5,304	56	**94.7**	723.7	59.5	89.1	681.1	25.2	210.5	4	1,326.0
Everett Pub Schools	WA	6,100	1,049	2	**524.5**	3,050.0	11	95.4	554.5	2	524.5	3	349.7
Fort Worth	TX	79,885	6,144	NA	**NA**	NA	106	58.0	753.6	16	384.0	10	614.4
Greenville County	SC	70,282	9,894	20	**494.7**	3,514.1	132	75.0	532.4	14	706.7	4	2,473.5
Greenwich	CT	9,048	1,124	15	**74.9**	603.2	23	48.9	393.4	1	1,124.0	NA	NA
Houston Indepen SD	TX	200,568	17,489	26	**672.7**	7,714.2	25	699.6	8,022.7	17	1,028.8	8	2,186.1
Kalamazoo Pub Schools	MI	12,100	1,667	5	**333.4**	2,420.0	2	833.5	6,050.0	4	416.8	3	555.7
Kent Pub Schools	WA	27,196	3069	2.2	**1395.0**	12,361.8	NA	NA	NA	12.8	239.8	4.8	639.4
Kyrene School District	AZ	26864	3145	NA	**NA**	NA	23.6	133.3	1,138.3	19.3	163.0	3.3	953.0
Lake Washington	WA	17,910	1,544	NA	**NA**	NA	4	386.0	4,477.5	2	772.0	2	772.0
Lakota Local	OH	18,500	1,800	6	**300.0**	3,083.3	14	128.6	1,321.4	8	225.0	2	900.0
LAUSD	CA	521,880	66,236	94	**704.7**	5,552.5	164	402.9	3,174.3	250	264.8	45	1,487.1
Lincoln	NE	1,060	128	5	**25.6**	212.0	2	64.0	530.0	2	64.0	1	128.0
Madison Pub Schls	WI	27,185	3,808	68	**56.0**	399.8	38	100.2	715.4	34	112.0	13	292.9
Marlborough Pub Sch	NJ	4,835	1,198	9	**133.1**	537.2	10	119.8	483.5	4	299.5	2	599.0
Memphis City	TN	110,863	16,637	55	**302.5**	2,015.7	68	244.7	1,630.3	11	1,512.5	9	1,848.6
Miami-Dade	FL	376,264	40,012	NA	**NA**	NA	206	194.2	1,826.5	65	615.6	23	1,739.7
Milwaukee	WI	146,812	17,226	NA	**NA**	NA	NA	NA	NA	112	153.8	61	282.4
Montgomery Cty Sch	AL	78533	16,406	140	**117.2**	561.0	101	162.4	777.6	30	546.9	13	1,262.0
N. Chicago (in Dist.)	IL	5,400	875	12	**72.9**	450.0	8	109.4	675.0	7	125.0	1	875.0
Naperville 203	IL	17982	1978	27	**73.3**	666.0	29	68.2	620.1	4	494.5	3	659.3
New Bedford	MA	12,692	2,655	67	**39.6**	189.4	30	88.5	423.1	11	241.4	3	885.0
Northern Valley RHSD	NJ	2,303	410	3.7	**110.8**	622.4	3	136.7	767.7	NA	NA	NA	NA
Oak Park Sch Dist 97	IL	3,803	614	10	**61.4**	380.3	NA	NA	NA	3.6	170.6	1.6	383.8
Oakland Unified SD	CA	28,000	5,096	NA	**NA**	NA	NA	NA	NA	NA	NA	NA	NA
Pittsburgh Pub Schools	PA	33,312	5315	19	**279.7**	1,753.3	30.8	172.6	1,081.6	12	442.9	2	2,657.5
Portland Public Schools	OR	46,596	6,513	10	**651.3**	4,659.6	NA	NA	NA	20	325.7	9	723.7
Prince William County Schools	VA	90,930	9,148	4	**2287.0**	22,732.5	NA	NA	NA	22	415.8	9	1,016.4
Providence	RI	23,695	4460	35	**127.4**	677.0	NA	NA	NA	11.5	387.8	4.5	991.1
Renton	WA	14,343	2,108	0	**NA**	NA	17	124.0	843.7	15	140.5	3	702.7
Rockford Pub S	IL	28,973	4,065	26	**156.3**	1,114.3	32	127.0	905.4	12.5	325.2	4.5	903.3
Round Rock	TX	43,000	3,313	NA	**NA**	NA	1	3313.0	43,000.0	10	331.3	3	1,104.3
San Diego Unified SD	CA	132,500	16,300	NA	**NA**	NA	129	126.4	1,027.1	40	407.5	10	1,630.0
Saugus	MA	3,012	462	4	**115.5**	753.0	5	92.4	602.4	2	231.0	1	462.0
Sch Dist of Philadelphia	PA	168,181	33,686	NA	**NA**	NA	280	120.3	600.6	20	1,684.3	20	1,684.3
Scottsdale	AZ	26,544	2,891	NA	**NA**	NA	31	93.3	856.3	13.8	209.5	3.8	760.8
Shelby County (Memphis)	TN	**114760**	**14556**	**66**	**220.5**	1,738.8	**79**	184.3	1,452.7	**29.22**	498.2	**12.84**	1,133.6
St. Paul	MN	38,086	7,152	92	**77.7**	414.0	33	216.7	1,154.1	36	198.7	12	596.0
Sun Prairie Area S Dist	WI	6,656	697	8	**87.1**	832.0	1	697.0	6,656.0	5	139.4	2	348.5
Tacoma Pub Schl	WA	32,412	3,894	NA	**NA**	NA	1.2	3245.0	27,010.0	19	204.9	11	354.0
Tucson Unified SD	AZ	56,000	8,092	26	**311.2**	2,153.8	53	152.7	1,056.6	10	809.2	4	2,023.0
Washoe County Dist	NV	63,310	8,551	NA	**NA**	NA	35	244.3	1,808.9	12	712.6	7	1,221.6
West Aurora SD	IL	30,942	4,093	NA	**NA**	NA	37	110.6	836.3	22	186.0	5	818.6
Williamson Cty Schl	TN	12,725	1688	19	**88.8**	669.7	7	241.1	1,817.9	11	153.5	7	241.1
Worcester	MA	24,825	5,172	NA	**NA**	NA	NA	NA	NA	12	431.0	5	1,034.4
Averages					327.5	2,751.6		327.5	2,962.0		420.2		1,033.0

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

Rank	% IEPs	Special Educators	Paraeducators	Speech/Lang Pathologists	Psychologists	Social Workers	Nurses	Occupational Therapists	Physical Therapists
1	7.7%	6.1	4.3	25.6	30.5	25.6	**48.9**	64.0	128.0
2	7.7%	6.8	5.3	**43.2**	**37.5**	39.6	58.0	75.0	171.4
3	8.6%	8.5	6.1	43.7	54.5	56.0	60.1	103.3	218.7
4	8.7%	9.0	6.5	44.3	64.0	61.4	64.0	112.0	241.1
5	9.0%	**9.0**	6.6	46.2	77.7	66.7	67.4	125.0	267.0
6	9.1%	9.2	7.1	49.8	79.3	68.9	67.7	139.4	282.4
7	9.5%	9.5	7.2	57.2	89.0	72.9	68.2	140.5	292.9
8	9.7%	9.6	7.5	58.8	89.9	73.1	75.0	142.7	348.5
9	10.1%	9.8	**7.9**	59.9	93.3	73.3	82.0	153.5	349.7
10	10.3%	9.9	8.3	60.0	99.6	**74.9**	83.1	153.8	354.0
11	10.4%	10.3	8.3	62.5	100.0	75.0	85.3	156.2	367.4
12	10.5%	10.4	8.5	62.6	100.6	77.7	88.5	163.0	383.8
13	10.6%	10.8	8.6	64.7	101.8	86.0	88.9	170.6	449.1
14	10.9%	10.8	9.7	67.1	109.4	87.1	89.1	172.1	462.0
15	11.0%	10.8	9.7	70.8	110.3	88.8	92.3	173.1	523.2
16	11.2%	11.0	9.8	71.0	110.3	94.7	92.4	179.2	537.7
17	11.3%	11.0	10.2	73.0	112.1	95.6	93.3	186.0	555.7
18	11.3%	11.2	10.3	73.4	112.5	109.9	93.5	186.0	596.0
19	11.4%	11.2	10.4	73.7	114.2	110.8	95.4	198.7	599.0
20	11.6%	11.5	11.1	73.8	116.3	115.5	100.2	204.9	614.4
21	11.7%	11.5	11.6	76.2	117.2	117.2	109.4	209.5	620.2
22	11.7%	11.7	11.7	76.8	120.6	118.0	110.6	210.5	639.4
23	11.7%	11.8	12.2	77.0	122.8	123.5	114.1	218.7	657.1
24	12.0%	11.8	12.2	78.5	122.8	127.4	115.3	225.0	659.3
25	12.1%	11.8	12.3	80.4	122.8	133.1	118.6	231.0	662.3
26	12.1%	11.8	12.5	80.8	124.2	142.2	118.7	239.8	676.2
27	12.3%	12.1	12.5	83.0	124.9	156.3	119.8	241.4	678.5
28	12.4%	12.4	12.6	83.1	126.4	157.1	120.3	258.5	702.7
29	12.7%	12.8	12.6	83.2	127.3	159.7	124.0	264.8	723.7
30	12.7%	12.8	12.9	84.2	129.0	165.0	125.6	299.5	760.8
31	12.9%	12.9	13.0	95.0	129.8	188.1	126.4	309.5	761.8
32	13.1%	13.0	13.0	95.6	136.7	220.5	127.0	325.2	772.0
33	13.3%	13.1	13.2	96.5	137.5	249.0	128.6	325.7	818.6
34	13.5%	13.2	13.2	97.1	140.5	279.7	133.3	331.2	822.3
35	13.7%	13.3	13.3	97.3	142.2	300.0	136.7	331.3	869.1
36	13.8%	13.3	13.5	97.7	144.2	302.5	147.5	365.7	875.0
37	14.0%	13.4	13.7	99.4	149.9	311.2	151.4	367.4	885.0
38	14.0%	13.7	13.7	102.1	151.7	333.4	152.7	374.0	900.0
39	14.0%	13.8	14.1	104.1	154.7	383.9	162.4	384.0	903.3
40	14.1%	14.1	14.1	104.3	159.3	486.8	164.9	387.8	953.0
41	14.1%	14.2	14.4	104.7	165.6	494.7	172.6	407.5	991.1
42	14.1%	14.2	14.4	105.4	169.4	524.5	184.3	412.5	1,011.3
43	14.1%	14.3	15.0	106.4	177.6	651.3	185.9	415.8	1,016.4
44	14.4%	14.3	15.3	107.6	178.7	672.7	194.2	416.8	1,034.4
45	14.5%	14.6	15.9	110.7	194.2	704.7	216.7	424.3	1,100.0
46	14.7%	14.8	16.4	111.1	198.2	1,395.0	220.0	431.0	1,104.3
47	15.0%	15.2	16.6	111.1	208.3	2,287.0	241.1	438.5	1,109.2
48	15.1%	15.4	16.7	111.5	209.8	2,981.0	244.3	439.7	1,133.6
49	15.3%	15.7	17.3	111.9	212.9	NA	244.7	442.9	1,169.3
50	15.3%	16.0	17.5	114.4	218.7	NA	265.3	469.9	1,221.6
51	15.5%	16.3	17.6	114.9	225.0	NA	386.0	473.0	1,262.0
52	15.8%	16.5	18.4	115.9	231.1	NA	397.4	494.5	1,309.0
53	16.1%	16.8	19.0	127.4	233.0	NA	402.9	498.2	1,326.0
54	16.2%	17.1	19.0	130.1	240.3	NA	697.0	524.5	1,444.7
55	16.2%	17.3	19.3	132.7	242.6	NA	699.6	546.9	1,487.1
56	16.6%	18.1	19.4	133.4	265.2	NA	833.5	550.0	1,630.0
57	17.2%	18.2	20.2	136.1	285.9	NA	2,981.0	615.6	1,650.0
58	17.4%	18.3	20.6	136.5	286.8	NA	3,245.0	643.3	1,684.3
59	17.6%	19.5	20.8	139.4	295.0	NA	3,313.0	693.4	1,739.7
60	17.8%	19.8	21.1	139.8	299.5	NA	NA	706.7	1,785.6
61	18.2%	20.3	22.1	144.0	318.5	NA	NA	712.6	1,848.6
62	18.3%	20.4	22.7	157.1	336.9	NA	NA	772.0	2,023.0
63	18.8%	20.6	23.9	171.1	376.4	NA	NA	809.2	2,186.1
64	18.8%	21.0	25.3	191.4	395.8	NA	NA	1,028.8	2,473.5
65	20.0%	21.4	25.3	262.3	422.1	NA	NA	**1,124.0**	2,573.2
66	20.0%	21.9	25.4	264.7	NA	NA	NA	1,512.5	2,657.5
67	20.8%	22.6	26.3	313.9	NA	NA	NA	1,684.3	5,962.0
68	20.9%	23.5	26.3	340.3	NA	NA	NA	1,987.3	**NA**
69	20.9%	23.7	30.9	410.0	NA	NA	NA	NA	NA
70	21.0%	23.8	32.6	596.2	NA	NA	NA	NA	NA
71	24.8%	36.1	55.2	NA	NA	NA	NA	NA	NA
Avg.	**14.0%**	**14.5**	**15.4**	**117.5**	**167.3**	**327.5**	**327.5**	**420.2**	**1033.0**

B. Universal Design for Learning Principles[130]



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

C. PCG Team

Matthew Korobkin, Project Leader and Special Education Subject Matter Expert

Matthew Korobkin, a Senior Advisor for Special Education Services, brings strategic planning expertise at the state and district level in the areas of special education policy, compliance, operations, and instructional practice. Currently, Matthew focuses on supporting our national efforts in this field; performing special education program reviews as well as targeted reviews throughout the country; and working with other subject matter experts on thought leadership development.

Prior to joining PCG, Matthew was the Special Education Officer for Strategic Planning and Evaluation in the Office of the Secretary of Education at the Delaware Department of Education. As a direct report to the Secretary of Education, Matthew advised a legislated Special Education Oversight Group comprised of the Governor, Co-Chairs of the General Assembly's Joint Finance Committee, and cabinet secretaries from the Department of Education, Department of Health and Social Services, and the Department of Services for Children, Youth, and their Families. Matthew has a Master of Science in Education degree from the University of Pennsylvania and a Bachelor of Arts degree in Industrial and Labor Relations from Cornell University.

Dr. Jennifer Meller, Project Sponsor and Special Education Subject Matter Expert

Dr. Jennifer Meller, an Associate Solutions Manager with PCG, leads the firm's efforts in providing districts with comprehensive special education program evaluations and technical assistance in the areas of staffing, stakeholder engagement, compliance, finance, data use, and best instructional practices for students with disabilities. For over 20 years, she has worked extensively with states, districts, schools, and teachers on projects related to special education and inclusive education policy. Jennifer's experience is built upon her practitioner-oriented background and education policy work in states across the US, including Arizona, California, Colorado, Connecticut, the District of Columbia, Georgia, Illinois, Maryland, Massachusetts, New Jersey, Pennsylvania, Texas, Virginia, and Washington. She also assists districts in several states with implementing procedurally compliant based special education technology systems and has designed and administered PCG's national survey on the use of IEP systems. Jennifer served as the project manager for the Bill & Melinda Gates Foundation on a data focused research engagement while at PCG and has managed a variety of projects for school districts that involve community and stakeholder engagement, data management and analysis, and process improvement.

Prior to joining PCG, Jennifer worked in the School District of Philadelphia as a Special Projects Manager in the Office of Management and Budget, and Director of Operations in the Office of Specialized Instructional Services. In these roles, she focused on building programs that supported students' social and emotional growth, implemented student-focused data management systems, supervised federal and state reporting, and oversaw several multi-million dollar federal grants. As part of this work, she led a team that provided technical assistance to more than 250 district and 70 charter schools in the Philadelphia area and managed over $200 million in local and grant funding. The Pennsylvania Department of Education's Bureau of Special Education recognized her team's efforts with a written commendation; the team also received recognition from other urban school districts. Jennifer previously served as a business development manager for Dale Carnegie Training, where she was responsible for creating a product line for children and teenagers. As part of this work, she taught public speaking and self-improvement courses for all ages. Dr. Meller earned an Ed.D. in Educational and Organizational Leadership and an MS.Ed. in Higher Education Management, both from the University of Pennsylvania. She received a B.A. in English from Dickinson College.

Dr. Jerry Petroff, Advisor

Dr. Jerry Petroff serves as an advisor to PCG with a focus on classroom observations, instruction, and supports for special education teachers. He is a Professor of Special Education, Language, and Literacy at The College of New Jersey (TCNJ) School of Education, Ewing, NJ. Dr. Petroff is also the Executive Director of the Center on Sensory and Complex Disabilities at TCNJ. In addition, Dr. Petroff is coauthor of *Assistive Technology in the Classroom: Enhancing the School Experiences of Students with Disabilities* – 2nd Edition (2012), Pearson. Dr. Petroff received a Ph.D. from Temple University in Psychological Studies in Special Education. He received a B.A. and M.A. from The College of New Jersey.

Matthew Scott, Project Manager

Matthew provides project support and coordination for a wide range of PCG Education clients. Mr. Scott brings 10 years of education management experience specializing in accreditation, strategic planning, program quality review, learning assessment processes, and education policy. Prior to joining PCG, Matthew spent 7 years as the Director of Institutional Effectiveness, Accreditation, and Regulatory Affairs for a specialized graduate school. In this capacity, he oversaw a portfolio of strategic growth and regulatory initiatives, including an initial institutional accreditation effort, new program development, enrollment management, and state approval processes. He began his career as a student advisor and leadership development professional for the University of the Pacific. He earned a M.A in Educational Administration and Leadership from the University of the Pacific, and a B.A. in Political Science from California State University, Long Beach

Solutions that Matter