2019

Special Education Review

for the Clear Creek Independent School District

Contents

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I. Introduction

In August 2018, Clear Creek ISD (CCISD/the District) contracted with Gibson Consulting Group (Gibson) to conduct a comprehensive review of the District's special education programs and services. This introduction provides an overview of the project scope and objectives, a description of Gibson's approach and methodology, and a summary of CCISD's special education program strengths and recommendations for improvement.

The Gibson review team wishes to thank CCISD leadership, staff, and parents for their assistance in conducting this review.

Executive Summary

Located in League City, a suburb just outside of Houston Texas, CCISD is the 28th largest school district in the state, educating just over 42,000 students ages 3 through 21 years old in 26 elementary schools, 10 intermediate schools, 1 secondary disciplinary alternative education program (Grades 6-12), 5 comprehensive high schools, 1 early college high school, and 1 alternative high school. Student enrollment over the past six years has increased by a modest 5.2 percent, while special education student enrollment has grown at a much faster rate, increasing 15.9 percent over this same time period. At the time of this review, 4,502 special education students account for 10.7 percent of CCISD's student population.

CCISD is recognized as one of the top performing school districts in the state – the percentage of students approaching grade level or above on the State of Texas Assessments of Academic Readiness (STAAR) exceeds both the state and regional averages in every subject and grade level. Special education student passing rates on the STAAR 3-8 assessments are steadily improving, but are still below the state's target in every subject. For context, most districts are also well below the State's target for special education. On the STAAR End of Course assessments, special education student performance has improved significantly, and passing rates exceed state targets in every subject except English Language Arts. Student performance on the STAAR Alternate 2 assessments compares favorably to benchmark districts in all subjects.

Over the course of this special education review, Gibson identified many program strengths as well as opportunities for improvement:

- The District has significantly increased student placements in inclusionary instructional arrangements, consistent with best practice.

- The Special Education program is staffed efficiently, has more special education teachers than paraprofessionals, and is very strategic in how paraprofessionals are used to support students. On a per student basis, special education program spending is second lowest among the 7 benchmark districts selected for comparison.

- The Special Services Department is logically organized to support accountability, and has reasonable spans of control.

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- Special education student achievement is improving but is still behind state targets in some areas.

- Most parents surveyed are satisfied with the quality of the District's special education services, but there are pockets of dissatisfaction that need to be addressed. Further, the level of satisfaction varies significantly among school types and individual schools of the same type. The District recently established a parent advisory committee to help address these concerns.

- Response to Intervention (RtI), the District's pre-referral intervention strategy, is not implemented consistently nor with fidelity across the District evidenced by a wide variation in the number of non-qualifying special education referral rates across campuses.

- Special education professional development opportunities are numerous, but not enough are required or address specific needs.

- The District has some potential compliance risks related to the disproportionate representation of some subgroups in special education and in discretionary disciplinary placements.

The findings above led to the following 27 recommendations for improvement, which are presented in Table 1-1 (in the order they appear in the report).

Table 1-1. CCISD Special Education Program Recommendations for Improvement

No.	Recommendation
1	Upgrade the Coordinator of Early Learning/PPCD to a Director of Early Learning/PPCD position.
2	Review and update all job descriptions to ensure that they accurately reflect assigned roles, responsibilities, reporting relationships, and position qualifications.
3	Ensure Licensed Specialists' in School Psychology total compensation (salaries and benefits) is competitive and explore other strategies to more effectively attract and retain staff.
4	Increase Medicaid reimbursements by obtaining blocked billing reports from MSB and pursuing physician referrals for eligible students and services.
5	Monitor and utilize special education outcomes data to ensure adequate academic and behavioral progress is being made by all students with disabilities.
6	Incorporate Campus Support Plans into each campuses' school improvement plan.
7	Ensure classroom walkthroughs are focused on specific District and/or campus improvement efforts.
8	Set expectations for both general education and special education staff to participate in joint learning walks to improve instructional practices across all classrooms within schools.
9	Actively track and monitor disproportionality data to determine the efficacy of current approaches.
10	Routinely track and monitor RtI data to identify campuses that require additional support.
11	Require the use of the Extended School Year Services Consideration and Decision-Making Guide by Admission, Review, and Dismissal committees.
12	Use more advanced assistive technology devices to better support student needs.
13	Reinforce the connection between Present Levels of Academic and Functional Performance statements and IEP goals through more targeted professional development.
14	Prioritize accommodations provided to students with disabilities and limit them to a few that are critical and manageable to ensure that they are consistently implemented and their impact can be measured.

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No.	Recommendation
15	Ensure that all students whose behavior interferes with their learning have a Behavior Intervention Plan.
16	Provide access to training to general educators in high-yield strategies for students with disabilities.
17	Ensure special education teachers have more opportunities to participate in professional learning communities and other professional development with content area teachers.
18	Accelerate the use of digital teaching and learning to differentiate instruction and personalize learning for students with disabilities.
19	Set expectations for transition ARDs to ensure students with disabilities and their parents are not negatively impacted when the student changes campuses.
20	Implement effective strategies to address the disproportionate number of special education students in discretionary placements.
21	Carefully monitor adherence to CCISD's policy and guidelines for using restraint to ensure compliance and target additional training to staff on high incident campuses.
22	Develop a system for documenting and tracking the use of time-out, not only at the campus level but also at the district level.
23	Follow best practice standards when starting and structuring SEPAC.
24	Create a special education parent resource center.
25	Improve district-level communications and provide more relevant information to parents through enhancements to the District's website, the special education newsletter, and social media.
26	Improve communications to parents regarding their child's academic and behavioral performance.
27	Ensure draft IEPs and other relevant materials are provided to parents within the required timeline prior to scheduled ARD meetings.

Project Objective and Scope

The primary objective of this comprehensive review of CCISD's special education program was to identify areas of strength as well as opportunities for improving program efficiency and effectiveness in order to improve outcomes for students receiving special education services. As part of the scope of this review, Gibson:

- Assessed the Special Services Department's organizational structure with respect to the logical alignment of key functions, reasonable spans of control, and ability to provide effective oversight and management of program resources.

- Assessed management's reporting and accountability systems and practices with respect to monitoring performance indicators and program compliance.

- Reviewed financial management practices, including Medicaid reimbursements, Maintenance of Effort, and General Fund contributions.

- Evaluated the effective use of technology to support efficient management and staff practices.

- Analyzed trends in department staffing levels relative to the number of students with disabilities.

- Evaluated the process for allocating teachers and paraprofessionals to schools and the extent to which it is driven by individual student needs.

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- Reviewed processes and systems for identifying and referring students who may be eligible to receive special education services, including RtI.

- Reviewed procedures to ensure that Full Individual and Initial Evaluations are unbiased and conducted timely.

- Analyzed the percentage of students that do not qualify for services and how these rates vary across and within school levels.

- Analyzed changes in the percentages of student with disabilities by primary disability and instructional arrangement/placement setting over time and relative to benchmark districts, regional, and state averages.

- Analyzed disproportionality rates and risk ratios for subgroup populations.

- Reviewed the program service delivery models to ensure all students with disabilities have access to a full continuum of high-quality programs and services that meet their individual needs in the least restrictive environment.

- Reviewed student performance and outcome data to assess overall program effectiveness.

- Reviewed the District's behavior management programs.

- Conducted a detailed review of a sample of Individualized Education Program (IEP) files to assess whether or not they are compliant, of high quality, and follow best practice standards.

- Evaluated efforts to increase parent involvement and overall parent satisfaction with the District's special education program and services.

- Analyzed special education teacher turnover rates and district practices for recruiting, hiring, and retaining high quality teachers and staff.

- Reviewed special education professional development opportunities available to both special education and general education teachers.

Project Approach and Methodology

The program strengths and opportunities for improvement included in this report were informed by the following information gathering and analytical activities.

Data Analysis and Benchmarking

As part of this review, Gibson collected and analyzed data provided by CCISD, which included special education population data and enrollment trends, historical financial data, staffing data, school data, student performance data, state performance plan indicator data, and other program-specific information. To provide additional context, Gibson also benchmarked CCISD to 7 peer districts, which were selected in collaboration with CCISD based on similar size, demographics, and/or regional proximity to CCISD (see Table 1-2). Gibson also compared CCISD to state and regional averages, where applicable.

All comparisons were made using publicly available data from the Texas Education Agency (TEA); in some cases, Gibson obtained data from TEA via a public information request.

Table 1-2. Profile of Benchmark Districts, 2017-18

District	Region	Total Enrollment	% Special Education	% Economically Disadvantaged	2016 SPED Determination Status*
Clear Creek ISD	**4**	**42,152**	**10.1%**	**29.1%**	**Meets Requirements**
Conroe ISD	6	61,580	8.1%	37.1%	Meets Requirements
Humble ISD	4	42,391	7.8%	32.3%	Meets Requirements
Katy ISD	4	77,522	10.1%	30.9%	Meets Requirements
Klein ISD	4	53,068	9.0%	39.9%	Meets Requirements
Leander ISD	13	39,028	11.1%	19.1%	Meets Requirements
Lewisville ISD	11	52,472	11.2%	32.2%	Meets Requirements
Round Rock ISD	13	49,086	9.4%	25.8%	Meets Requirements

Source: TEA, Public Education Information Management System (PEIMS) Standard Report (Enrollment by Population 2017-18 Report) and PEIMS Financial Data Report.

Note: *2016-17 Texas Academic Performance Report.

Individualized Education Program File Review

The review team conducted a detailed review of 35 student IEP files.[1] The primary objective of the IEP file review was to assess whether or not IEPs are compliant, of high quality, and follow best practice standards. In general, a quality IEP is in compliance with all requirements of state and federal laws and regulations and provides a clear statement of expected outcomes and the special education services and supports to be provided to the student. The IEP review was conducted using a rubric, developed by Gibson, to assess file completeness, compliance, placement decisions, and quality of documentation, such as instructional goals and objectives, reporting of student progress toward objectives, and behavior intervention plans (BIPs).

Interviews and Focus Groups

In October 2018, the Gibson review team conducted 24 individual interviews and 14 focus group sessions with district leadership, Special Services Department administrators and staff, related service providers, principals, special education and general education teachers, paraprofessionals, and two special education parent organizations. The primary objective of the interviews and focus group sessions was to gather anecdotal information about CCISD's special education programs and services and to assess stakeholder perceptions regarding areas of strength and opportunities for improvement. A complete list of interviewees and focus group sessions can be found in *Appendix A – Site Visit Roster*.

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[1] Students receiving speech-only services were specifically excluded from the IEP review.

School Visits and Classroom Observations

While on-site, the review team also visited 10 schools where they conducted interviews with principals and special education team leaders, and visited between three to five classrooms at each school. Schools were selected based on school level (elementary, intermediate, high), geographic location, Title I status, and specialized program offerings. Using a rubric developed by Gibson, the review team observed the instructional service delivery model being utilized (e.g., inclusion with support, resource room), instructional practices, student engagement, student goal tracking, and use of technology resources, including assistive technology devices. A list of the schools visited is included in *Appendix A – Site Visit Roster*.

Parent Input Session

While on-site, Gibson hosted an evening forum where all parents/guardians of special education students had the opportunity to provide written responses to the following four questions:

- In what ways could the district improve its programs and services to students with special needs?
- In what ways could the district improve communication and/or outreach to parents/guardians of students with special needs?
- Are there any areas where you feel the district and/or your school is meeting or exceeding your expectations with respect to special education programs and services?
- Is there anything else you would like the review team to know?

In an effort to have a high turnout, CCISD advertised the Parent Input Session in an email blast from the Superintendent, and in the monthly special education Newsletter. Parents unable to attend the forum were able to email their responses to Gibson. In total, Gibson received 117 written responses.

Parent Survey

Gibson administered a survey to all parents of special education students to measure perceptions of the quality and responsiveness of services their children are receiving. The survey instrument utilized was developed by the National Center for Special Education Accountability Monitoring (NCSEAM), which has been used extensively at the national level for accountability purposes. Each survey item response was rated by parents on a Likert-type scale ranging from 1 ("Very Strongly Disagree") to 6 ("Very Strongly Agree"). Parents also had the opportunity to respond to several open-ended questions similar to those posed in the parent forum. Surveys were administered in both English and Spanish using *Qualtrics*, a user-friendly online survey tool with technical capabilities that foster increased participation and survey completion. Parent's responses were linked to their student's data, so the review team was able to collect information about the characteristics of responding parents' children, including race/ethnicity, grade, age at referral to special education, and primary disability. In total, Gibson administered 4,629 surveys and had an overall response rate of 27 percent.

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The remainder of this report is organized into the following four chapters and appendices:

II. **Special Education Legal and Policy Framework:** Provides an overview of the federal legislation, CCISD board policies, and special education key terms framework in order to provide general context for this review.

III. **Special Education Program Management:** Examines the Special Services Department's organizational structure, staffing levels, fiscal management practices, and program compliance and accountability.

IV. **Program Service Delivery**: Examines the District's special education program service delivery framework through the lens of student enrollment and representation, Response to Intervention, specialized programs, curriculum and instructional practices, and student discipline.

V. **Parent Engagement and Support**: Provides a summary of parent feedback provided as part of this review, as well as a review of CCISD's parent engagement, communication and support strategies.

Appendices:

A. Site Visit Roster

B. Individualized Education Program File Review

C. Parent Survey Results

D. Parent Survey Instrument

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II. Special Education Legal and Policy Framework

This chapter provides an overview of the special education legal and policy framework and is presented to provide legal context for this review.

Federal Legislation

- **IDEA (2004):** The Individuals with Disabilities Education Act (IDEA) is a law ensuring services to children with disabilities throughout the nation. 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. Infants and toddlers with disabilities (birth-2) and their families receive early intervention services under IDEA Part C. Children and youth (ages 3-21) receive special education and related services under IDEA Part B. There are six major principles of IDEA:[2]

    - **Zero Reject:** Schools must educate all students with disabilities and public schools may not exclude students with disabilities, regardless of the nature or severity of their disabilities. *Child Find* is the term used for the requirement that school districts take responsibility for identifying and evaluating all children, from birth to 21, who are suspected of having a disability.

    - **Free Appropriate Public Education (FAPE):** All children with disabilities, regardless of the type or severity of disability, have a right to a free and appropriate public education, and it must be provided at public expense. An important part of the FAPE requirement is an Individualized Education Program (IEP) for each student. The IEP must articulate the student's unique needs, present levels of performance, measurable goals and objectives, and a description of the special education programs and related services that will be provided so that the child can meet his or her goals and learning objectives.

    - **Least Restrictive Environment (LRE):** The IDEA requires that students with disabilities be educated alongside children without disabilities to the maximum extent possible. Students with disabilities can be removed to separate classes or schools only when their disabilities are so severe that they cannot receive an appropriate education in general education classrooms with supplementary aids and services. The IDEA favors inclusion into general education with age-appropriate peers and requires that a student's IEP justify the extent to which the student will not participate with their non-disabled peers in the general education curriculum, extracurricular activities, and other non-academic activities like recess, lunch, and transportation. To ensure placement in the least restrictive environment, districts must provide a continuum of placement and service options.

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[2] Individuals with Disabilities Education Act (IDEA), Section 300.39

- **Nondiscriminatory Identification and Evaluation:** For students to receive special education services, the answers to both parts of a two-part question must be "yes". The first part of the question is "Does the student have a disability?" and the second part of the question is, "Does the student require specially designed instruction due to that disability?" When assessing students to determine the presence of a disability, schools must use non-biased, non-discriminatory, multi-factored evaluation methods. Evaluations may not discriminate on the basis of race, ethnicity, culture, or native language. All tests must be given in the student's native language and placement decisions may not be made on the basis of any single test score.

- **Due Process Safeguards:** Schools must provide due process safeguards to students with disabilities and their parents. One key safeguard is the requirement that school districts must obtain parental consent for evaluations and placement decisions. School districts must also maintain confidentiality of students' records. If parents disagree with the results of an evaluation performed by the District, they can request an independent evaluation at public expense. Parents have the right to request a due process hearing, usually preceded by mediation, if they disagree with the District's actions related to the identification, placement, related services, evaluation, or the provision of FAPE.

- **Parent and Student Participation and Shared Decision Making:** Parents' input and desires must be considered when districts write IEP goals, determine related service needs, and make placement decisions. In addition, schools are required to collaborate with parents and students with disabilities when designing and implementing special education services.

- **Every Student Succeeds Act (ESSA)**: The December 2015 reauthorization of the No Child Left Behind (NCLB) Act passed in 2001 also impacts students with disabilities in public schools. While ESSA was not aimed specifically at special education, it does address issues related to students with disabilities. Some of the key provisions in ESSA call for:

  - The same challenging academic content and achievement standards for all students, including students with disabilities

  - Annual assessments for all students aligned to standards

  - Appropriate accommodations for students with disabilities

  - Alternate assessments for students with the most significant disabilities

  - Measures of interim progress toward longer term goals

Public school teachers, including those who teach students with disabilities, are required to meet standards in order to be considered "highly qualified." Special education teachers must have a bachelor's degree or higher, state teaching certification, and be able to demonstrate competency in the core academic subjects they teach. The IDEA (2004) also added another requirement for special education teachers: their certification must include "appropriate special education

certification." The exact qualifications vary depending on teaching level and whether a teacher is the "teacher of record" for a student.

▪ **Section 504 of the Rehabilitation Act of 1973**: Section 504 of the Rehabilitation Act of 1973 is a national law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements apply to employers and organizations that receive financial assistance from any federal department or agency. Section 504 forbids organizations and employers from excluding or denying individuals with disabilities an equal opportunity to receive program benefits and services. Under this law, individuals with disabilities are defined as persons with a physical or mental impairment which substantially limits one of more major life activities. Major life activities include caring for one's self, walking, seeing, hearing, speaking, breathing, working, performing manual tasks, and learning.[3]

Clear Creek ISD Board Policy Framework

There are eight major Clear Creek ISD (CCISD) Board policies related to special education services. "Legal" policies contain compilations of federal law, state law, and court decisions as statutory context in which all other policies are to be read. "Local" policies reflect policies adopted by the CCISD Board; there is currently one major local Board policy in relation to special education. All CCISD Board policies are in the online Board Policy Manual on the District's web site at https://pol.tasb.org/Home/Index/505.

1. **Policy EHBA (LEGAL):** Describes the provision of services to special education, and covers the topics of nondiscrimination, Free and Appropriate Education (FAPE), Least Restrictive Environment (LRE), discipline, instructional arrangements and settings, other program options, shared services arrangements, related services definitions, and extended school year services.

2. **Policy EHBAA (LEGAL):** Outlines the District's requirements as it relates to the identification, evaluation, and eligibility of all children residing within the District who have disabilities, regardless of the severity of their disabilities, and who are in need of special education and related services.

3. **Policy EHBAB (LEGAL):** Requires the establishment of the Admission, Review and Dismissal (ARD) Committee and the individualized education program.

4. **Policy EHBAC (LEGAL):** Addresses the provision of services to students in non-district placements.

5. **Policy EHBAD (LEGAL):** Provides a definition of transition services and requirements for individualized transition planning.

6. **Policy EHBAE (LEGAL):** Requires the District to establish and maintain procedures to ensure children with disabilities and their parents are guaranteed procedural safeguards with respect to the provision of FAPE.

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[3] http://www.hhs.gov/ocr/civilrights/resources/factsheets/504.pdf

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7. **Policy EHBAF (LEGAL):** Outlines policy related to the video and audio monitoring of special education students and specifies that parental consent is not required if the video-tape or voice recording is to be used for a purpose related to the promotion of student safety.

> **Policy EHBAF (LOCAL):** Outlines CCISD specific policy for the timing of camera installation requests, the amount of time the camera is in operation, and the timing for reporting potential incidents.

8. **Policy FOF (LEGAL):** Policy regarding discipline and placement in a Disciplinary Alternative Education Placement (DAEP) for students with disabilities.

Special Education Terms

Like many academic programs, the special education program uses several terms that may not be familiar to many readers of this report. Below are definitions of these terms.

- **Admission, Review, and Dismissal (ARD) –** a committee established for each eligible student with a disability and for each student for whom a full and individual initial evaluation is conducted.

- **Behavioral Intervention Plan (BIP) –** a written plan of action for improving difficult behavior that is inhibiting a student's academic success.

- **Galveston-Brazoria Cooperative for the Deaf and Hard of Hearing (GBCDHH)** – A cooperative comprised of nine school districts, including CCISD, that provides a continuum of services for students with a variety of needs related to a student's hearing loss.[4]

- **Eligibility –** a student is eligible to participate in the District's special education program if the student is between the ages of 3 and 21 and: 1) the student has one or more of the disabilities listed in federal regulations, state law, or both; and 2) the student requires special education and related services.

- **Functional Behavior Assessment (FBA) –** is a result-oriented process that explicitly identifies problem behaviors, the specific actions that reliably predict the occurrence and non-occurrence of problem behaviors, and how the behaviors may change across time.

- **Individuals with Disabilities Education Act (IDEA) –** the primary federal law governing special education programs in the U.S.

- **Individualized Education Program (IEP) –** documented statement of the educational program designed to meet each special education student's individual needs.

- **Performance-Based Monitoring Analysis System (PBMAS) –** an automated data system that annually reports on the performance of school districts and charter schools in selected program areas, including special education (Texas Education Agency).

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[4] https://www.ccisd.net/departments/special_education_services/gbcdhh/

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- **Related Services –** transportation, and such developmental, corrective, and other supportive services as may be required to assist a child with a disability to benefit from special education, including the early identification and assessment of disabling conditions in children.

- **Response to Intervention (RtI) –** high-quality instruction and interventions for students' needs, monitoring of student progress to identify necessary changes in instruction or goals, and application of child response data when making educational decisions.

- **State of Texas Assessments of Academic Readiness (STAAR) –** state-mandated standardized tests used in Texas primary and secondary public schools to assess students' knowledge and achievements in each grade level.

- **Students with Disabilities (SWD) –** Students that qualify under the IDEA to receive special education and related services.

III. Special Education Program Management

This chapter provides Gibson Consulting Group's (Gibson) assessment of Clear Creek ISD's (CCISD/the District) special education program management. It addresses the following areas: department organizational structure and staffing, program compliance and accountability, and financial management.

Department Organizational Structure

The Clear Creek ISD Special Services Department is located at a stand-alone facility approximately four miles from the District's central administration building. The department is led by an Executive Director of Special Services who is responsible for directing the District's special education program. This position's primary responsibility is to ensure the provision of special education programs and services for students with disabilities that best meet their needs, and ensure compliance with all federal, state, and local requirements. The Executive Director is supported in this role by a Director of Special Education Programs and a Director of Special Education Support Services.

The Director of Special Education Programs is responsible for developing and overseeing on-going professional learning opportunities for district staff to ensure a quality learning environment and system knowledge of effective practices for the provision of special education and related services; providing assistance to staff in evaluating, selecting, and developing instructional materials to meet students' needs; and, encouraging and supporting the development of instructional programs. The Director of Special Education Programs also develops and oversees parental involvement strategies, plans and implements extended school year services (ESY), and monitors campus and district progress on statewide assessments, among other duties.

The Director of Special Education Support Services is responsible for providing leadership and direction to district administrators and staff regarding the identification, evaluation, and provision of special education and related services, as well as providing training and support to meet the behavioral and educational needs of identified students. The Director of Special Education Support Services also oversees Child Find activities.

Other positions within the Special Services Department that report directly to the Executive Director include:

- The Director of Galveston-Brazoria Cooperative for the Deaf and Hard of Hearing (GBCDHH), who is responsible for supervising and managing a nine-member district cooperative that provides a continuum of services for students from birth through Grade 12 with a variety of needs related to a student's hearing loss;

- The Coordinator of Early Learning (EL), who provides overall leadership and direction for the development, planning, implementation, policy and evaluation of the District's early education and elementary special education programs; and,

- The Dyslexia/504 Program Coordinator, who is responsible for administering the dyslexia and Section 504 program at the district level, including coordination of teacher support and staff development.[5]

Figure 3-1 illustrates the department's organizational structure for special education. Positions not shown on this organizational chart include school-based special education teachers, paraprofessionals, team leaders, support administrative staff (who report to campus principals), Licensed Vocational Nurses (who report to lead nurses), and bus drivers and aides (who report to the Transportation Department).

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[5] The Dyslexia/Section 504 program is excluded from the scope of this review.

Figure 3-1. CCISD Special Services Department Organizational Chart
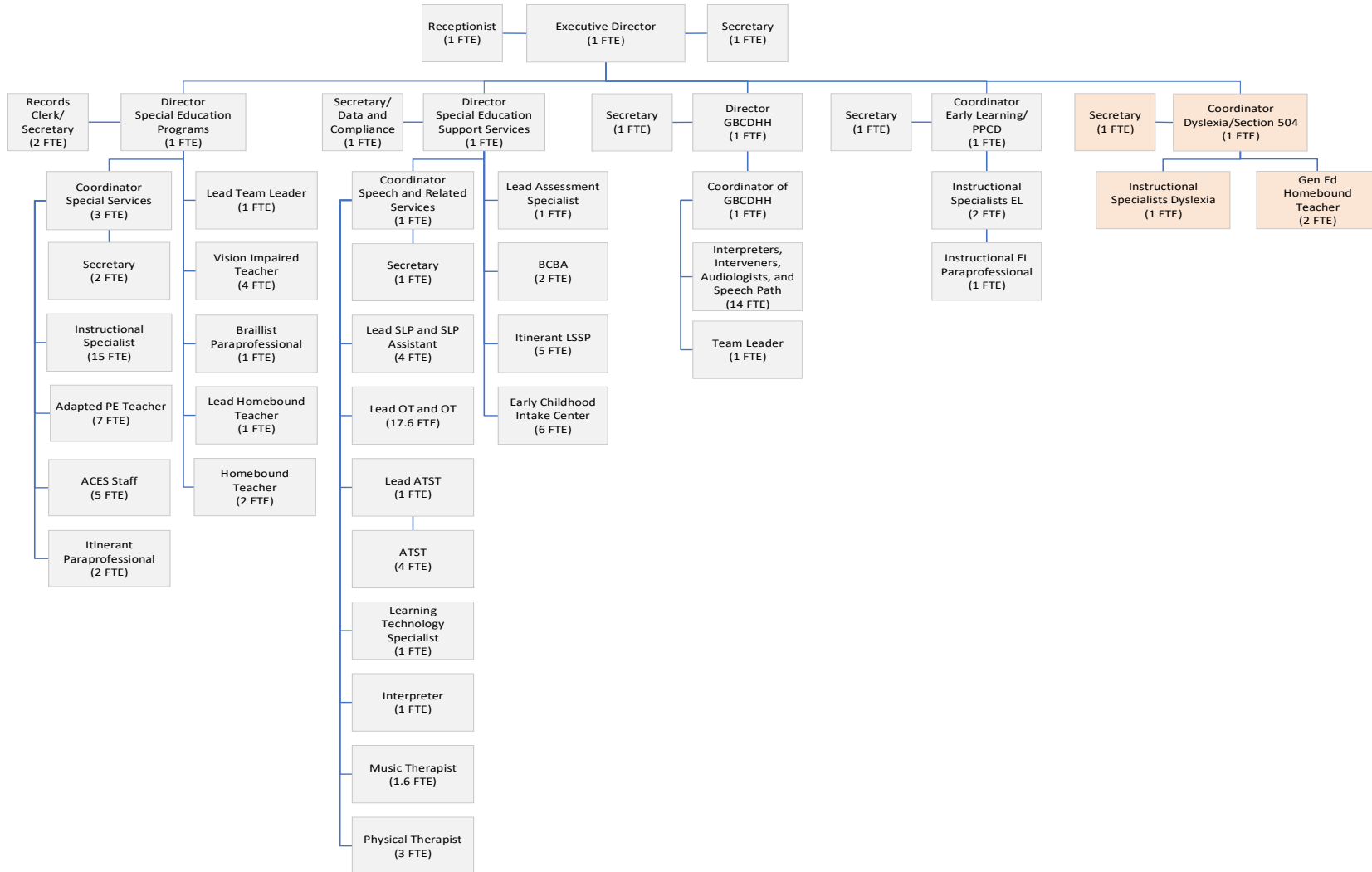
Source: Gibson Consulting Group, August 2018.

*Note: Acronyms: Adult Community Education Services (ACES); Speech Language Pathologist (SLP); Board Certified Behavior Analyst (BCBA); Occupational Therapist (OT); Physical Therapist (PT); Assistive Technology Support Team (ATST); Licensed Specialist in School Psychology (LSSP).

Program Strength: The Special Services Department organizational structure generally appears to support the effective oversight and management of special education program resources.

There are many ways special education departments can be structured as there are many programmatic elements that need to be considered, such as student disability types and specialization, program type or instructional setting, school level and/or feeder patterns, and function (e.g., administration, support services, professional development). In 2014-15, the Special Services Department was reorganized to provide more support and accountability for key functions. The previous Director of Special Education position was redefined as the Director of Special Education Programs and the job responsibilities for the Director of Special Education Support Services were expanded. The job duties of instructional specialists, who are responsible for providing direct support to campus staff, were reorganized to better support schools. This change allowed for more flexibility and consistency in the levels of support provided to campuses. Feedback during Gibson's interviews with department staff regarding the current organizational structure was favorable.

Recommendation 1: Upgrade the Coordinator of Early Learning/PPCD to a Director of Early Learning/PPCD position.

The Coordinator of Early Learning/PPCD is responsible for providing overall leadership and direction for the development, planning, implementation, policy, and evaluation of the District's early education and Preschool Program for Students with Disabilities (PPCD). Other responsibilities of this position include leading, directing, and developing full program design for all early childhood education (general education and special education) including facility, transportation, and instructional resource, developing and implementing a comprehensive strategic plan for early childhood education, and coordinating and monitoring the Pre-K/PPCD program to ensure consistency and continuity throughout the District, among other things. The scope of responsibilities of this position appear to be commensurate with director-level responsibilities and therefore it is recommended that the position be reclassified accordingly.

Recommendation 2: Review and update all job descriptions to ensure that they accurately reflect assigned roles, responsibilities, reporting relationships, and position qualifications.

A review of the department's position descriptions found that many job descriptions had not been updated since 2011 and the department name and reporting titles were inaccurate in some cases. Updated job descriptions are essential for ensuring that both supervisors and staff understand the essential knowledge, skills, abilities, responsibilities, and reporting structures for their position. It is also necessary for recruiting and hiring, conducting performance evaluations, determining ADA (Americans with Disabilities Act) accommodations, and mitigating employee complaints related to compensation or EEOC (Equal Employment Opportunity Commission) charges, among other things. CCISD should establish a plan to review and revise job descriptions every three years, or more often and as needed when job responsibilities or working conditions change.

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Program Staffing

Special education program staffing includes the department and campus-based staffing. Some positions, such as special education teachers, paraprofessionals, and team leaders are not assigned to the Special Services Department organization code, but to a campus organization code. Special education program budgeting is accomplished through a separate program intent code (code 23) in the District's accounting system. Including department and school-based positions, the Special Services Department is currently staffed with 1,059.1 full-time equivalents (FTEs), including the Dyslexia/504 Program staff and transportation staff; the special education program accounts for 941 FTE.

Table 3-1. CCISD Special Services Department FTEs, 2018-19

Position Type	Total FTEs
Teacher	378.3
Paraprofessional	331.0
Evaluation and Related Service Provider	131.2
Team Leader	47.5
Instructional Specialist	22.0
Secretary/Clerical	16.0
Coordinator	7.0
Department Leadership	4.0
LVN	4.0
Total Special Education Program FTEs	**941.0**
Transportation Bus Drivers and Aides**	90.0
Dyslexia/504 Program*	28.1
Total Other FTEs	**118.1**
Total Special Services Department FTEs	**1,059.1**

Source: CCISD Special Services Department, Position Roster.xlxs.
*Note: The Dyslexia/Sped 504 program is excluded from the scope of this review.
**Note: Bus Drivers and Aides are included in the Special Education budget but management and oversight of these positions is the responsibility of the Transportation Department.

Overall, total special education program staff decreased relative to the number of special education students from 2015-16 to 2018-19, with some fluctuation over the four-year time period. As shown in Table 3-2, the student-staff ratio for all positions increased, with the notable exception of the instructional specialists position, which decreased by 9 percent. A higher ratio indicates fewer staff relative to the student population; a lower ratio indicates more staff relative to the student population. The clerical/support staff ratio had the largest increase (staff count decrease relative to the student population), at 39 percent.

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Table 3-2. CCISD Special Education Student-Staff Ratio by Position Type, 2015-16 to 2018-19

Position Type	2015-16	2016-17	2017-18	2018-19	4-Year %Δ
SPED Students	**4,026**	**4,118**	**4,254**	**4,478**	**11.2%**
Total Staff	**893.3**	**827.2**	**930**	**941**	**5.3%**
SPED Student-Staff Ratio	**4.5**	**5.0**	**4.6**	**4.8**	**5.6%**
Teacher	11.4	12.8	11.2	11.8	**3.6%**
Paraprofessional	12.8	14.9	13.1	13.5	**6.0%**
Evaluation and Related Service Provider	31.5	34.9	32.8	34.1	**8.4%**
Team Lead	90.5	96.9	95.6	94.3	**4.2%**
Instructional Specialist	223.7	121.1	223.9	203.5	**-9.0%**
Secretary/Clerical	201.3	216.7	283.6	279.9	**39.0%**
Coordinator	575.1	588.3	607.7	639.7	**11.2%**
Department Leadership	1,006.5	1,029.5	1,063.5	1,119.5	**11.2%**
LVN	1,006.5	1,029.5	850.8	1,119.5	**11.2%**

Source: CCISD Special Services Department, Position Roster.xlxs.

Program Strength: Teachers and paraprofessionals are efficiently staffed and paraprofessionals in particular are utilized effectively.

Teachers and paraprofessionals comprise 40.2 percent and 35.2 percent, respectively, of total program staff. Figure 3-2 highlights the changes in CCISD's student-teacher ratio over the past four years relative to the percent of students in self-contained settings, which can be a key driver of teacher staffing levels. There is typically an inverse relationship between the student-teacher ratio and the percentage of students in self-contained settings. However, as the percent of CCISD students in self-contained settings increased from 2015-16 to 2018-19, the student-teacher ratio continued to increase, which is one indicator of staffing efficiency.

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Figure 3-2. Special Education Student-Teacher Ratio and Percent of Students in Self-Contained (SC) Settings, 2015-16 to 2018-19
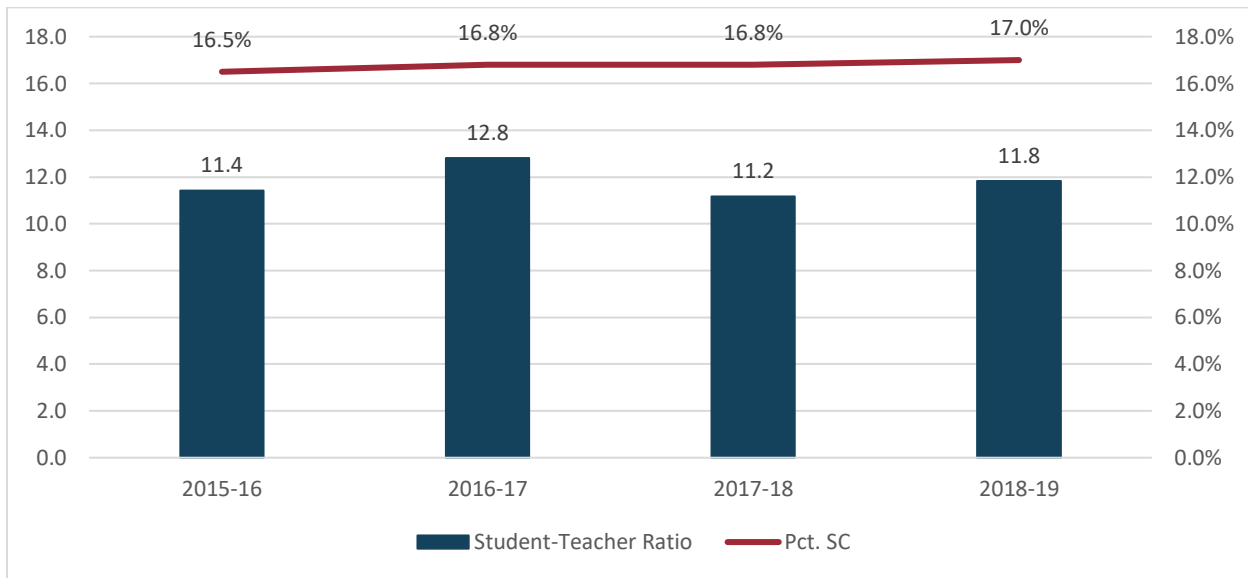
Source: CCISD Special Services Department, Position Roster.xlxs.

Figure 3-3 shows the special education student-teacher ratio for CCISD compared to the seven districts selected for comparison. All of the districts, except Humble ISD and Katy ISD, have student-teacher ratios that are well below the Region 4 (15.4) and state averages (15.3), indicating that they have more special education teachers relative to the number of special education students than most other districts. It is important to compare teacher-student staffing ratios across districts with caution because other variables that influence teacher staffing levels, such as the district's inclusion model (e.g., districts that implement co-teach will likely have more teachers and lower student-teacher ratios than district's that do not), is unknown for these comparator districts. CCISD does not have a district-wide co-teach initiative, although some schools reported during school visits that they have some co-teach classrooms.

Figure 3-3. Special Education Student-Teacher Ratio, 2017-18
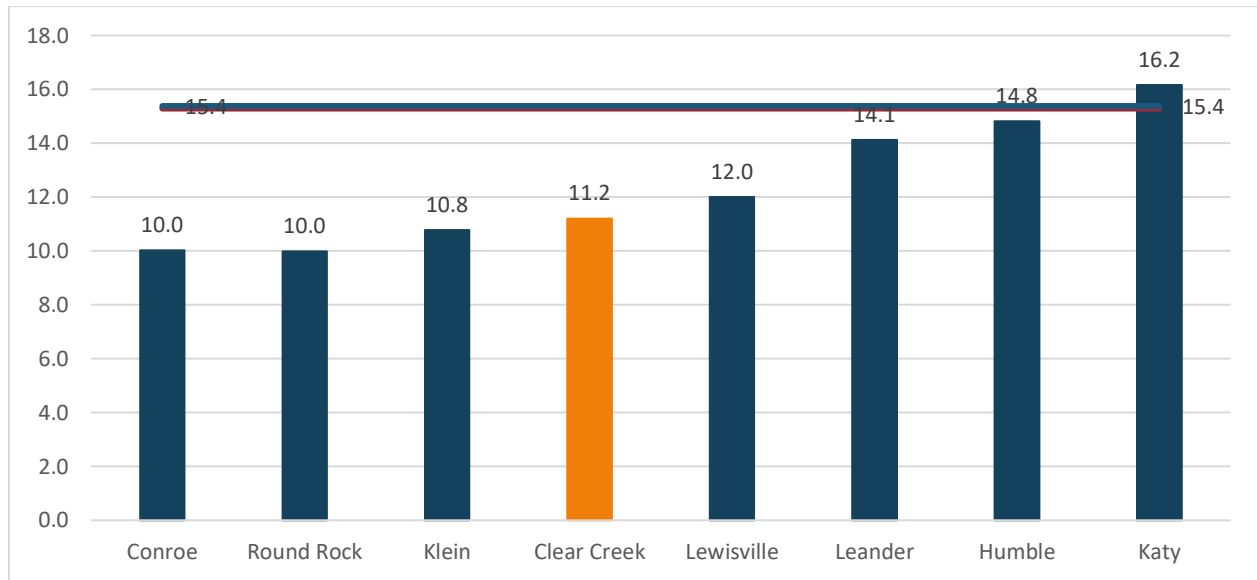
Source: Texas Education Agency (TEA) 2017-18 Texas Academic Performance Report (TAPR) Report. TEA public information request for percent of students in self-contained setting.

*TAPR data for CCISD showed a student-teacher ratio of 85.4, which is inaccurate. Therefore, Gibson calculated the student-teacher ratio for CCISD from position data provided by the department.

CCISD currently has an overall special education teacher-paraprofessional ratio of 1.16, which means that there are 16 percent more teachers than paraprofessionals. This is commendable since many districts often rely heavily on paraprofessionals to maintain student-adult ratios despite research that suggests that they have little positive effect on academic performance.[6] Ensuring that more resources are allocated to certified teachers rather than paraprofessionals is best practice.

The review team also evaluated the teacher-paraprofessional ratio by instructional setting and found that the teacher-paraprofessional ratio for inclusion/resource is 3.28 and the teacher-paraprofessional ratio for specialized programs is 0.61.[7] This illustrates that paraprofessionals are more heavily allocated to specialized programs rather than to inclusion/resource instructional settings.

Table 3-3. Teacher-Paraprofessional Ratio by Instructional Setting, 2015-16 to 2018-19

Instructional Setting	2015-16	2016-17	2017-18	2018-19
Inclusion/Resource	1.97	3.62	3.50	3.28
Specialized Program	0.60	0.59	0.61	0.61

Source: CCISD Special Services Department, Position Roster.xlxs.

CCISD's efficient and effective use of paraprofessional resources is further supported by training documentation provided by the department outlining the roles of teachers and paraprofessionals (see

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[6] *The Who, What and How of Paraprofessionals: Using These Instructional Supports Effectively*, Katie Bass, Autism Society.

[7] Analysis excludes 5 one-to-one aides.

Figure 3-4). Staffing paraprofessionals efficiently and ensuring that they are utilized in ways that is supported by research to be effective is best practice.

Figure 3-4. Teacher and Paraprofessional Roles in the Classroom

	Teacher Role	Paraprofessional Role
Classroom Organization	Plans weekly schedule, lessons, room arrangements, learning centers, and actives for individuals and the entire class	Implements plan as specified by the teacher.
Assessment	Administers and scores formal and informal tests	Administers informal tests
Setting Objectives	Determines appropriate objectives for groups of individual students	Carries out activities to meet objectives
Teaching	Teaches lessons for the entire class, small groups, and individual students	Reinforces and supervises practice of skills with individual and small groups
Behavior Management	Observes behavior plans and implements behavior management strategies for entire class and for individual students	Observes behavior, carries out behavior management plans
Working with Parents	Meets with parents and initiates conferences concerning student progress	Communicates with teacher regarding student needs to allow for teacher communication with parents
Building a Classroom Partnership	Arranges schedule for conference, shares goals and philosophy with paraprofessional, organizes job duties for the paraprofessional	Shares ideas and concerns during conferences and carries out duties as directed by the teacher

Source: CCISD "Inclusion Paraprofessional Training" presentation.

Recommendation 3: Ensure Licensed Specialists' in School Psychology total compensation (salaries and benefits) is competitive and explore other strategies to more effectively attract and retain staff.

Gibson's analysis shows that CCISD's Licensed Specialists in School Psychology (LSSPs) experience high turnover and have lower average salaries and higher average staffing ratios than LSSPs in the benchmark districts. LSSPs perform professional psychological work in assessment, behavior management, and counseling for students with emotional disabilities, learning disabilities, and behavioral problems. In CCISD, LSSPs are part of an evaluation team (which includes Diagnosticians and SLPs) and are responsible for assessing the psychological and psycho-educational needs of students referred to special education services. In 2018-19, CCISD experienced a 29.6 percent LSSP turnover rate (shown in Table 3-4) and currently has 1.0 FTE LSSP vacant position.

Table 3-4. LSSP Turnover, 2017-18 to 2018-19

Position	2017-18 FTE	2018-19 FTE	FTE Δ	# Employee Turnover	Turnover Rate
LSSP	27	24	3	8	29.6%

Source: CCISD Special Services Department, Position Roster.xlxs.

Anecdotal information obtained during interviews and focus group sessions suggests that lower salaries and higher caseloads may be contributing factors to the high turnover rate. Compared to benchmark

districts, LSSPs in CCISD have the second lowest average salary ($60,206, which is 6.6 percent lower than the benchmark district average ($64,429) and 7.5 percent lower than the Region 4 (Humble ISD, Katy ISD, Klein ISD) benchmark district average ($65,115).

Figure 3-5. LSSP Average Salary, 2016-17
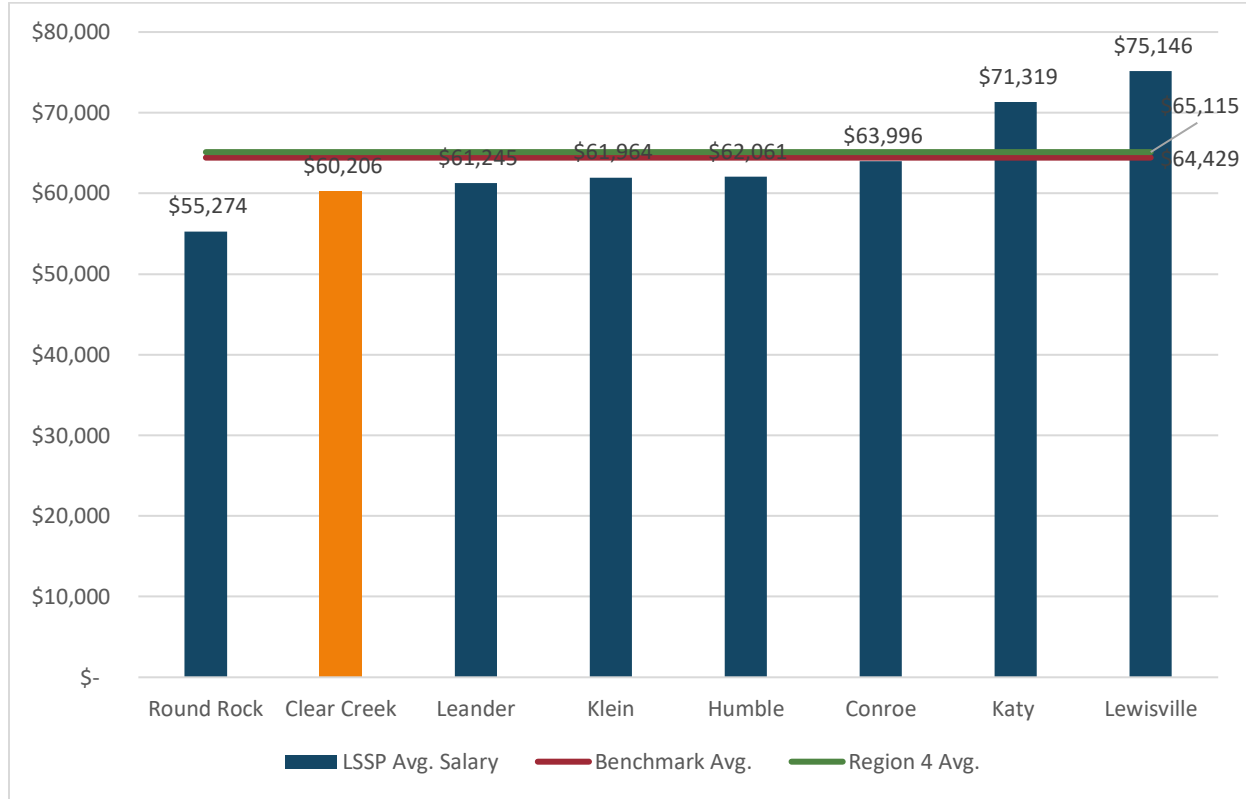
Source: *Staff FTE Counts and Salary Reports*, Texas Education Agency, 2013-14 to 2017-18.

Comparing staffing ratios over time and to benchmark districts serves as an important indicator of the appropriateness of overall staffing levels. Since many districts utilize a mix of LSSPs and diagnosticians on their evaluation teams, it is more appropriate to compare staffing ratios for both of these positions combined. By this metric, CCISD has the second highest staffing ratio compared to the benchmark districts, indicating lower staffing than peer districts relative to student populations.

Table 3-5. Special Education Students per LSSP/Diagnostician FTE, 2017-18

District	SPED Students	LSSP FTE	Diagnostician FTE	Student-LSSP/Diag Ratio
Humble	3,317	27.4	44.0	46.5
Conroe	5,013	24.9	64.6	56.0
Katy	7,805	42.0	88.8	59.7
Klein	4,768	34.7	31.8	71.7
Lewisville	5,866	21.0	57.7	74.5
Leander	4,341	34.7	19.5	80.0
Clear Creek*	**4,254**	**27.0**	**23.0**	**85.1**
Round Rock	4,597	33.0	10.8	104.9

Source: *Staff FTE Counts and Salary Reports*, Texas Education Agency, 2013-14 to 2017-18.

*CCISD data reported to TEA was inaccurate (8 LSSPs and 40.9 Diagnosticians), therefore Gibson relied on the FTEs for these positions reported in the District's position data.

It is important to note here that staffing ratios are not the same as staffing caseloads, which is a more precise measure of staff workload. Even still, wide variances in average caseloads for LSSPs, diagnosticians, and other evaluation staff may exist due to factors such as the intensity of direct and indirect services provided (in terms of Individual Education Program minutes); the number of campuses served and their geographic proximity (i.e., travel time); the number of Admission, Review, and Dismissal (ARD) meetings attended; and, the number of screenings, initial evaluations and reevaluations performed. For these reasons, it is difficult for Gibson to determine whether or not CCISD's LSSP caseloads are too high or too low. However, in focus group sessions some staff reported feeling stretched and others felt that workloads were unbalanced. Staff also reported working one Saturday per month (for extra duty pay) to perform student testing and "catch up" on report writing. Importantly, although some parents expressed concern during focus groups or on their survey responses that there were delays in their child's full individual and initial evaluation (FIIE) or reevaluation, Gibson did not find evidence of any backlogs through interviews with program staff or as part of the Individualized Education Program (IEP) file review (see *Appendix B – Individualized Education Program File Review*).

Management should collaborate with the Department of Human Resources to conduct a salary survey for LSSP positions (and others as appropriate) to determine if current total compensation (salaries and benefits) is competitive with neighboring districts. Because these positions are highly sought after, many districts also offer hiring bonuses or step adjustments to more effectively recruit candidates; some districts offer retention bonuses after 3 or 5 years of service to reduce turnover for key positions. Further, CCISD should continue to evaluate and monitor LSSP and diagnostician caseloads to ensure that they are reasonable and manageable. Additional evaluation positions would eliminate the need for staff to work on Saturdays and may improve morale and retention.

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Financial Management

Table 3-6 presents a history of the District's total program operating expenditures and special education program expenditures, both of which have increased over the past five years.[8] The percentage of CCISD's special education program expenditures in 2016-17 (the most recent year of available data) is 3.8 percentage points (24 percent) above the state average. Most of this difference is explained by variance between the CCISD and state average Special Education pupil-teacher ratios, 12.8 and 15.4, respectively.

Table 3-6. CCISD Total Program Operating Expenditures, All Funds, 2012-13 to 2016-17
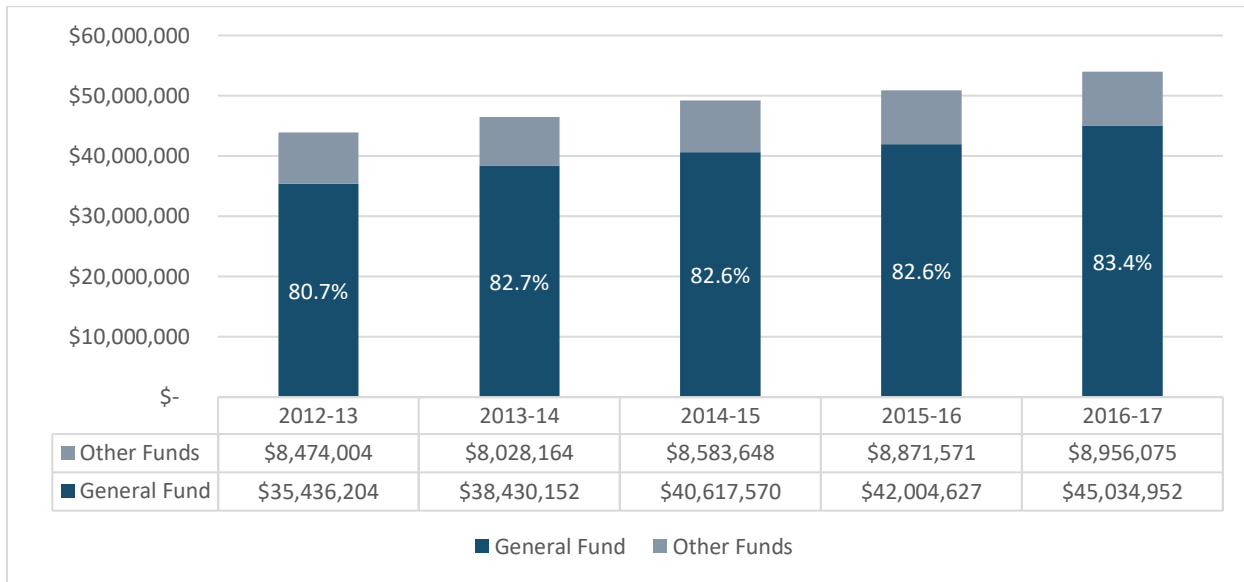
	2012-13	2013-14	2014-15	2015-16	2016-17
CCISD Total Program Operating Expenditures	$227,869,700	$243,833,080	$260,543,405	$268,178,462	$277,603,087
Sped Program Operating Expenditures	$43,910,208	$46,458,316	$49,201,218	$50,876,198	$53,991,027
CCISD % SPED Program	**19.3%**	**19.1%**	**18.9%**	**19.0%**	**19.4%**
State % SPED Program	**15.5%**	**15.2%**	**15.2%**	**15.2%**	**15.6%**

Source: TEA, Public Education Information Management System (PEIMS) Report 2000-2017 Summarized Financial Data.

Figure 3-6 shows CCISD's special education program expenditures (all funds), and the portion that is attributed to the General Fund. Total program expenditures increased $10.1 million, or 23 percent, over the past five years. The percentage of total program expenditures accounted for by the General Fund increased by 2.7 percentage points, from 80.7 to 83.4 percent. The increased reliance on local tax revenues to fund special education programs reflects a state-wide pattern.

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[8] These expenditures include expenditures for services to students with disabilities (special education) and the costs incurred to evaluate, place, and provide educational and/or other services to students who have IEPs approved by ARD committees (program intent code 23).
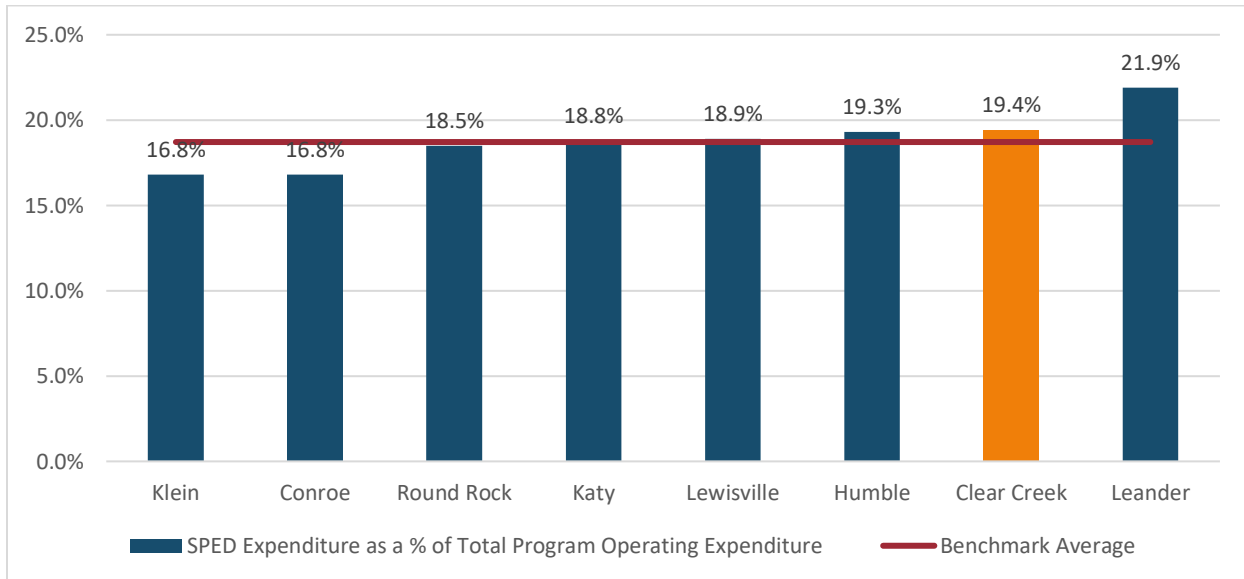
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Figure 3-6. CCISD Special Education Program Operating Expenditures, All Funds, 2012-13 to 2016-17

	2012-13	2013-14	2014-15	2015-16	2016-17
Other Funds	$8,474,004	$8,028,164	$8,583,648	$8,871,571	$8,956,075
General Fund	$35,436,204	$38,430,152	$40,617,570	$42,004,627	$45,034,952

(General Fund percentages shown on chart: 80.7%, 82.7%, 82.6%, 82.6%, 83.4%)

Legend: General Fund   Other Funds

Source: TEA, PEIMS Report 2000-2017 Summarized Financial Data.

As a percentage of total district program operating expenditures (all funds), CCISD spends 19.4 percent on its special education program, which is the second highest in the peer group (see Figure 3-7).

Figure 3-7. Special Education Program Operating Expenditures as a Percentage of Total Program Operating Expenditures, All Funds, CCISD and Peer Districts, 2016-17

Klein	Conroe	Round Rock	Katy	Lewisville	Humble	Clear Creek	Leander
16.8%	16.8%	18.5%	18.8%	18.9%	19.3%	19.4%	21.9%

Legend: SPED Expenditure as a % of Total Program Operating Expenditure   Benchmark Average

Source: TEA, PEIMS Report 2000-2017 Summarized Financial Data.

The special education program operating expenditures per special education student (headcount) increased 13.5 percent from 2012-13 to 2016-17. This represents an average increase of just over 3 percent per year.

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Figure 3-8. CCISD Special Education Program Operating Expenditures per Special Education Student (Headcount), All Funds, 2012-13 to 2016-17
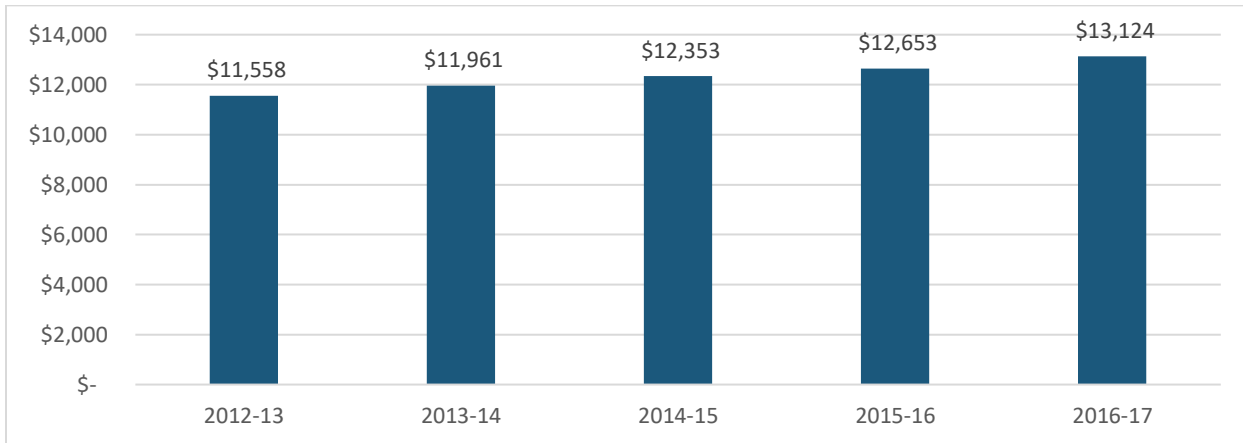
Source: TEA, PEIMS Financial Data. Calculated $/pupil by dividing Total Special Education Program Expenditures (All Funds) by the total number of special education students (headcount).

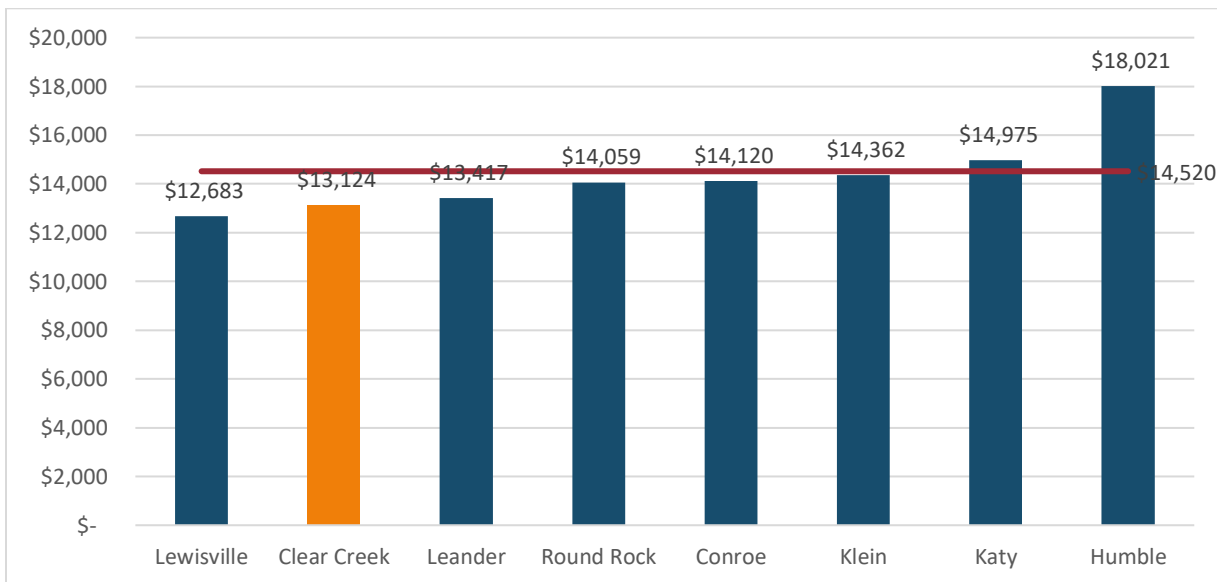Figure 3-9 compares CCISD special education program spending per special education student to its peers. CCISD spends $1,396 less per pupil than the average of the benchmark districts.

Figure 3-9. Total Special Education Program Expenditures per Pupil (Headcount), All Funds, CCISD and Peer Districts, 2016-17

Source: TEA, PEIMS Financial Data. Calculated $/pupil by dividing Total Special Education Program Expenditures (All Funds) by the total number of special education students (headcount).

It is interesting to note that CCISD has lower expenditures per pupil even though it is at the peer average when comparing special education pupil-teacher ratios. This indicates more efficient non-teacher spending, which reinforces the observation made earlier in this chapter regarding program staffing.

Maintenance of Effort

Maintenance of Effort (MOE) refers to the requirement that all school districts that receive federal funding under part B of the Individuals with Disabilities Education Act must spend at least the same amount, in the aggregate or per pupil basis, of state and local funds to provide services to students with disabilities as the previous fiscal year. The Finance Department is responsible for submitting these calculations annually to TEA. A review of current year and historical data shows that CCISD is compliant with all MOE requirements.
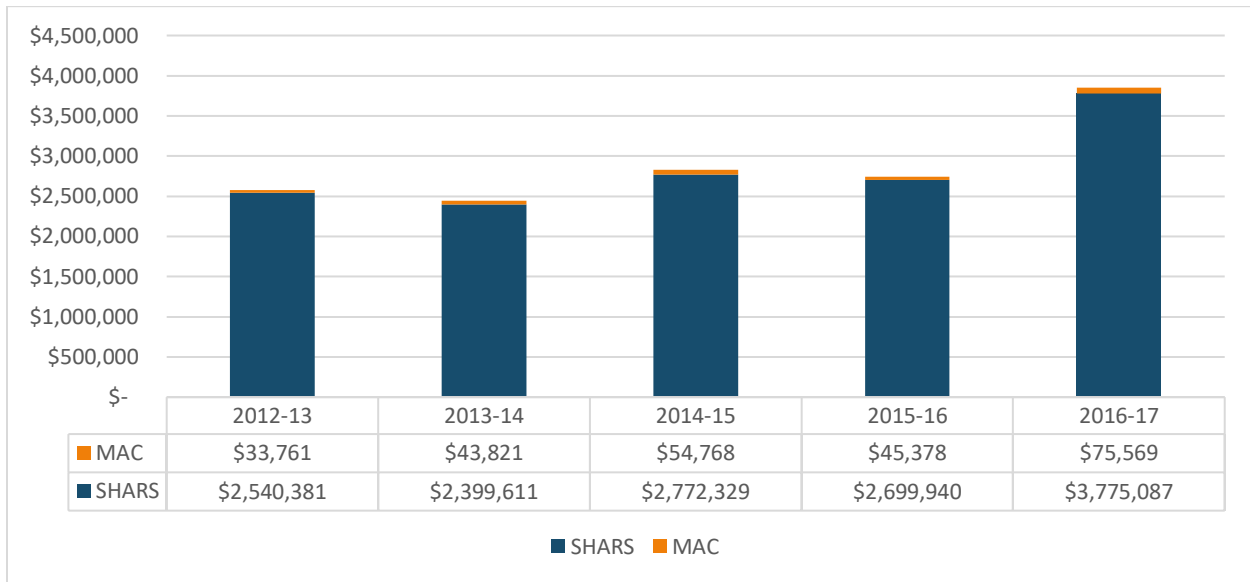
Medicaid Reimbursement

There are two programs that provide Texas school districts the opportunity to obtain reimbursement for certain costs related to the administration and/or provision of certain health-related services to Medicaid-eligible special education students: School Health and Related Services (SHARS) and Medicaid Administrative Claiming (MAC). SHARS allows school districts to obtain Medicaid reimbursement for certain health-related services documented in a student's IEP, while MAC allows school districts the opportunity to obtain reimbursement for certain costs related to health administrative activities that support the Medicaid program.[9]

Recommendation 4: Increase Medicaid reimbursements by obtaining blocked billing reports from MSB and pursuing physician referrals for eligible students and services.

Figure 3-10 shows CCISD's total Medicaid reimbursements for the past 5 years. The 40.3 percent increase from 2015-16 to 2016-17 can be attributed to the implementation of MSB X Logs, a web-based service delivery-tracking tool which allows service providers to electronically record and report on the services they provide to special education students. X Logs allows for maximized reimbursement to the District because providers simply record what happens with their students and then MSB extracts what is Medicaid billable on the back end.

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[9] Texas Health and Human Services Website: http://legacy-hhsc.hhsc.state.tx.us/rad/mac/eci-mac.shtml

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Figure 3-10. CCISD Medicaid Reimbursements, 2012-13 to 2016-17

	2012-13	2013-14	2014-15	2015-16	2016-17
■ MAC	$33,761	$43,821	$54,768	$45,378	$75,569
■ SHARS	$2,540,381	$2,399,611	$2,772,329	$2,699,940	$3,775,087

■ SHARS ■ MAC

Source: TEA PEIMS data.

Figure 3-11 shows the corresponding 37.1 percent increase in Medicaid reimbursement per special education student.

Figure 3-11. CCISD Medicaid Reimbursements per Special Education Student, 2012-13 to 2016-17
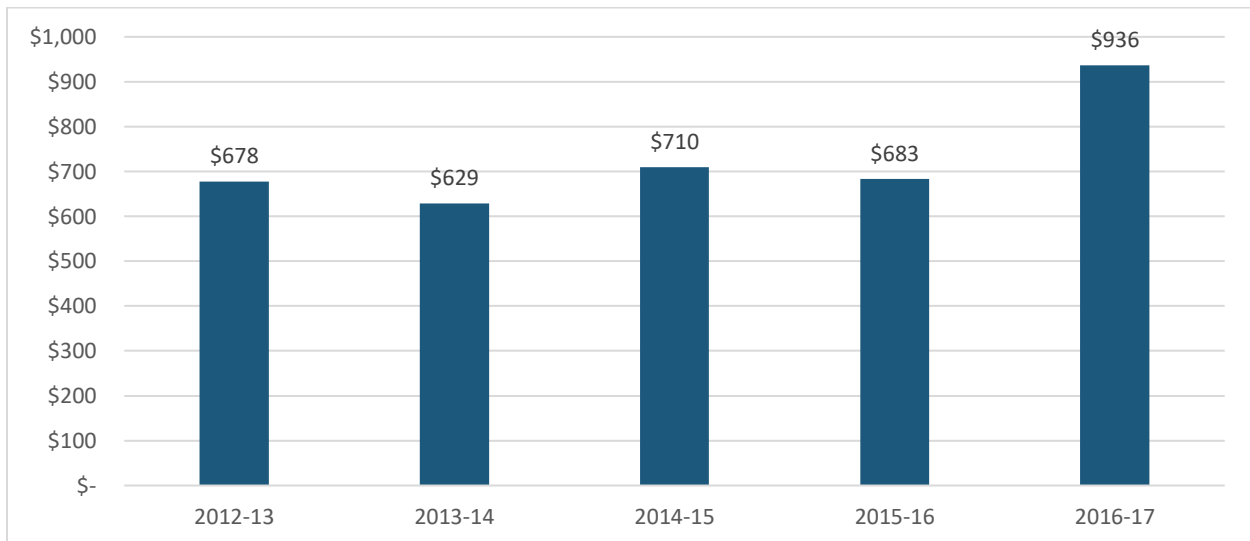
Source: TEA PEIMS data.

Despite the significant increase in Medicaid reimbursement, comparisons to benchmark districts suggests that there is still an opportunity for improvement. Figure 3-12 illustrates that CCISD's Medicaid reimbursement per special education student in 2016-17 was lower than all of the benchmark districts except Lewisville ISD.

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Figure 3-12. Total Medicaid Reimbursements per Special Education Student, 2016-17
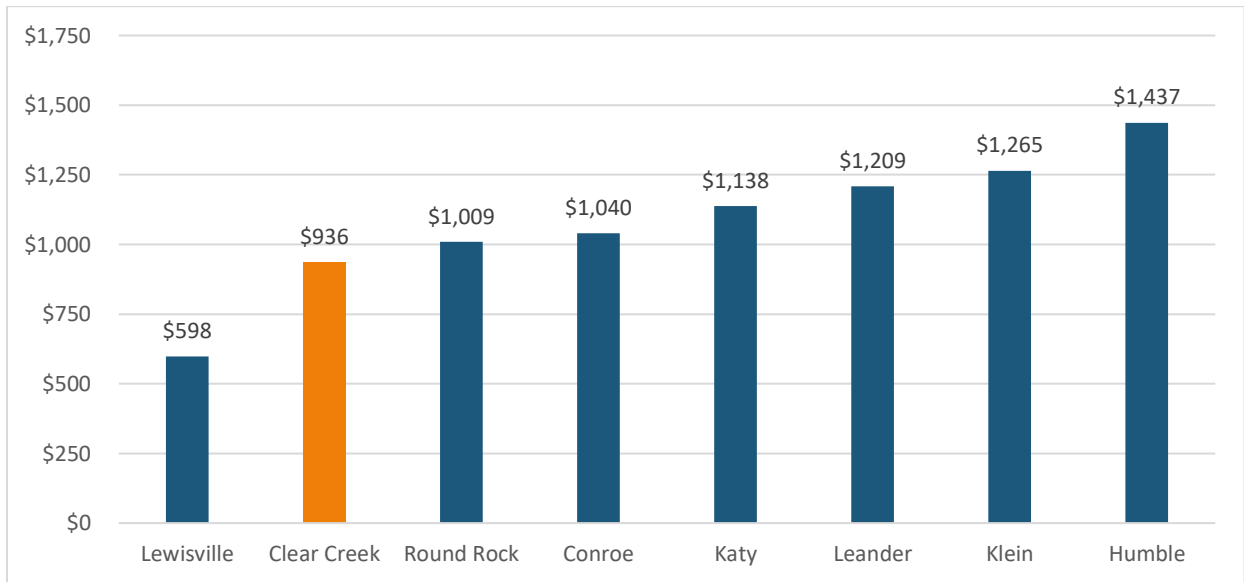
Source: TEA PEIMS data.

CCISD could further increase Medicaid reimbursements by obtaining required physician referrals for eligible students. Medicaid reimbursement can be sought for related service assessments and delivery; however, in order to receive reimbursement for these services, they must be prescribed, referred, and/or recommended (depending on the type of service) by a physician or other licensed health care practitioner within the scope of his or her practice under state law. A district's inability to obtain appropriate provider certification to meet this requirement should not under any circumstances delay or prevent the delivery of services required in a child's IEP; however, districts that cannot secure the appropriate provider credentials will not be eligible to receive reimbursement under Medicaid for services rendered by those providers.

According to department staff, some special education students receiving related services are Medicaid-eligible and would therefore qualify for reimbursement if the required documentation were provided. CCISD is presently working with MSB to obtain a report that lists students with blocked reimbursements so that the District can then work directly with those students' families to obtain the necessary physician referral or prescription. Once this issue is fully addressed, CCISD's Medicaid reimbursements should increase.

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Program Compliance and Accountability

Data Quality

CCISD utilizes multiple systems to manage special education data:

- *eSped*, produced by Frontline Education, is used to store student IEPs, student progress, and demographic information.

- *Skyward*, provided by Skyward, Inc., is CCISD's student information system, but also stores Response to Intervention information.

- *itslearning*, provided by itslearning AS, is CCISD's learning management system, is used to store lesson plans, course materials, and assignments.

PEIMS encompasses all data requested and received by the Texas Education Agency about public education, including student demographic and academic performance, personnel, financial, and organizational information. This information is used by TEA to analyze Texas public education data through data reports, evaluations, TAPR/accountability ratings, and funding calculations. For the PEIMS electronic collection, school districts are required to submit their data via standardized computer files, as defined by the PEIMS Data Standards.[10]

As part of this review, Gibson analyzed CCISD's PEIMS data and found many instances where data appeared to be inaccurate and reported inconsistently from year to year. For example, Table 3-7 shows the number of special education students and teachers reported to PEIMS on the TAPR the past 3 years.

Table 3-7. CCISD TAPR Report, 2015-16 to 2017-18

	2015-16	2016-17	2017-18
SPED Students	3,947	4,021	4,161
SPED Teachers	215.3	48.2	85.8
Teacher-Student Ratio	**18.3**	**83.4**	**48.5**

Source: TEA, CCISD TAPR reports.

CCISD's Department of Assessment and Evaluation reports that these inaccuracies (and others) were the result of a coding issue in Skyward, which has since been corrected. The Department of Assessment and Evaluation also reports that they have made the necessary process and control changes over state submitted data to avoid this issue moving forward.

Student Performance

The goal of any school district is to improve the educational results and outcomes for all students with disabilities. How well the district is educating its students with disabilities can be measured by looking at a variety of indicators, including participation in assessments, percent proficient on state assessments,

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[10] 2018-19 Texas Education Data Standards (TEDS), July 1, 2018.

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improvement in proficiency over time, achievement gap between special education students and general education students, student retention, and graduation and dropout rates.

Texas' student assessment program is designed to measure the extent to which a student has learned and is able to apply the defined knowledge and skills at each tested grade or course level. In the spring of 2012, Texas students began taking the State of Texas Assessments of Academic Readiness (STAAR) exams. The STAAR is used to test students in Grades 3 through 8 in math and reading, students in Grades 4 and 7 in writing, students in Grades 5 and 8 in science, and students in Grade 8 in social studies. Five end-of course assessments are usually taken between Grades 9 and 12. The STAAR Modified was offered for the last time in 2013-14 after the United States Department of Education informed states that assessments based on modified standards would no longer count toward accountability purposes. Beginning in 2017, most students with disabilities took the STAAR, with or without accommodations, or the STAAR Alternate 2. The STAAR Alternate 2 is an assessment based on alternate academic standards and is designed for students with the most significant cognitive disabilities receiving special education services.[11] Determination of the appropriate assessment is made by the ARD committee based on students' instructional supports and current level of functioning.[12]

Tables 3-8 and 3-9 show the percentage of CCISD special education and non-special education students who were *At Approaches Grade Level* on the STAAR tests in 2018 including end-of-course (EOC) assessments. The special education and non-special education student participation rates on the STAAR were both at 99 percent (included in accountability). The difference between special education student proficiency and their non-special education peers is referred to as the performance (or achievement) gap. The performance gap in CCISD is wide in all subject areas, which is a typical yet concerning national pattern. The widest gap for STAAR 3-8 is in writing with a 39-percentage point variance and for the STAAR EOC is English II with a 48-percentage point variance.

Table 3-8. CCISD STAAR Percentage *At Approaches Grade Level or Above*, All Grades, 2017-18

Subject	All Students	SPED	Performance Gap
All Subjects	84	50	34
Reading	84	47	37
Math	87	57	30
Writing	74	35	39
Science	85	54	31
Social Science	83	50	33

Source: Texas Performance Reporting System, TEA website.

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[11] Texas Assessment Management System: http://texasassessment.com
[12] Texas Education Agency (TEA) website: http://tea.texas.gov/student.assessment/SWD/

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Table 3-9. CCISD EOC Percentage *At Approaches Grade Level or Above*, 2017-18

Subject	All Students	SPED	Performance Gap
English I	78	32	46
English II	81	33	48
Algebra I	91	61	30
Biology	95	74	21
US History	96	72	24

Source: Texas Performance Reporting System, TEA website.

The PBMAS is used by the Texas Education Agency as part of its overall evaluation of school district performance and program effectiveness. These reports include the performance of school districts in selected program areas, one of those being special education.

The PBMAS has 16 performance indicators relating to various aspects of students with disabilities and program performance. A performance level of "0" is the highest performing designation for any indicator while a performance level of "4" is the lowest performing designation. The total performance level aggregate results in one of the following four determination statuses: Meets Requirements, Needs Assistance, Needs Intervention, or Needs Substantial Intervention. The performance level (PL) determination, in turn, results in a range of TEA enforcement actions ranging from providing technical assistance (for Needs Assistance) to withholding funds and referring the district to legal authorities (for Needs Substantial Intervention).[13] In 2017-18, CCISD's special education program determination status in was "Meets Requirements."[14]

Tables 3-10 and 3-11 compare passing rates for the CCISD special education students to the PBMAS standard for 2015-16, 2017-18, and 2017-18 on the STAAR 3-8 and EOC assessments. On the STAAR 3-8, CCISD's passing rates in every subject were below the state's target, but have increased over this 3-year time period. Passing rates were highest in math (PL=1), followed by reading and science (PL=2). Notably, the PL increased from 2015-16 in both math and science. Passing rates are lowest in writing and social studies, where the PL remains at a 3 in both subjects.

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[13] http://tea.texas.gov/pbm/PBMASManuals.aspx
[14] Clear Creek ISD 2016-17 Texas Academic Performance Report (TAPR).

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Table 3-10. Special Education STAAR Combined 3–8 Passing Rates – PBMAS Indicator 1, 2015-16 to 2017-18

Subject	PBMAS Standard	2015-16		2016-17		2017-18	
		District Rate	Performance Level	District Rate	Performance Level	District Rate	Performance Level
Math	70	47.3	2	54.2	2	56.3	1
Reading	70	41.4	2	46.9	2	54.2	2
Science	65	37.7	3	41.4	2	45.4	2
Social Studies	65	25.5	3	25.7	3	34.3	3
Writing	70	32.3	3	29.2	3	35.8	3

Source: 2018 PBMAS, TEA website.

On the STAAR EOC assessments, CCISD's passing rates have improved significantly and exceeded the state targets in math, science, and social studies in 2017-18. Passing rates are lowest in English Language Arts (ELA), where the PL is a 2.

Table 3-11. Special Education STAAR EOC Passing Rates – PBMAS Indicator 3, 2015-16 to 2017-18

Subject Content Area	PBMAS Standard	2015-16		2016-17		2017-18	
		District Rate	Performance Level	District Rate	Performance Level	District Rate	Performance Level
Math	65	38.8	3	49.1	2	61.9	0
Science	75	61.8	2	64.2	2	74.2	0
Social Studies	70	70.4	0	72.7	0	71.9	0
ELA	60	33.4	2	27.9	3	31.9	2

Source: 2018 PBMAS, TEA website.

Table 3-12 compares CCISD's special education student passing rates by subject to the seven benchmark districts selected for comparison. From highest to lowest, CCISD's STAAR scores ranked 4th in reading, 5th in writing, 7th in math and social studies, and 8th in science.

Table 3-12. STAAR Special Education Percentage Passing, All Grades, 2017-18

District	Math	Reading	Science	Soc. Studies	Writing
Clear Creek	**56.3**	**54.2**	**45.4**	**34.3**	**35.8**
Conroe	60.1	49.6	46.1	36.2	33.5
Humble	49.8	48.3	47.7	39.7	30.8
Katy	66.8	60.7	62.2	50.8	47.9
Klein	57.5	51.4	49.1	33.4	31.9
Leander	63.6	58.8	56.5	53.4	35.9
Lewisville	57.3	55.2	46.7	35.5	35.9
Round Rock	59.2	53.4	51.3	44.2	36.7
Clear Creek Rank	**7th**	**4th**	**8th**	**7th**	**5th**

Source: 2018 PBMAS, TEA website.

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On the EOCs, CCISD ranked 3rd in math and science and 6th in social studies and ELA.

Table 3-13. EOC Special Education Percentage Passing, 2017-18

District	Math	Science	Soc. Studies	ELA
Clear Creek	61.9	74.2	71.9	31.9
Conroe	46.5	66.9	76.6	30.5
Humble	52.3	62.3	72.4	34.0
Katy	60.8	72.3	77.8	39.6
Klein	43.4	58.9	64.9	25.0
Leander	53.8	75.9	76.8	33.9
Lewisville	75.0	77.4	78.6	38.7
Round Rock	53.9	63.1	71.3	34.6
Clear Creek Rank	3rd	3rd	6th	6th

Source: 2018 PBMAS, TEA Website.

Multiple studies have confirmed that students raised in poverty are especially subject to stressors that undermine school academic performance.[15] In the case of CCISD, it is important to note that 28.4 percent of students are economically disadvantaged, which is lower than all of the benchmark districts except Leander ISD and Round Rock ISD.

In general, students with disabilities who participate in alternate assessments are unable to participate in regular assessments even with accommodations. Some of these students may have significant cognitive disabilities and can be assessed using alternate formats aligned to the grade-level content, but based on alternate achievement standards that define proficiency differently from the general assessment. Other students may receive alternate assessments aligned to grade-level content that is based on grade-level achievement standards, or the same definition of proficiency as the general assessment.

The most common types of alternate assessment approaches are:

- **Portfolio:** Student portfolios are a purposeful and systematic collection of student work that is evaluated and measured against predetermined scoring criteria.

- **Performance Assessment:** These assessments are direct measures of a skill, usually in a one-on-one assessment. These can range from highly structured one-on-one assessments similar to traditional pencil/paper test, to a more flexible approach that can be adjusted based on student needs.

- **Checklist:** This method relies on teachers to remember whether students are able to carry out certain activities. Scores reported are usually based on the number of skills that the student was able to successfully perform.

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[15] Teaching with Poverty in Mind: What Being Poor Does to Kid's Brains and What Schools Can Do About It; Eric Jensen, ASCD, 2009.

Student performance on the STAAR 3-8 and EOC Alternate 2 assessments compares favorably to benchmark districts in all subjects.

Table 3-14. STAAR 3-8 Alternate 2, Percent Satisfactory, Spring 2018

District	Math	Reading	Science	Soc. Studies	Writing
Clear Creek	**92.7**	**89.5**	**96.5**	**94**	**89.0**
Conroe	91.5	88.8	96.5	96	88.5
Humble	91.3	86.2	95.5	96	84.0
Katy	93.8	89.5	95.5	86	91.5
Klein	90.2	89.2	96	84	79.5
Leander	94.2	87.7	97	96	71.5
Lewisville	87.5	84.8	93.5	93	76.5
Round Rock	89.8	85.0	94.5	92	77.5
Clear Creek Rank	2nd	1st (tie)	2nd (tie)	4th	2nd

Source: 2018 PBMAS, TEA website.

Table 3-15. STAAR EOC Alternate 2, Percent Satisfactory, Spring 2018

District	Algebra I	Biology	English I	English II	US History
Clear Creek	**93**	**93**	**90**	**100**	**97**
Conroe	91	100	97	93	92
Humble	92	95	86	100	93
Katy	88	92	92	95	89
Klein	84	93	89	94	92
Leander	94	87	100	85	88
Lewisville	75	83	77	87	87
Round Rock	98	100	100	100	94
Clear Creek Rank	3rd	4th	5th	1st (tie)	1st

Source: 2018 PBMAS, TEA website.

Two other indicators that measure how well the district is educating students with disabilities are graduation rate and dropout rate. Table 3-16 shows CCISD's 4-year graduation rate for all students and for students with disabilities. The overall graduation rate has hovered near 97 percent over the past four years, while the graduation rate for students with disabilities has fluctuated, with the lowest rate of 82.3 percent in 2015-16 and the highest rate of 93.1 percent the following year (2016-17).

Table 3-16. CCISD 4-Year Graduation Rate (Grades 9-12), Class of 2013-2017

Year	All Students	Special Education Students
2012-13	95.8	82.4
2013-14	97.0	86.4
2014-15	96.9	88.4
2015-16	97.1	82.3
2016-17	96.8	93.1

Source: Texas Academic Performance Report, TEA Website.

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In 2016-17, only Leander ISD and Lewisville ISD achieved higher graduation rates than CCISD for students with disabilities.

Table 3-17. Special Education 4-Year Graduation Rate (Grades 9-12), Class of 2017

District	Graduation Rate
Leander	96.0
Lewisville	94.1
Clear Creek ISD	**93.1**
Conroe	89.2
Round Rock	86.0
Klein ISD	85.4
Katy ISD	82.5
Humble ISD	82.2

Source: PBMAS, TEA website.

The annual dropout rate for all students (including students with disabilities) in CCISD has been less than 1 percent over the last five years.

Table 3-18. CCISD Annual Dropout Rate (Grades 9-12), 2012-2017

Year	All Students	Special Education Students
2012-13	0.3	0.5
2013-14	0.4	0.9
2014-15	0.0	0.2
2015-16	0.4	0.8
2016-17	0.3	0.5

Source: Texas Academic Performance Report, TEA Website.

In 2016-17, only Round Rock ISD and Leander ISD had lower drop-out rates than CCISD for students with disabilities.

Table 3-19. Special Education Annual Dropout Rate, 2016-17

District	Dropout Rate
Round Rock	0.3
Leander ISD	0.4
Clear Creek ISD	**0.5**
Conroe ISD	0.5
Lewisville ISD	1.4
Humble ISD	1.9
Katy ISD	2.1
Klein	2.9

Source: Texas Academic Performance Report, TEA Website.

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Recommendation 5: Monitor and utilize special education outcomes data to ensure adequate academic and behavioral progress is being made by all students with disabilities.

School systems are responsible for implementing systems, processes, and controls that ensure program compliance and accountability with federal and state requirements, as well as district policy and procedures. The Department of Assessment and Evaluation within CCISD is responsible for analyzing and verifying data received from TEA, creating reports to support campus and district leadership with continuous improvement, and ensuring compliance with all aspects of state and federal accountability.[16]

Reports are generated from two primary systems: *Eduphoria!/AWARE*, a progress monitoring application, and *Skyward*, CCISD's student information system. Every three weeks a progress report is provided to parents and reviewed by the case manager/services facilitator. Every nine-week period students receive report cards/learning progressions along with IEP progress updates. These data are reviewed by teachers and staffing meetings are held if a student is not making academic progress. The District runs *Eduphoria AWARE* data after each STAAR assessment and these data are used to determine student support initiatives in order to prepare for success on subsequent assessments. The instructional specialists share these data with campus staff while program coordinators use state testing data, failure reports, and other data sources to monitor progress and develop Campus Support Plans (CPSs). However, there is not strong evidence that performance indicators to monitor the academic progress of students with disabilities are routinely monitored by program management in a way that would allow for the delivery of services to be adjusted throughout the school year as needed.

Data regarding academic performance of students with disabilities is abundant and includes competency-based assessments, grades, IEP goal progress, and other curriculum measures. Six schools also utilize a growth measure assessment, the NWEA Measurement of Academic Progress (MAP). Growth measures provide targeted information helping district and campus staff determine the value-added by specific instructional programs and practices and should be considered for all schools. It is incumbent upon district leaders to not only collect performance data for students with disabilities but also to analyze the data in a meaningful fashion and then disseminate the analysis to those who are responsible for making instructional decisions.

Continual use of data produced by a powerful learning management system would enable performance data to be disaggregated in useable formats to inform decisions, particularly relating to accelerating academic performance of students with disabilities. Currently, *Eduphoria!/AWARE* reports such as the one below can be generated to indicate state assessment scores, curriculum-based assessment performance, and benchmark data. The reports provide excellent progress-monitoring data and it will be important for the District to utilize the powerful analytics of this system as well as others to analyze performance data and to drive instructional decisions that are made. It did not appear from interviews with program management that these types of data are routinely analyzed and used to drive instructional programming decisions.

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[16] https://www.ccisd.net/departments/assessment___evaluation

Figure 3-13. Example Eduphoria!/AWARE Report
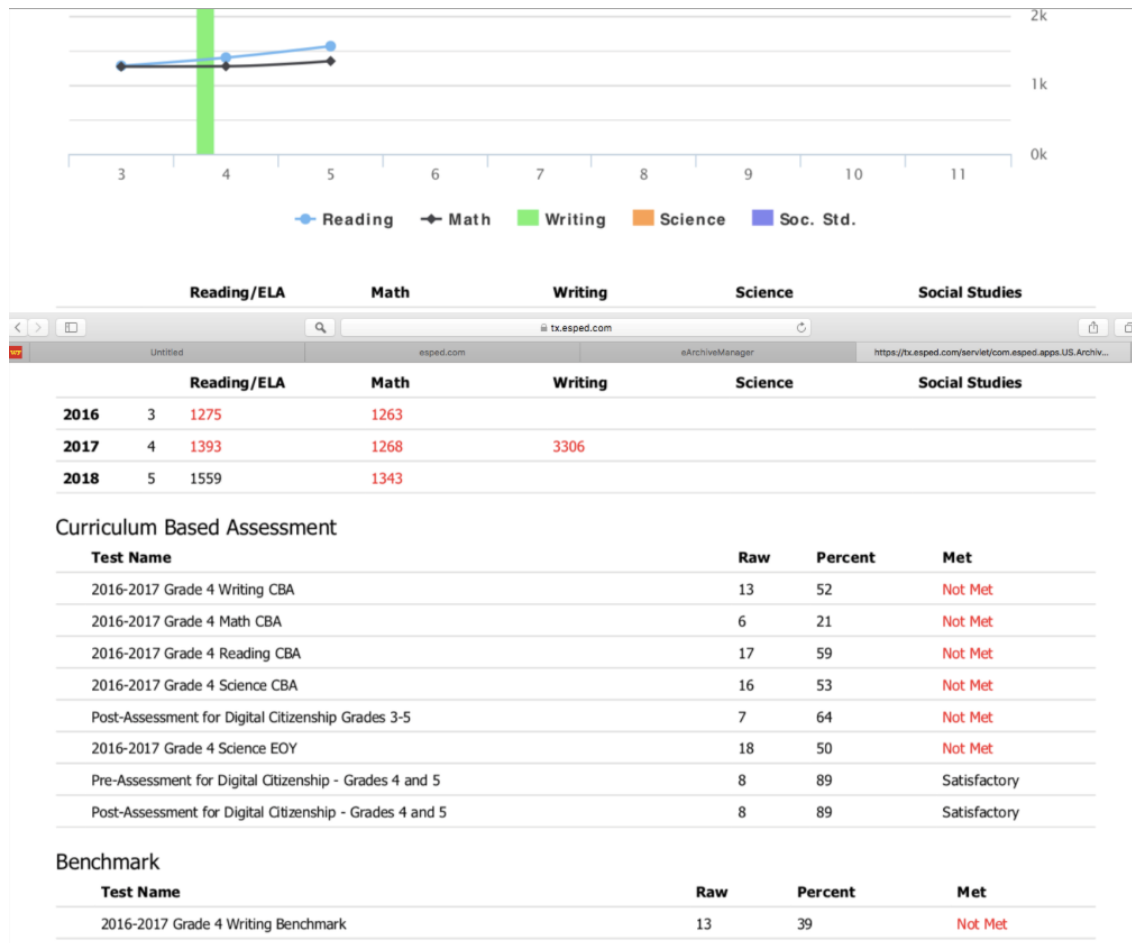
Source: CCISD.

Recommendation 6: Incorporate Campus Support Plans into each campuses' school improvement plan.

Special education instructional specialists meet annually with each campus' principal or assistant principal and special education team leaders to develop a CSP, which is plan that specifies the type of support the campus needs to provide better outcomes for students with disabilities. CSPs include campus-specific goals, action steps to accomplish each goal, individual responsible for each action, implementation timeline, and the progress monitoring approach.

While CSPs can be an effective management tool, it was not apparent during interviews that all campus administrators had strong ownership in their plans; some principals recognized their value while others did not understand what the plans were. While important, the CSPs do not appear to serve as a driver for improvement efforts to achieve improved academic and behavioral outcomes for students with disabilities.

To strengthen the linkage between the Campus Improvement Plans (CIPs) and the CSP, District leadership should set an expectation that the goals in the CSPs be aligned with school improvement goals. This

consolidation of documents will signal to all an intent for the entire school community to work together to develop, monitor, and evaluate achievement and behavioral results for students with disabilities in the same manner as for students who are not disabled.

Recommendation 7: Ensure classroom walkthroughs are focused on specific District and/or campus improvement efforts.

Classroom walkthrough instruments have been developed by CCISD special education staff for all specialized programs to assist principals and other administrators in supporting teachers and improving instructional practices. These instruments are used by special education instructional specialists to analyze the classroom learning environment, the teacher-paraprofessional communication, instruction, IEPs and lesson plans, and behavior management. Instructional specialists share findings with principals and special education coordinators; feedback is also shared with teachers to improve instructional and behavioral strategies. The department has provided training for principals on indicators of quality instruction for students with disabilities, there was no evidence that classroom walkthroughs are connected to specific school or district improvement practices. When walkthroughs are disconnected from larger improvement efforts, teachers tend to dismiss them and to lose confidence in their purpose and value. Conversely, carefully designed walkthroughs can support the development of shared understanding of high-quality practice, the creation of a common language, and the communication of district priorities.[17]

To utilize classroom walkthroughs effectively, observers should decide in advance what they will focus on, what evidence they will collect, and how they will make sense of it. Well-designed, focused classroom walkthroughs provide firsthand classroom observations that can paint a picture to inform larger improvement efforts. For example, walkthroughs might be focused on a few high-yield instructional strategies or instructional delivery models if these are initiatives the Special Services Department is prioritizing. Data from walkthroughs could be captured digitally (best practice), but is not required.

Recommendation 8: Set expectations for both general education and special education staff to participate in joint learning walks to improve instructional practices across all classrooms within schools.

A learning walk is a brief classroom visit utilizing a researched-based tool that provides principals and teachers opportunities to reflect on what students are learning, learning strategies, student interaction with the content, and student engagement. According to consensus feedback provided during interviews, there is very little coordination and collaboration between teacher coaching provided by special education instructional specialists and that provided by general education instructional coaches (although it does happen on occasion). One way to improve this is to ensure that learning walks include all program staff

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[17] Coburn, C. E., Honig, M. I., & Stein, M. K. (in press). What is the evidence on districts' use of evidence? In J. Bransford, L. Gomez, D. Lam, & N. Vye (Eds.), *Research and practice: Towards a reconciliation*. Cambridge, MA: Harvard Education Press.

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whenever possible.

Expectations for Learning Walks within the Department of Instruction include:

- Vertical, cross-curricular, and instructional teams conduct learning walks

- Principals participate in learning walks on peer campuses

- Two focus areas should be determined for learning walks

Gibson recommends that the expectations for learning walks be modified to include special education instructional specialists and other program staff whenever possible. The resulting collaboration between instructional coaches and instructional specialists will foster a better understanding of the demands of the general education curriculum for instructional specialists and instructional coaches will develop a better understanding of accommodations and instructional practices needed by students with disabilities. Coordinated learning walks are especially beneficial for inclusive settings where general education and special education staff are working collaboratively to serve students with disabilities. An additional benefit will be that teachers receive feedback that is calibrated by the diverse learning walk team and are not overwhelmed by feedback from multiple sources.
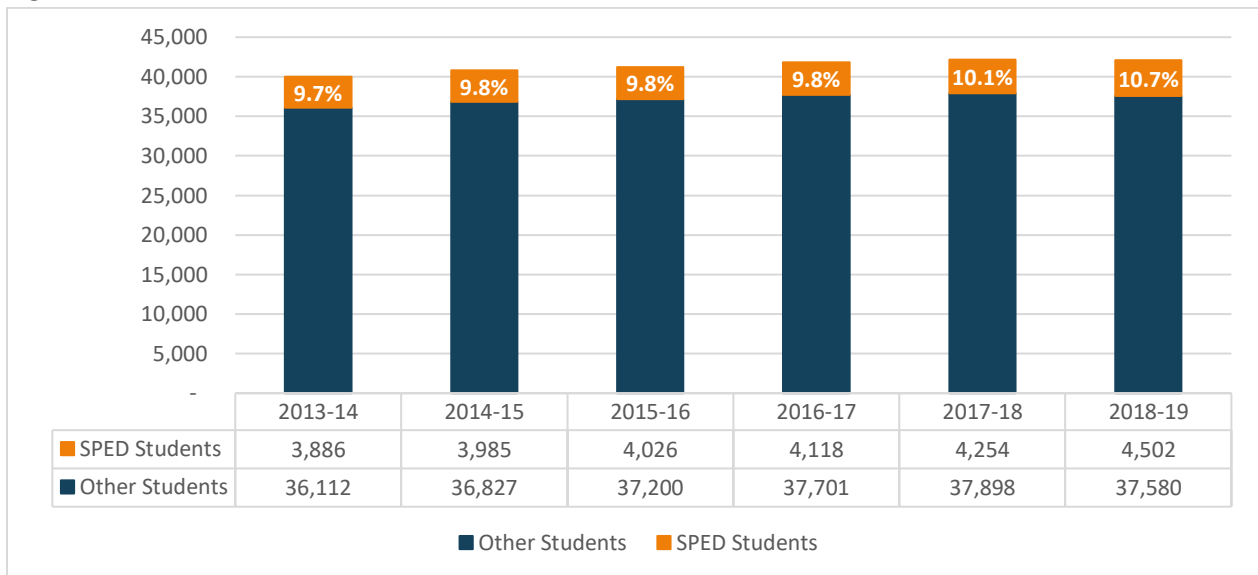
IV. Program Service Delivery

This chapter examines Clear Creek ISD's (CCISD/the District) special education program service delivery framework through the lens of student enrollment and representation, Response to Intervention (RtI), specialized programs, curriculum and instructional practices, and student discipline.

Student Enrollment and Representation

CCISD student enrollment increased by 5.2 percent over the past six years (see Figure 4-1). However, special education student enrollment has grown at a much faster rate, increasing 15.9 percent over this same time period. The largest increase in special education enrollment occurred between 2017-18 and 2018-19.

Figure 4-1. CCISD Enrollment, 2013-14 to 2018-19*

|	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
SPED Students	3,886	3,985	4,026	4,118	4,254	4,502
Other Students	36,112	36,827	37,200	37,701	37,898	37,580

Source: Texas Education Agency (TEA), Public Education Information Management System (PEIMS) Standard Reports (Enrollment by Population Reports).
Note: *2018-19 data provided by CCISD Special Services Department.

In 2017-18, the most recent comparison year available, the percentage of students receiving special education services in CCISD was 10.1 percent – which was above the statewide average of 9.2 percent and below the national average of 13 percent.[18] Clear Creek ISD has a higher percentage of students participating in the special education program than four of the seven benchmark districts.

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[18] Texas Education Agency, 2017-18 PEIMS Standard Reports and TEA Special Education Strategic Plan, 2018.

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Figure 4-2. Special Education Enrollment as a Percent of Total District Enrollment, 2017-18
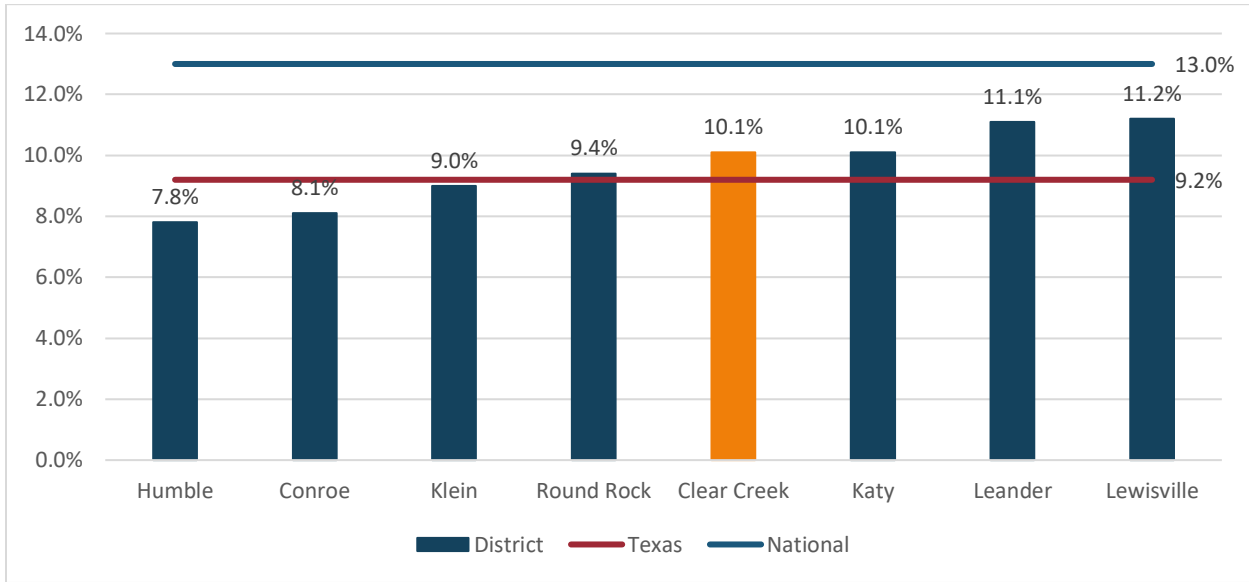
Source: Texas Education Agency (TEA), PEIMS Standard Reports (Enrollment by Population Reports).

The Individuals with Disabilities Education Act (IDEA) lists 13 different disability categories under which children ages 3 through 21 can qualify for special education services. Table 4-1 compares the percentage of CCISD special education students by primary disability category to the benchmark district and state averages. CCISD has a higher percentage of students with disabilities with other health impairment (OHI) than the state average (18.0 percent compared to 14.1 percent); CCISD's incidence rates by other primary disabilities are in line with the state average. Compared to benchmark districts, however, CCISD has lower rates of autism (12.9 percent compared to 17.3 percent), emotional disturbance (4.3 percent compared to 7.2 percent), and higher rates of OHI (18.0 percent compared to 15.9 percent), intellectual disability (10.1 percent compared to 7.5 percent), and speech impairment (20.2 percent compared to 18.4 percent).

Table 4-1. Percentage of Special Education Enrollment by Primary Disability, 2017-18

Primary Disability	CCISD	Benchmark District Average	State Average
01 – Orthopedic Impairment	0.8%	0.6%	0.7%
02 – Other Health Impairment	18.0%	15.9%	14.1%
03 – Auditory Impairment	2.0%	1.3%	1.4%
04 – Visual Impairment	0.5%	0.7%	0.8%
05 – Deaf-Blind	0.0%	0.1%	0.1%
06 – Intellectual Disability	10.1%	7.5%	10.6%
07 – Emotional Disturbance	4.3%	7.2%	5.8%
08 – Learning Disability	30.0%	29.0%	31.7%
09 – Speech Impairment	20.2%	18.4%	20.2%
10 – Autism	12.9%	17.3%	13.0%
12 – Developmental Delay	0.0%	0.0%	0.0%
13 – Traumatic Brain Injury	0.1%	0.2%	0.3%
14 – Noncategorical Early Childhood	1.2%	1.7%	1.4%

Source: Texas Education Agency (TEA), PEIMS Standard Reports (Enrollment by Disability Report, 2017-18).

Disproportionality

Under Part B of IDEA, states must collect and examine data to determine whether significant disproportionality on the basis of race and ethnicity is occurring in the state, or its school districts, with respect to the identification, placement, and discipline of students with disabilities. To ensure compliance with this provision of IDEA, the United States Department of Education now requires all states to use a standard methodology to identify significant disproportionality. Under this new standard approach, states must analyze racial and ethnic disparities using a risk ratio and then select a reasonable risk ratio threshold to determine when racial and ethnic disparities have become significant.[19]

Risk ratios show how the risk for one racial/ethnic group compares to the risk for a comparison group. A risk ratio greater than 1.0 for a racial/ethnic group indicates overrepresentation, while a risk ratio less than 1.0 indicates underrepresentation. States are allowed to determine the thresholds for the risk ratio number that will be used to assign significant disproportionality.[20] For students with disabilities by race or ethnicity by specific disability (Indicator 10), a risk ratio of +7.34 is considered to be significantly disproportionate for reporting purposes.[21]

Table 4-2 includes CCISD's disproportionality results for Indicator 9 from 2013-14 to 2016-17. Since 2013-14, the risk ratios for African American and Two or More Races students have improved, moving closer to 1.0. The risk ratios for Asian and Hispanic students have increased over that time period and the risk ratio

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[19] *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, US Department of Education, February 2016.

[20] TEA, Indicator 9 Methodology, 2018

[21] TEA, Indicator 10 Methodology, 2018

of White students has remained largely the same. No subgroup has a risk ratio that exceeds +11.95, thus there is not a significant level of disproportionality for state reporting purposes. However, it is apparent that over/under representation for some subgroups does exist. In Table 4-2, the cells highlighted in blue indicate a potential overrepresentation, while those highlighted in orange indicate a potential underrepresentation.

Table 4-2. Indicator 9 Disproportionality Calculations, 2013-14 to 2016-17

Race or Ethnicity	2014	2015	2016	2017
African American	4.87	4.94	4.05	4.54
Asian	-4.14	-5.80	-2.12	-2.87
Hispanic	2.82	2.82	3.14	2.65
Two or More Races	-1.21	-1.08	-0.54	-0.85
White	-1.68	-1.88	-1.79	-1.63

Source: CCISD student level enrollment data, 2013-17. Calculated by Gibson Consulting Group, Inc. utilizing the formula promulgated by TEA in "Indicator 9 Methodology".

Potential disproportionality for Indicator 10 is present (see Table 4-3), though not considered significant by the state. Cells highlighted in blue indicate a potential overrepresentation, while those highlighted in orange indicate a potential underrepresentation; cells highlighted gray did not have a large enough student population to calculate disproportionality.

Table 4-3. Indicator 10 Disproportionality Calculations, 2017-18

Primary Disability	African American	Asian	Hispanic	Two or More Races	White
01 – Orthopedic Impairment	0.09	1.64	-0.50	-0.78	0.25
02 – Other Health Impairment	-2.95	-10.74	-4.20	5.95	6.53
03 – Auditory Impairment	0.10	0.32	1.14	-0.32	-1.11
04 – Visual Impairment	0.15	-0.52	-7.91	0.07	-0.17
05 – Deaf-Blind	*	*	*	*	*
06 – Intellectual Disability	8.33	4.89	1.39	-4.06	-5.18
07 – Emotional Disturbance	1.73	-3.08	-2.63	-0.95	2.47
08 – Learning Disability	4.70	-14.13	10.52	-0.64	-9.18
09 – Speech Impairment	-9.82	2.54	-0.80	0.77	4.31
10 – Autism	-2.07	18.01	-4.91	-0.47	2.13
12 – Developmental Delay	*	*	*	*	*
13 – Traumatic Brain Injury	*	*	*	*	*
14 – Noncategorical Early Childhood	-0.36	0.73	-0.03	0.57	-0.05

Source: CCISD student level enrollment data, 2017-18. Calculated by Gibson Consulting Group, Inc. utilizing the formula promulgated by TEA in "Indicator 10 Methodology".

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Recommendation 9: Actively track and monitor disproportionality data to determine the efficacy of current approaches.

To address the potential disproportionate representation of some subgroups in special education, the Special Services Department provides annual cultural awareness training and utilizes Culture-language Interpretive Matrices (CLIM), a tool used during evaluations to assess the impact of language proficiency and acculturative learning opportunities on standardized test scores for individual students. Program leadership clearly communicated that disallowing ethnicity or race to influence program eligibility or primary disability determination is a priority. However, the review team noted through multiple interviews and requests for data that program management is not routinely tracking the disproportionate representation of special education students by ethnicity or by disability. The only meaningful way to track the efficacy of the District's current approach to disproportionality is to implement systems and processes to routinely calculate and monitor risk ratios, both district-wide and at the campus level. Other strategies to mitigate the over- or under-representation of some subgroups in special education include:

- Having an effective RtI model where interventions are implemented with fidelity;

- Ensuring an effective Child Find process;

- Utilizing unbiased assessments to determine student's abilities;

- Providing targeted professional development to both special and general education teachers and evaluation staff; and,

- Providing technical assistance to campuses that show consistently skewed risk ratios, and including this information on all Campus Support Plans.

Response to Intervention

Response to Intervention is a multi-tiered approach to the early identification and support of students with learning and behavior needs. It is not a roadmap to special education services for students who are struggling, but rather a pre-referral intervention strategy and a proactive system of support for all learners. RtI operates on a continuum and the key is finding the level at which a student responds to an intervention. The RtI process begins with high quality instruction and universal screening of all students in the general education classroom. This multi-tiered system of supports (MTSS) provides access to increasingly intense levels, or tiers, of instruction and interventions driven by data-based decision making. According to CCISD's *Response to Intervention and Student Success Team Procedures*, the three tiers of intervention can be summarized as follows:

- **Tier 1:** Instruction occurs in the general education classroom and is based upon a teacher's analysis of individual students' strengths and needs within the context of the written curriculum and the classroom environment. This level of instruction will meet the needs of approximately 80 percent of students.

- **Tier 2:** Instruction involves supplemental, student centered, and individualized instruction, which could occur during the regular instructional day or outside of normal instructional hours.

Instruction is designed to meet the needs of students that require more targeted interventions than available in Tier 1. Curriculum-based assessments are used to identify specific problem areas, and more individualized strategies and research-based interventions are implemented in this tier. Student progress is monitored frequently and systematic assessments are conducted to determine the effectiveness of the intervention. Tier 2 addresses the needs of approximately 15 percent of the students.

- **Tier 3:** Instruction serves students with the greatest need. Procedures are consistent with those in Tier 2, though the intensity and frequency of interventions are higher. Tier 3 addresses the needs of approximately 5 percent of the students.

The RtI process at CCISD is overseen by the Department of Instruction and is implemented through campus-based Student Success Teams (SSTs), whose members include the campus principal, the referring teacher, a general education teacher (if not the referring teacher), an intervention teacher, and other staff knowledgeable about assessment and documentation. Referral to the SST should occur only after the classroom teacher has tried a variety of interventions in the classroom and concerns continue. After a referral is received, members of the SST convene to address student performance concerns, review student data, develop a plan for improvement, monitor progress, and adjust plans to ensure student success. The objective of the SST meeting is to create a recommended RtI plan, including the type of intervention(s) needed, frequency of the intervention(s), define expected progress, and assign responsibility. Progress monitoring and tracking of student interventions is currently maintained in Skyward (RtI module).

Recommendation 10: Routinely track and monitor RtI data to identify campuses that require additional support.

Figure 4-3 shows the percent of students in RtI Tier 2 and Tier 3 (Reading, Math and Behavior) by elementary school in the beginning of 2018-19, which ranged from 0.4 percent at McWhirter Elementary to 18.6 percent at Whitcomb Elementary. The average percent of students across elementary schools in Tier 2 was 4.5 percent, and the average in Tier 3 was 1.8 percent. These overall percentages are well below the District's own guidelines and the wide variation in percentages across schools is a reliable indicator of inconsistent RtI practices district-wide.
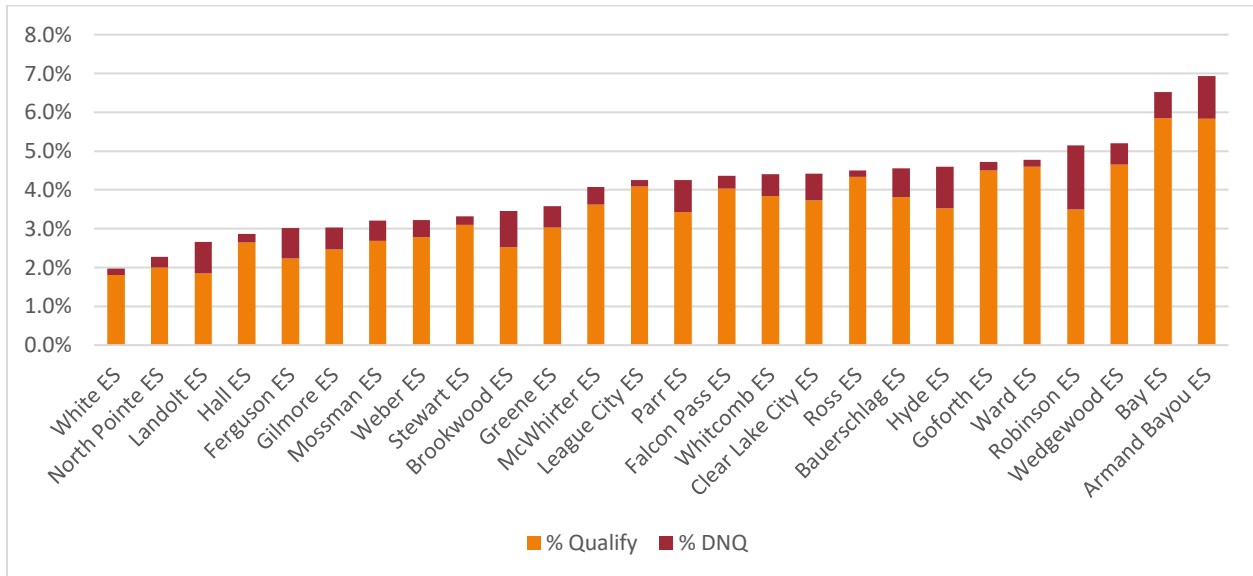
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Figure 4-3. Percent of Students in RtI Tier 2 and Tier 3 Reading, Math and Behavior by Elementary Campus, 2018-19
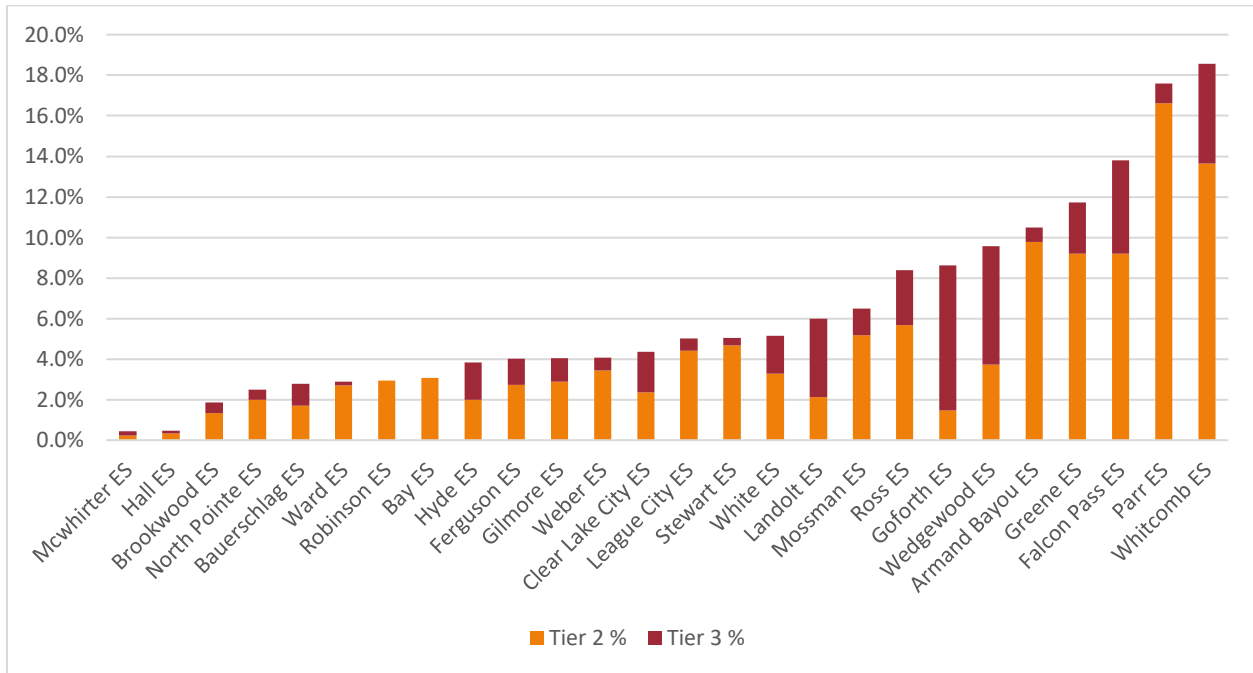
Source: RTI Student Data provided by CCISD, October 2018.

Figure 4-4 shows the percent of elementary students referred to special education as well as the percent of referrals that do not qualify (DNQ) by campus in 2017-18. Referral rates ranged from 2 percent at White Elementary to 6.9 percent at Armand Bayou Elementary, with an average referral rate of 4 percent across all elementary schools. DNQ rates ranged from 3.6 percent at Ross Elementary to 32 percent at Robinson Elementary, with an average DNQ rate of 14 percent across all elementary schools. Wide variations in referral and DNQ rates across campuses is another important indicator of inconsistent RtI practices and program effectiveness district-wide. For example, low DNQ rates may indicate that every attempt has been made to support students through RtI and so a referral to special education is appropriate, whereas high DNQ rates may indicate that needed interventions are not being fully implemented prior to a referral to special education.

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Figure 4-4. Percent of Students Referred to Special Education and Percent of Qualifying Referrals by Elementary Campus, 2017-18

Source: CCISD Special Services Department.

Gibson Consulting Group's (Gibson) analysis of CCISD's RtI data suggests that some schools continue to struggle with fully implementing all key components of RtI that are critical to an effective and equitable early intervention program. CCISD should further evaluate whether the following RtI best practices are consistently implemented at each campus:

- Progress monitoring assessments are frequent, quick and skill-specific and resulting data are analyzed deeply and precisely (by general education teachers and SSTs) to inform focused intervention planning.

- Evidenced-based instructional strategies guide teachers and schools in planning and delivering core and intervention instruction that is based on well-established best practices for increasing student learning and proficiency.

- Each tier of intervention is provided *in addition to* the other tiers and school schedules and staffing accommodate the extra instructional time required (e.g., students should not be removed from core classroom instruction for an intervention lesson).

To monitor the fidelity with which campuses are implementing these RtI best practices, the Department of Instruction should ensure that all student intervention data are appropriately entered into *Skyward RtI*. The department should then systematically monitor campus-level data (including exit data) to determine the overall effectiveness of the District's instructional and intervention programs and to identify which campuses (and subsequently teachers) need additional training and support in improving their instructional skills and RtI processes.

Instructional Setting and Least Restrictive Environment

Special education services are provided in a variety of instructional settings and federal law requires that districts educate students in the least restrictive environment (LRE) alongside their nondisabled peers to the maximum extent possible. Special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occurs only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily. Instructional settings are based on the percentage of time or number of periods that a student receives direct, regularly scheduled special education services as required by their Individualized Education Program (IEP), and all students receiving special education services must have an instructional setting code.[22] Instructional settings include:

- **No Instructional Setting** – When a special education setting is not appropriate, but special services are required, such as speech therapy or special transportation.

- **Mainstream** – For students whose instruction and related services are provided in the regular education classroom with special education support.

- **Resource Room** – For eligible students who need special education instruction and related services in a setting other than regular education for less than 50 percent of the student's day. This includes Content Mastery services that serve students with and without disabilities.

- **Self-Contained** – For students who need special education instruction and related services for 50 percent or more of the student's school day on the regular school campus.

- **Other Settings**

    - **Vocational Adjustment Class (VAC)** – For students who are placed on a job with regularly scheduled supervision by special education teachers. This applies to full- or part-time job training/employment, as documented in a student's IEP.

    - **Homebound** – For eligible students who are medically unable to attend school at the campus.

    - **Hospital Class** – For students in a classroom in a hospital facility or an approved residential care and treatment facility not operated by the school district.

    - **Off Home Campus** – This instructional arrangement/setting is for providing special education and related services to the following: 1) a student who is one of a group of students from more than one school district served in a single location when a free appropriate public education is not available in the respective sending district; 2) a student whose instruction is provided by school district personnel in a facility (other than a nonpublic day school) not operated by a school district; or 3) a student in a self-

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[22] TEA Chapter 89.63 Instructional Arrangements and Settings, Adaptions for Special Education, Subchapter D Special Education Services and Settings.

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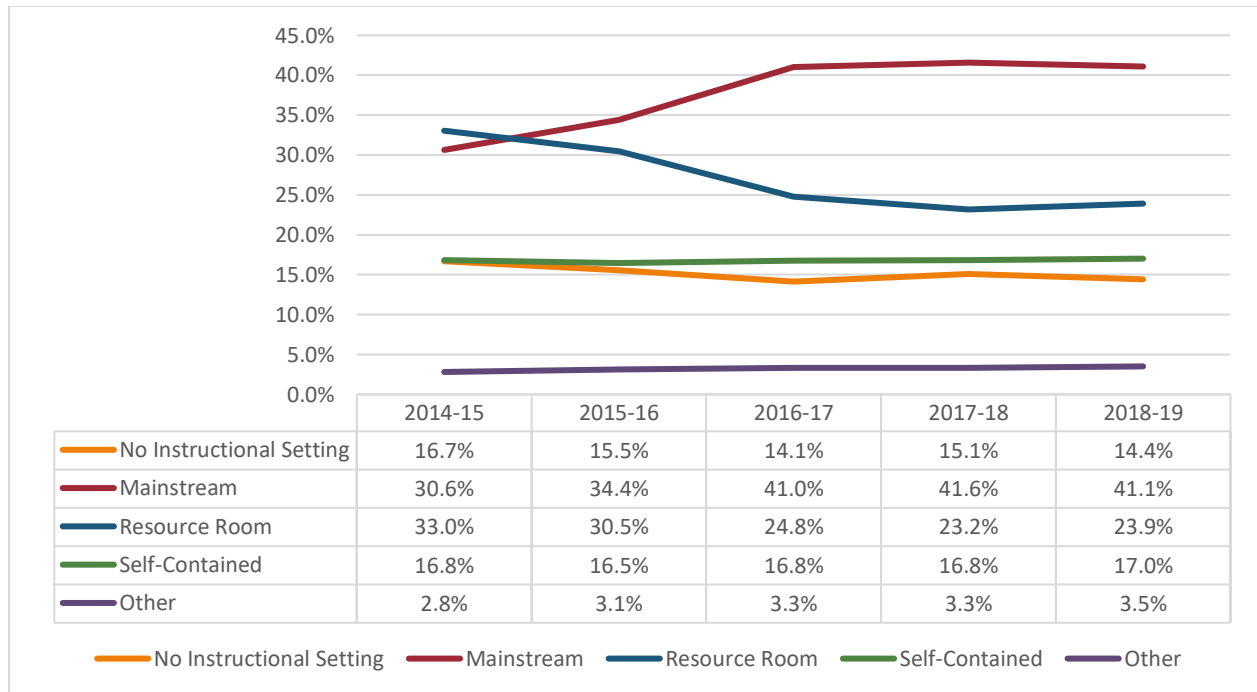AN EDUCATION CONSULTING & RESEARCH GROUP

contained program at a separate campus operated by the school district that provides only special education and related services.

- **Residential Care and Treatment Facility –** For non-school district students who reside in approved care and treatment facilities within school district boundaries, but whose parents do not reside within the boundaries of the school district. This includes students living in licensed foster homes.

Program Strength: Special education students are being served in more inclusive settings.

Figure 4-5 shows the percentage of students in CCISD receiving special education services by instructional setting from 2014-15 to 2018-19. Data from the past 5 years indicates that special education students are educated more frequently in a mainstream setting (41.1% compared to 30.6%) than in a resource setting (23.9% compared to 33.0%). This is notable because there is a strong research base that shows that students with disabilities who are educated in inclusive classrooms show academic gains in a number of areas, including improved performance on standardized tests and mastery of IEP goals, among other things.[23] The percent of students educated in a self-contained setting remained relatively unchanged (17.0% compared to 16.8%) over this time period.

Figure 4-5. CCISD Percentage of Special Education Enrollment by Instructional Setting/Arrangement, 2014-15 to 2018-19
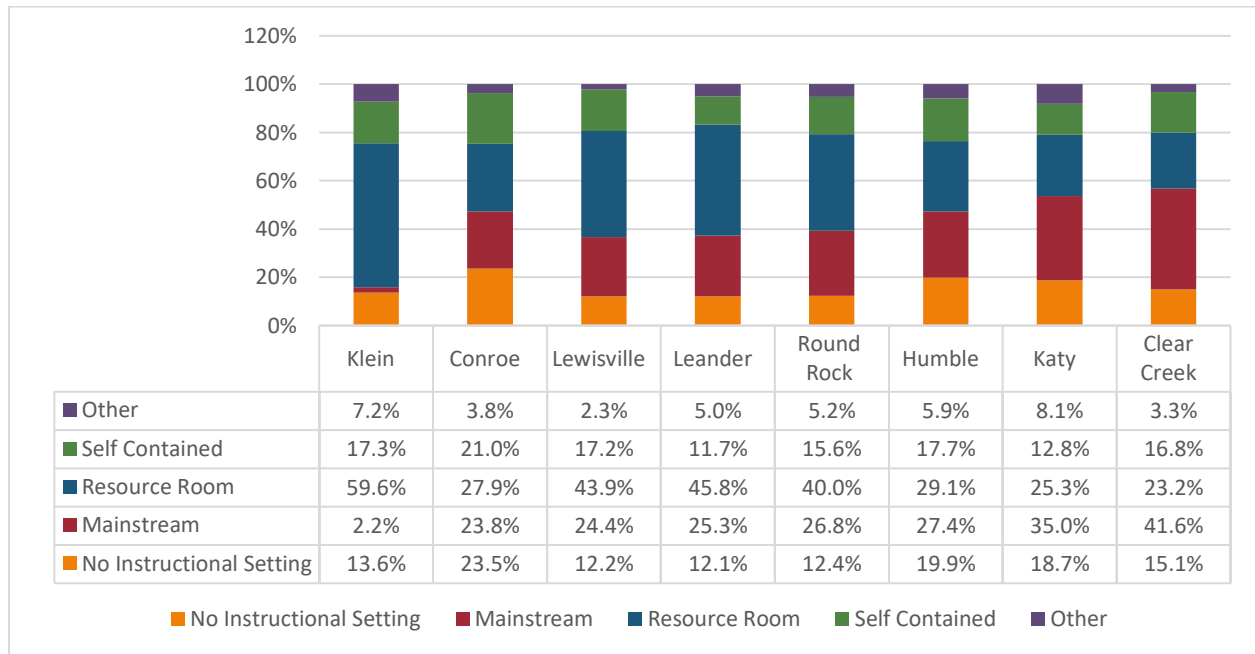

	2014-15	2015-16	2016-17	2017-18	2018-19
No Instructional Setting	16.7%	15.5%	14.1%	15.1%	14.4%
Mainstream	30.6%	34.4%	41.0%	41.6%	41.1%
Resource Room	33.0%	30.5%	24.8%	23.2%	23.9%
Self-Contained	16.8%	16.5%	16.8%	16.8%	17.0%
Other	2.8%	3.1%	3.3%	3.3%	3.5%

Source: CCISD Special Services Department.

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[23] https://www.wrightslaw.com

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Compared to benchmark districts, CCISD has the highest percentage of students in a mainstream setting and the lowest percentage of students in a resource room setting.

Figure 4-6. Percent of Special Education Enrollment by Instructional Setting/Arrangement, 2017-18

	Klein	Conroe	Lewisville	Leander	Round Rock	Humble	Katy	Clear Creek
■ Other	7.2%	3.8%	2.3%	5.0%	5.2%	5.9%	8.1%	3.3%
■ Self Contained	17.3%	21.0%	17.2%	11.7%	15.6%	17.7%	12.8%	16.8%
■ Resource Room	59.6%	27.9%	43.9%	45.8%	40.0%	29.1%	25.3%	23.2%
■ Mainstream	2.2%	23.8%	24.4%	25.3%	26.8%	27.4%	35.0%	41.6%
■ No Instructional Setting	13.6%	23.5%	12.2%	12.1%	12.4%	19.9%	18.7%	15.1%

■ No Instructional Setting   ■ Mainstream   ■ Resource Room   ■ Self Contained   ■ Other

Source: Texas Education Agency, Public information request submitted for 2017-18 PEIMS data.

As shown in Table 4-4, the trend toward more inclusion was most significant for students with a primary disability of intellectual disability (ID) and learning disability (LD), but increased more than 10 percentage points for other disabilities as well. These data are a reflection of a concerted effort by district leadership to increase inclusionary practices by shifting from a "pull-out" model where students are served in resource rooms to an inclusive model where students are provided in-class supports in the general education classroom.

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Table 4-4. Percent of Students in Mainstream Setting by Primary Disability, 2012-13 and 2017-18

Primary Disability	2013-14	2017-18	% Δ
Auditory impairment	11.6%	10.6%	-1.0%
Autism	24.0%	25.4%	1.3%
Deaf-blind	21.1%	27.9%	6.8%
Emotional disturbance	1.2%	3.0%	1.8%
Intellectual disability	52.8%	71.2%	18.5%
Learning disability	2.4%	28.6%	26.1%
Noncategorical early childhood	13.3%	21.9%	8.5%
Orthopedic impairment	47.8%	60.6%	12.9%
Other health impairment	4.6%	18.1%	13.5%
Speech impairment	14.3%	25.0%	10.7%
Traumatic brain injury	33.3%	28.6%	-4.8%
Visual impairment	11.6%	10.6%	-1.0%

Source: CCISD Special Services Department.

Individualized Education Program

All children with disabilities, regardless of the type or severity of disability, have a right to a free and appropriate public education (FAPE) at public expense. An important part of the FAPE requirement is an IEP for each student. The IEP is a multidisciplinary, team-developed plan required for every child receiving special education services under Part B of the IDEA. It is an "educational map" for students with disabilities and must articulate the student's unique needs, present levels of performance, measurable goals and objectives, and a description of the special education and related services that will be provided so that the child can meet his or her goals and learning objectives.

As part of this special education program review, Gibson conducted a detailed review of a sample of IEPs to assess whether or not they are compliant, of high quality, and follow best practice standards. *Appendix B – Individualized Education Program File Review* contains a description of Gibson's review methodology and detailed results. Areas of strength and improvement opportunities resulting from the IEP file review are discussed below.

Program Strength: Transition plans were generally well-written, comprehensive, and included all key components.

State Performance Plan (SPP) Indicator 13 monitors the percentage of youth with IEPs aged 16 and above with an IEP that includes: appropriate measurable postsecondary goals that are annually updated based upon age appropriate transition assessment; transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals; and, annual IEP goals related to the student's transition service needs. CCISD is in compliance with SPP Indicator 13 and the IEP files examined for purposes of this review were exemplary in covering transition requirements.

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Recommendation 11: Require the use of the *Extended School Year Services Consideration and Decision-Making Guide* by Admission, Review, and Dismissal committee.

Extended School Year (ESY) in CCISD is provided during the summer for students with disabilities when the need is determined through the Admission, Review and Dismissal (ARD) committee. Students who may need educational programming beyond the regular school year are those whose measured educational performance on IEP goals and objectives demonstrates a pattern of significant regression combined with excessive time for academic recuperation when an extended break in service occurs. It is the responsibility of the ARD committee to review data gathered and determine services needed during ESY on an annual basis.

Analysis of district data shows that the percentage of students receiving ESY is low and has decreased over the past five years, despite a steady percentage of students in self-contained settings who are most at risk of regression and are likely to require these services. Discussions with program management suggest that many affluent and other families of eligible students sometimes decline these services in lieu of other summer opportunities.

Table 4-5. Percent of SPED Students in ESY, 2013-14 to 2017-18

SPED Students	2013-14	2014-15	2015-16	2016-17	2017-18
Total ESY	138	158	125	101	107
Total SPED Students	3,884	3,983	4,021	4,114	4,249
% ESY	3.6%	4.0%	3.1%	2.5%	2.5%

Source: CCISD Special Services Department.

Sound data and information collection practices are particularly important for students with severe disabilities since their progress may be measurable only in minute steps. The need for ESY should focus on what services are necessary in order for the student to be able to maintain skills and continue to make educational progress when the school year resumes.

The District has created a well-designed tool, the *Extended School Year Services Consideration and Decision-Making Guide*, but feedback provided during interviews and focus group sessions suggest that this guide is not consistently utilized. In light of the low and decreasing number of students served in ESY, Gibson recommends that the department require the use of this tool for ARDs and then post the guide to *eSPED* as a part of the annual ARD. It is important for the District to document a parent's refusal of ESY services when the remainder of the ARD committee is recommending them.

Recommendation 12: Use more advanced assistive technology devices to better support student needs.

Based on detailed review of IEPs, classroom observations, and feedback provided during interviews and focus groups, ARD committees appear to consider primarily low-tech (Level 1) assistive technology (AT) device options for students, such as communication boards, multiplication charts, graphic organizers, calculators, checklists, and adaptive paper. Low-tech assistive technology devices include equipment and or services that are basic in nature, require very little training in terms of use, and are inexpensive and readily available.

As the selection of digital tools has increased, more medium and high technology (Levels 2 and 3) assistive technology is available and should be used to maximize student independence and access. Examples of medium and high technologies include, but are not limited to:

- Augmentative and alternative communication devices such as speech generating devices

- Memory aids such as Smartpens

- Text readers

- Notetakers

- Text enlargers

- Digital organizational tools

- Word prediction software

- Talking word processors

- Tablet or computers

- Switches

- Auditory feedback while keyboarding

- Speech to text and text to speech functionality

- Font modification

- Grid-based software

Providing additional options for assistive technology for students with disabilities will foster greater access to the general education curriculum and will enable students to learn developmentally appropriate skills in an authentic manner. Additionally, higher-tech AT devices can assist students in gaining more independence regardless of their limitations. Mid-tech and high-tech devices, however, tend to be more expensive and generally require more student and staff training to operate. Department leadership should ensure that campus and district staff are familiar with the wide variety of assistive technology available. The decision on assistive technology should be based on student need and data collected through trials.

Recommendation 13: Reinforce the connection between Present Levels of Academic and Functional Performance statements and IEP goals through more targeted professional development.

More than a third of the student IEP files reviewed had Present Levels of Academic and Functional Performance (PLAAFP) statements that did not include measurable data and, as a result, many of those files also had IEP goals that were missing important details. IEP goals must be based on measures found in the PLAAFP and should map a plan for students to progress in academic, motor, social, and behavioral areas. Lack of data from evaluations, classroom assessments, and/or formal standards-based testing in the PLAAFP prohibits ARD committees from writing meaningful goals.

Recommendation 14: Prioritize accommodations provided to students with disabilities and limit them to a few that are critical and manageable to ensure that they are consistently implemented and their impact can be measured.

Accommodations refer to adjustments in the conditions of learning or performing on tests that are appropriate or necessary given the special needs of the student. Accommodations can include changes in the presentation of a lesson, instructional strategies, student response format and procedures, time and scheduling, environment, equipment, etc. Accommodations do not substantially change the instructional level, content, or performance criteria.

Gibson's IEP file review found that the number of accommodations provided to students in many cases appeared to be excessive – some students had up to 22 accommodations. Special education student achievement depends on accommodations being implemented with fidelity on a regular basis. Overidentification of accommodations for students can distract from and/or hinder students' academic success.[24] ARD committees should consider limiting the number of accommodations provided to students in order to ensure that they are implemented consistently and that records are maintained to quantify sustainability of appropriate accommodations.

Recommendation 15: Ensure that all students whose behavior interferes with their learning have a Behavior Intervention Plan.

A review of student IEPs found that some students with significant documented behavioral problems did not have a Behavior Intervention Plan (BIP), which is a written plan of action for improving difficult behavior that is inhibiting a student's academic success. If a child's behavior disrupts the classroom and significantly interrupts his or her education, then this needs to be addressed in the IEP.[25] It is unclear whether or not the high caseloads and recent turnover of Licensed Specialists in School Psychology (LSSPs), who are responsible for writing BIPs, is a contributing factor. If so, consideration should be given to enabling other special education staff to write BIPs as federal law does not require that a LSSP or a psychologist write the BIP. Although a system of tiered levels of support for students with behavioral issues is utilized in CCISD, without the presence of a BIP and appropriate tracking of progress toward goals, it is difficult if not impossible to determine if students are making progress and, if not, how to support them differently. Students who are served in the Positive Approach to Student Success program are an exception as that particular program has a specific tracking method built into the program.

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[24] Ketterlin-Geller, L.R., Alonzo, J., Braun- Monegan, J. & Tindal, G. (2007). Recommendations for accommodations: implications of (in)consistency. *Remedial and Special Education,* 28(4) p. 194-205.

[25] https://www.thoughtco.com/bip-behavior-intervention-plan-3110966

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Checking for ongoing, unresolved behavioral issues should become a component of the internal IEP file review to ensure that measures are being taken to identify and address persistent inappropriate behaviors that interfere with students' educational progress.

Specialized Instructional Programs

As part of its full continuum of services, CCISD offers a variety of specialized programs for students who require a highly structured environment and intensive instruction in specific areas. They include:

- **Preschool Program for Children with Disabilities (PPCD)** – Eligible children with disabilities between the ages of 3 to 5 receive services in a variety of settings such as pre-kindergarten and self-contained classrooms or in community settings such as Head Start and preschool.

- **Alternative Academics (AA)** – This program is designed to give students with cognitive disabilities a curriculum that encompasses functional and academic skills for communication, social, vocational, and independent living skills to support post-secondary goals. Students received modified academic instruction in a structured, consistent, small group setting.

- **Structured Learning Labs (SLL)** – These are intensive educational programs for students with Autism Spectrum Disorders (ASD) and other developmental disorders that require highly structured and individualized intervention for the development of functional communication skills and socially appropriate behaviors.

  - **SLL Learning to Learn** – This program provides early intervention in a highly structured, predictable environment for early elementary students with disabilities that require a more restrictive setting to meet their specific communication, social, and behavioral needs.

  - **SLL Adapted Behavior** – This program provides highly structured and individualized interventions in Grades Kindergarten thru 8 for the development of socially appropriate behaviors and communication.

  - **SLL Social Communication Training** – This program serves students in Grades 1 thru 12 who are academically close to grade level and have been evaluated by a multidisciplinary team and found eligible as a student with a developmental disability such as autism spectrum disorder or other developmental disorders. Students are provided intensive instruction to increase communication as well as social and/or behavioral interaction while working to address social problematic behaviors interfering in the learning of the student or others.

- **Social Development (SD)** – This program is designed for students with an emotional or behavioral disorder who exhibit inappropriate or disruptive behaviors. It is designed to teach pro-social, behavioral, and academic skills the student has not mastered. *Edgenuity* provides credit recovery courses in Grades 6-12.

- **Positive Approach for Students Success (PASS)** – This program supports the District initiative to increase inclusion of students with disabilities in mainstream settings by providing educational

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services within general education settings for students who have difficulty managing their behaviors. Students are monitored throughout the school day and are taught social skills that replace inappropriate behaviors. PASS provides a process for managing the behavior of students identified as behaviorally at-risk or emotionally/behaviorally disturbed by providing explicit teaching of behavioral expectations in mainstream settings. Daily and weekly behavioral analysis is used to guide intervention.

- **18+ Programs**

  - **Helping Each Adult Reach Transition Services (HEARTS)** – This is a program for any adult student who has completed state credits and assessment but has not met graduation criteria for employment, employability skills, or agency connection. It uses a non-traditional service model where students receive transition services both on campus and in the community.

  - **Adult Community Education Services (ACES)** – In this program instruction is received off-campus in the community as directed by the student's adult schedule, postsecondary goals, sustainability, and transition-based IEP goals. ACES is an innovative delivery model that provides authentic postsecondary experiences for students in environments that are age-appropriate. Person-centered planning is used to develop individual schedules that are all unique. Creative strategies are used to support student needs such as using Uber to provide transportation for students who have none. This is a year-round program to mirror authentic, real-world work schedules. Students receive itinerant services for 14 months to launch them into a career.

- **Galveston-Brazoria Cooperative for the Deaf and Hard of Hearing (GBCDHH)** – This program is a shared services agreement among nine-member districts and CCISD is the fiscal agent. Services are provided for students who have an auditory impairment (AI) offered in three ways: Itinerant baby (0-3), Itinerant school-aged, and site classrooms.

- **Academic and Behavior Schools East (ABS)** – This program is operated by the Harris County Department of Education (HCDE) and provides services to 22 school districts who contract with HCDE to provide special education services to students aged 5 thru 22 with intellectual, developmental and behavioral disorders, autism spectrum disorder, and other significant health impairments. This is one of several out-of-district placements the District utilizes.

CCISD does not provide every specialized program on each campus but places programs in locations that can serve students from multiple schools. This is typical practice in school systems and an efficient approach to managing program resources. ARD committees make every effort to assign students in need of a particular specialized program to a class that is in or as close to their home/neighborhood school as possible. Table 4-6 summarizes the number of campuses, students, and teachers associated with each program.

Table 4-6. CCISD Total Students per Specialized Program, October, 2018

Program	Campuses	Students	Teachers	Student-Teacher Ratio
Preschool Program for Children with Disabilities (PPCD)	13	123	23	5.3
Student Support Lab: Learning to Learn (PPCD)	1	7	1	7.0
Alternative Academics (AA)	30	429	55	7.8
Student Learning Lab: Learning to Learn (SLL: LtoL)	2	31	5	6.2
Student Learning Lab: Adaptive Behavior (SLL: AB)	3	17	4	4.3
Student Learning Lab: Social Communication	3	23	3	7.7
Social Development (SD)	8	84	12	7.0
Positive Approach for Students Success (PASS)	11	119	11	10.8
Helping Each Adult Reach Transition Services (HEARTS)	5	45	5	9.0
Adult Community Education Services (ACES)	NA	14	1	14.0

Source: Clear Creek Special Services Department, Data Request 10.

Curriculum and Instruction

Most students with disabilities follow the general education curriculum aligned with the Texas Essential Knowledge and Skills (TEKS) or a modified version. Students in Alternative Academics and HEARTS classrooms use the *Unique Learning System* which is an online, interactive, and standards-based alternative curriculum specifically designed for students receiving special education services who access the curriculum through pre-requisite skills and who take an alternative State of Texas Assessments of Academic Readiness (STAAR) assessment, which is aligned with the TEKS.

Teachers of students in the Structured Learning Lab utilize the Verbal Behavior Milestones Assessment and Placement Program (VB-MAPP). The program identifies language and learning barriers, supplies a transition to less restrictive settings assessment, and includes 1,000 tasks with task analyses. Social Development and homebound teachers utilize online classes through *Edgenuity*. Vocational Adjustment Classes (VAC) recently began using the *NextUp* program, which utilizes technology and social media platforms to enhance instruction. An internally developed curriculum for SLL is soundly research-based. Competency-based assessments are given three times per year to measure student attainment of curriculum standards and benchmark assessments are utilized to measure academic growth.

The Department of Instruction has developed model lesson plans in all subjects and Instructional Specialists were included in the development of these plans. This type of collaboration only strengthens the curriculum and should be carried over into instructional coaching, as discussed in *Chapter 3 – Special Education Program Management*.

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Recommendation 16: Provide access to training to general educators in high-yield strategies for students with disabilities.

Along with district and special education professional development sessions that are offered throughout the year, all CCISD teachers have access to online courses in *Eduphoria* that are available anytime/anywhere. During 2017-18, more than 300 courses were available for teachers. According to Gibson's analysis, the range of teacher participation per course was between 0 to 179. Content both general education and special education topics. Additionally, Region 4 provides training sessions on a variety of special education topics. One hundred forty of these sessions were taken by CCISD staff. However, the information provided by the District did not identify if staff taking these courses were general or special educators.

All of the above professional learning opportunities are available for general education teachers to take on an optional basis, but the sessions are designed primarily for special educators and may not specifically address the needs of general education teachers. In inclusive settings, teachers need to recognize the full array of possibilities for accommodations to meet the unique needs of all students with disabilities which includes the following:

- *Presentation*: A change in the way information is presented. For example, letting a child with a learning disability in reading listen to audiobooks instead of reading printed text.

- *Response*: A change in the way a student completes assignments or tests. For example, providing a keyboard to a student who struggles with handwriting when writing an essay.

- *Setting*: A change in the environment where a child learns. For example, allowing a student with Attention-deficit/hyperactivity disorder to take a test in a separate room with fewer distractions.

- *Timing and scheduling:* A change to the time a child has for a task. For example, providing extra time on homework for a child who has slow processing speed.

As increasing numbers of students with disabilities are being included in general education classrooms, teachers in those classrooms need a broader scope of instructional and behavioral techniques to effectively assimilate these students with varied needs. They need strategies to teach students at their ability levels with expansive instructional techniques, using sound learning principles as well as different modalities to appeal to multiple intelligences, interests, and knowledge backgrounds.

Many general education teachers expressed in interviews and site visit conversations a need for additional professional learning regarding teaching students with disabilities. These teachers communicated that they did not feel adept at differentiating instruction for students with disabilities or in addressing inappropriate behaviors. Special education teachers are encouraged to deepen their learning about teaching and learning strategies for students with disabilities through multiple professional development opportunities that are not always available or scheduled for general education teachers. For example, professional development modules regarding instructional strategies for teaching students with disabilities are available for special education staff on *itslearning*; however, these modules are not

accessible to general educators. Access should be granted to all teachers to facilitate the use of high-yield strategies for teaching students with disabilities.

Recommendation 17: Ensure special education teachers have more opportunities to participate in professional learning communities and other professional development with content area teachers.

During interviews and campus visits, special education teachers shared that they do not have a deep understanding of content standards and expressed their desire to receive more training on TEKS. District special education administrators agreed that this was a need. As the District shifts to more inclusive placement of students with disabilities, special educators will need to know and understand the content standards more deeply in order to be able to design specialized instruction that is scaffolded upon these standards.

The District should ensure that campus administrators understand the need for special education teachers to know the content standards. A better understanding of the content standards has the potential to impact the performance gaps that exist between non-disabled students and students with disabilities. Campus administrators will need additional tools and expertise to develop master schedules that provide opportunities to special educators to collaborate and learn with content area teacher.

Recommendation 18: Accelerate the use of digital teaching and learning to differentiate instruction and personalize learning for students with disabilities.

Digital tools, even though provided on a 1:1 ratio in Grades 3 thru 12, are not being fully utilized to create personalized learning daily. During Gibson's 10 school visits, limited use of digital devices was observed both in general education classrooms where inclusion was occurring and in special education classrooms. Even at Weber Elementary, which is a blended learning pilot site, digital devices were not being utilized in most classrooms observed. It is important to note that the District recently added a learning technology position which should accelerate the adoption of digital teaching and learning practices.

CCISD should set expectations for use of digital devices and provide professional development to support the use of digital teaching and learning in order to differentiate and personalize learning for students with disabilities. The District's learning management system, *itslearning,* provides teachers with real-time student data that tracks progress, mastery of standards, time spent on activities, and graded assignment. All elementary schools have access to *Dreambox* and early reports are validating the efficacy of use and improved performance on STAAR.[26] Further analysis of *Dreambox* progress and competency-based assessment mastery is planned. Some schools have access to *Lexia* (digital content that differentiates literacy instruction). A validity report produced by *Lexia* indicated that 81 percent of the 712 CCISD Grade 3 through Grade 5 students who used *Lexia's Core5* and reached their end-of-year goal also achieved Meets or Masters Grade Level on STAAR. Usage reports are generated weekly and monthly for data conversations on campuses led by the principal and instructional leadership team. The analytics in the

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[26] Clear Creek ISD, Data Request #202, *TX Validity Report and Instructional Technology*.

digital content has been analyzed and should be used in the future to inform instructional planning as the District scales the use of blended learning on a larger scale.

As shown in *Chapter 3 – Special Education Program Management*, CCISD has a significant gap between the academic outcomes for general education students and those with disabilities. Accelerating learning with adaptive, intelligent digital content can narrow this gap and enable students who are behind, including those with disabilities, to progress more quickly. Teachers will need additional training on digital teaching and learning. The use of adaptive digital content will enable teachers to differentiate instruction to greater degrees because the analytics move the student through the instructional materials at an appropriate pace. *Dreambox* is at all elementary campuses and *Lexia* is at a handful of schools. Monitoring usage and results from these programs will be important to determine their effectiveness and to determine if scaling to additional schools is warranted.

Best practice supports the use of blended learning, which is "a fundamental redesign of instructional models with the goal of accelerating learning."[27] It is the strategic integration of in-person learning with technology to enable real-time data use, personalized instruction, and mastery-based progression. In addition, blended learning employs the use of small group instruction using data to inform groupings, further creating learning environments where differentiation of instruction can occur. The use of differentiated, adaptive, intelligent digital content in a blended environment can address a concern that was expressed by special education teachers during interviews that they find it difficult to find resources to utilize when students are several grade levels behind.

In collaboration with the Department of Instruction, special education staff should develop a protocol for learning walks that encompasses blended learning practices that are expected. Any digital content being considered for purchase should be reviewed by end-users and a process for determining expected academic outcomes for each digital program needs to be established in advance.

Recommendation 19: Set expectations for transition ARDs to ensure students with disabilities and their parents are not negatively impacted when the student changes campuses.

Transitions of students with disabilities in CCISD schools are not always well designed. When students transition from one school to the next, receiving schools are given notice that a transition ARD has been scheduled but, according to staff feedback, they often are not included in selecting the time and date of the ARD, which makes it difficult to ensure someone can attend. For this reason, the receiving school is sometimes unable to send a representative to the ARD or they send a representative but that person may not have a full understanding of the master schedule at the receiving school. This results in conflicts that must be corrected during the following school year whereby an additional ARD meeting is scheduled to modify the IEP after the school year begins.

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[27] Source: *Learning Accelerator*. *Learning Accelerator* is a nationally recognized organization focused on improving K-12 education through blended learning initiatives. https://learningaccelerator.org/

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The presence of the receiving school at a transition ARD, whenever possible, is critical to ensure the services discussed and ultimately determined for delivery at the new school are appropriate. Advance scheduling with both schools involved is a necessity. This is an opportunity to acclimate parents to the culture of the new school and to initiate a relationship between the parents and the new school staff. Misunderstandings can be avoided if parents have a clear understanding of changes to expect at the school next level. At the very least, input from the receiving school should be provided to guide the ARD team in writing an IEP that can be implemented appropriately at the receiving school without the need to assemble the ARD committee for an additional meeting the following year. For example, the receiving school team leader should be required to complete a digital form to the sending school that includes the master schedule and available classes for this purpose.

Staff time is valuable and should be scheduled carefully to protect instructional time. Although participating in a transition ARD, rewriting IEPs, and rescheduling require an allotment of time, students are better served when the time is invested in writing an IEP that meets their needs at the time the ARD is written but also provides a smooth start at a new school.

Student Discipline

Recommendation 20: Implement effective strategies to address the disproportionate number of special education students in discretionary placements.

Exclusionary disciplinary practices for students with disabilities are being over-utilized in CCISD. Table 4-7 provides the percentages of both general education students as well as students with disabilities who are placed in in-school suspension (ISS), out-of-school suspension (OSS), and disciplinary alternative education program (DAEP). The percentage of students with disabilities placed in all three discretionary placements exceeds the percentage of their non-disabled peers who are similarly placed.

Table 4-7. CCISD Percent of Students ISS, OSS, and DAEP Percentages by Student Group, 2017-18

Type of Suspension	General Education Students	SPED Students
In-School (ISS)	8.1	12.7
Out-of-School (OSS)	2.4	4.8
DAEP	1.1	2.0

Source: Performance-Based Monitoring Analysis System (PBMAS), 2017-18.

The percentage of students with disabilities in CCISD expelled or assigned to OSS for 10 or fewer days is greater than four of the seven benchmark districts; the percentage of students with disabilities in CCISD assigned to ISS for 10 or fewer days is greater than all but one benchmark district; and, the percentage assigned to ISS for more than 10 days is highest in CCISD.

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Table 4-8. Percentage In-School Suspension and Out-of-School Suspension or Expulsion, 2017-18

Type of Exclusion	OSS & Expulsion <=10 Days	OSS & Expulsion >10 Days	ISS <=10 Days	ISS >10 Days	Total Disciplinary Removals
Clear Creek	**4.8**	**-**	**13**	**1.4**	**55.8**
Katy	3.5	-	7.4	-	**22.6**
Conroe	4.3	-	11.3	0.5	**40.2**
Klein	10.3	0.8	15.3	0.9	**71.9**
Lewisville	2.9	-	5.9	-	**20.5**
Round Rock	5.1	-	8.5	0.5	**38.8**
Humble	5.8	-	11.1	1.2	**47.2**
Leander	1.5	-	9.4	1.2	**33.4**

Source: PBMAS, 2017-18.

CCISD had a disproportionality risk ratio of 2.6 in the area of ISS > 10 Days. This is the second year for this same designation. African American students with disabilities are 2.5 times more likely than other races to be placed in ISS for more than 10 days.[28]

Research clearly indicates that when education is disrupted by long absences (such as suspension or expulsion), the probability of a student dropping out of school increases dramatically; and, children with special needs that drop out are much more likely to never complete a diploma and remain unemployed and economically dependent. Attention to this type of data is critical because the removal of students with disabilities from school can be interpreted as a denial of services. Specific strategies the District can utilize to address the disproportionality of student discretionary placements include:

- Increase professional development opportunities for both special education and general education teachers and paraprofessionals that focus on behavior management. Ensure that all teachers receive training in order to employ multiple techniques to engage and motivate students who struggle to manage their own behaviors within general education settings. Currently, CCISD is developing training general education teachers on reintegration of students with behavioral issues.

- Ensure that student IEPs include behavioral goals and positive behavior interventions and supports when needed. When a Functional Behavior Assessment indicates the need for a BIP, the BIP needs to have measurable goals and objectives, be reviewed frequently, and modified as needed. Progress monitoring should be frequent and well documented.

- Ensure that both students and parents are familiar with the school's discipline code and understand the legal requirements in this particular area, and that both are involved in the development of the student's BIP. Positive interventions and/or Restorative Discipline on

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[28] Clear Creek ISD PBMAS report 2017-18.

campuses where it is practiced should be a precursor to any discretionary out-of-class placements, except in extreme cases.[29]

- Increase the use of digital tracking of student behaviors. Behavior tracking is being done at CCISD, for the most part, manually through the use of positive point sheets on which the frequency and duration of both negative and positive behaviors are recorded. Digital tracking is available but many staff reported that they needed additional training to feel comfortable using it. Appropriate training on using the digital tracking system needs to be provided to ensure student progress toward accomplishing behavior goals is easily accessible.

- Ensure teachers/paraprofessionals frequently collect and analyze data required by the BIP and modify as needed.

- Provide targeted instruction in appropriate social skills. Using preventive strategies will decrease the need for punitive responses to inappropriate behavior. Students may need training in conflict resolution, power struggles, bullying, self-regulation, or anger management.

Schools need to fully utilize the social skill curriculum for students provided by the District and teachers may need training to proactively address inappropriate behaviors through methods such as de-escalation and avoiding power struggles. Positive Behavior Intervention System (PBIS) is in the second year of implementation and has expanded from five schools in Year 1 to 15 schools in Year 2. Training for all staff is available through the Director of Parent Assistance on Behavior 101, 102, and 103. Most recently, the District added Conscious Discipline training which combines social-emotional learning, discipline, and classroom management for students in trauma.

Recommendation 21: Carefully monitor adherence to CCISD's policy and guidelines for using restraint to ensure compliance and target additional training to staff on high incident campuses.

Physical restraint refers to direct physical contact from an adult that prevents or significantly restricts a student's movement. CCISD's policy and guidelines on the use of restraints states: *It is the policy of CCISD to treat all students with dignity and respect, including students with disabilities who receive special education services. All behavior management and/or discipline management techniques are implemented in such a way as to protect the health and safety of the student and others. No discipline management practice may be calculated to inflict injury, cause harm, demean, or deprive the student of basic human necessities. Restraints are to be:*

- *Used only in an emergency involving imminent physical harm to student or others;*

- *Limited to the use of force as is necessary to address the emergency;*

- *Discontinued at the point at which the emergency no longer exists;*

- *Implemented in such ways as to protect the health and safety of the student and others;*

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[29] Restorative Discipline is a whole school relational approach to building school climate and addressing student behavior that fosters belonging over exclusion, social engagement over control, and meaningful accountability over punishment.

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- *Never used to deprive the student of basic human necessities;*

- *Requires documentation and notification; and,*

- *Reported in PEIMS.*

CCISD's guidelines align with the United States Department of Education's guidance on the use of restraints.[30]

In 2017-18, CCISD reported 367 incidents of restraint across 26 campuses, which is a significant decrease from the two prior years (633 in 2015-16).

Table 4-9. CCISD Number of Incidents of Restraint, 2014-15 to 2017-18

Restraints	2014-15	2015-16	2016-17	2017-18
26 Campuses	312	633	737	367

Source: CCISD Data Request 17.

Further analysis of district data shows that there is an overreliance on the use of restraints to manage inappropriate behaviors on some campuses. To illustrate this point, Table 4-10 shows the number of incidents of restraint at campuses with SD classrooms, as it is expected that schools with more SD classrooms may have more incidents that require student restraint. For example, the average restraints per year at Ferguson (135.4) and Parr (52.6) elementary schools far exceeds that at Gilmore (0.4) and Ward (0.0) elementary schools even though they all have the same number of SD classes. Similarly, the average number of restraints per year at Clear Creek High School (33.0) exceeds that of Clear Lake High School (19.0) by more than 56 percent, and Space Center Intermediate's average number of restraints per year (13.6) is more than twice the number at Victory Lakes Intermediate (6.0). It is possible that some of the restraint incidents identified in Table 4-10 represent the use of restraint multiple times for a single student.

Table 4-10. Number of Incidents of Restraint, 2013-14 to 2017-18

Schools	# of SD Classes	2013-14	2014-15	2015-16	2016-17	2017-18	Average Restraints/Year
Clear Creek HS	1	0	25	37	59	44	33.0
Clear Lake HS	1	24	23	48	0	0	19.0
Space Center Int.	1	8	8	8	26	18	13.6
Victory Lakes Int.	1	0	8	0	8	14	6.0
Ferguson ES	2	8	46	335	220	76	135.4
Gilmore ES	2	0	0	0	0	2	0.4
Parr ES	2	8	16	143	33	71	52.6
Ward ES	3	0	0	0	0	0	0.0

Source: CCISD Data Request 17.

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[30] U.S. Department of Education Restraint and Seclusion: Resource Document 13, May 2012 (https://www2.ed.gov/policy/seclusion/restraints-and-seclusion-resources.pdf).

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Procedures for close monitoring of the use of restraints need to be developed and followed. The use of restraint, particularly when there is repeated use for an individual child, multiple uses within the same classroom, or multiple uses by the same individual, should trigger a review and, if appropriate, revision of strategies currently in place to address dangerous behavior.

The use of restraints can be reduced by structuring the environment using a non-aversive effective behavioral system such as PBIS. Effective positive behavioral systems are comprehensive, in that they are comprised of a prevention-oriented framework or approach for assisting school personnel in adopting and organizing evidence-based behavioral interventions into an integrated continuum that enhances academic and social behavioral outcomes for all students. When integrated with effective academic instruction, such systems can help provide the supports children need to become actively engaged in their own learning and academic success. Schools successfully implementing comprehensive behavioral systems create school-wide environments that reinforce appropriate behaviors while reducing instances of dangerous behaviors that may lead to the need to use restraint or seclusion.

In schools implementing comprehensive behavioral systems, trained school staff use preventive assessments to identify where, under what conditions, with whom, and why specific inappropriate behavior may occur, as well as implement de-escalation techniques to defuse potentially violent dangerous behavior. Preventive assessments should include: (1) a review of existing records; (2) interviews with parents, family members, and students; and (3) examination of previous and existing behavioral intervention plans. Using these data from such assessments helps schools identify the conditions when inappropriate behavior is likely to occur and the factors that lead to the occurrence of these behaviors; and develop and implement preventive behavioral interventions that teach appropriate behavior and modify the environmental factors that escalate the inappropriate behavior.

The use of comprehensive behavioral systems significantly decreases the likelihood that restraint would be used, supports the attainment of more appropriate behavior, and, when implemented as described, can help to improve academic achievement and behavior. It would be prudent for CCISD to continue to refine then expand the use of PBIS beyond the 15 schools currently using this program. Staffing for any expansion will be critical for the success of any scaling efforts.

Recommendation 22: Develop a system for documenting and tracking the use of time-out, not only at the campus level but also at the district level.

The CCISD guidelines for use of time-out are as follows: *Time-out is used in conjunction with an array of positive behavior intervention strategies. Documentation or data collection procedures for the recurrent use of time-out must be addressed in the student's goals and objectives or the BIP. The ARD committee will consider this data to evaluate the effectiveness of this intervention and its continued use for the student in question.*

According to most definitions, time-out is the "removal of the opportunity to receive reinforcement." In practice, time-out techniques can fall along a continuum from 'planned ignoring' to removal from the room. Therefore, some of the techniques previously used in classrooms which have been referred to as

time-out, may not fit the legal definition of time-out in Texas and, therefore, may not be held to the legal requirements. Time-out is outlined as either Non-exclusionary, which is the least restrictive, or Exclusionary time-out which results from more serious behaviors. Exclusionary time-out should only be used when Non-exclusionary attempts are not successful.

CCISD's guidelines align with the United States Department of Education's guidance on the use of time-outs.[31]

During the on-site visit the review team heard various terms used to describe these areas such as "time-out room", "break room", "cooling-off area", and "break pads". A common language around time-out is important to establish clarity about what time-out is and how it is to be implemented. The use of time-out procedures is documented at the classroom level but there was no data to indicate that this documentation is analyzed and monitored on a regular basis at the district level.

A total of 10 schools visits were conducted during the review team's on-site engagement. Time out areas were observed at all 10 schools (see Figure 4-7). The areas included the following:

- An area of the classroom partitioned off by a rug or a bookshelf but not enclosed

- An extension of the classroom with either a curtain over the entrance or no barrier

  - Some were comfortably furnished with bean bags, foam blocks, rugs, lamps, etc.

  - Some were partially filled with stored items such as books, vacuum, filing cabinets, etc.

  - One had a concrete floor with no rug or foam blocks

The District recently took measures to remove doors on areas used for time-out purposes; however, in some instances, staff are using foam pads as a barrier of protection between them and the student when the student is aggressive while in the time-out area. In situations where a child becomes a danger to themselves or others, district staff should follow policy and practice regarding the use of restraint.

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[31] U.S. Department of Education Restraint and Seclusion: Resource Document 13, May 2012 (https://www2.ed.gov/policy/seclusion/restraints-and-seclusion-resources.pdf).

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Figure 4-7. Time-out Rooms on CCISD Campuses, 2018
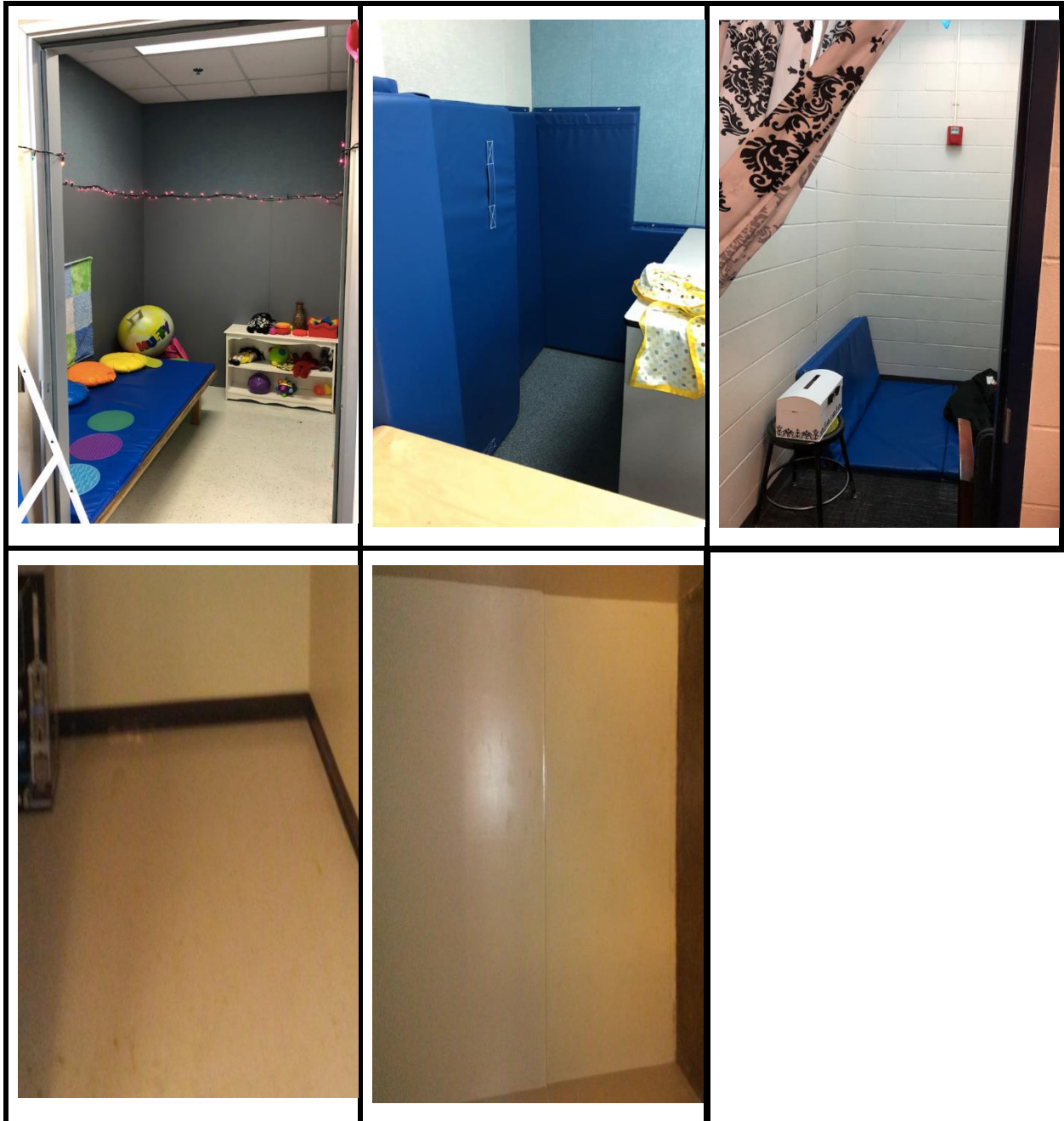
Source: Gibson Consulting Group, Inc.

Providing an area for students to voluntarily take a time-out aligns with best practice, therefore the establishment of time-out areas in self-contained classrooms is appropriate if used according to district policy. It is recommended, however, that District guidelines be revised to include a statement that proper documentation and tracking of the use of time-out is required to be reported at both the campus and district level.

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V. Parent Engagement and Support

The Individuals with Disabilities Education Act (IDEA) requires that parent input and desires must be considered when districts write Individualized Education Program (IEP) goals, related service needs, and placement decisions. In addition, schools are required to collaborate with parents and students with disabilities when designing and implementing special education services. And, research shows as parents become involved and empowered in the special education process, outcomes for students improve.[32] For these reasons, it is important to examine Clear Creek ISD's (CCISD) efforts to increase parent engagement and assess their overall satisfaction with special education program services.

Parent Feedback

During the course of this comprehensive review, great efforts were made to ensure that there were multiple opportunities for parent input. This included an on-line parent survey, two focus group sessions with parent representatives from the Special Education Parent Teacher Association (SEPTA) and the Parents for CCISD Special Education Reform group, and a Parent Input Session. This section provides a summary of the parent feedback received through these efforts.

Parent Survey

To assess whether parents are satisfied with the quality of the special education programs and services offered by CCISD, surveys were administered in November 2018 to parents of all students with disabilities who currently have an IEP. The review team utilized the Quality of Services Scale (QSS) created by the National Center for Special Education Accountability Monitoring (NCSEAM). Refer to *Appendix C – Parent Survey Results* for a more comprehensive description of the survey instrument, the sampling frame and the survey administration process, the response rate and respondent characteristics, analysis methods, and disaggregated survey results.

Of the 4,636 unique parent-student surveys sent, a total of 1,270 surveys were received, yielding a 27 percent response rate. With some minor differences, the students of parents who responded to the survey were representative of most students receiving special education services in the District with respect to their demographic, primary disability, and program membership characteristics.

Eighty-two percent of parents agreed, strongly agreed, or very strongly agreed with the following statement: *Overall, I am satisfied with my child's progress towards his/her IEP goals*, while 80.2 percent of parents agreed, strongly agreed or very strongly agreed with the following statement: *My child is receiving the special education services s/he needs*. While these results overall are positive, it is important

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[32] *The Influence of Parent's Involvement on Children with Special Needs' Motivation and Learning Achievement,* Siti Bariroh, March, 2018 (https://files.eric.ed.gov/fulltext/EJ1175306.pdf).

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to note that nearly 20 percent of parents disagreed, strongly disagreed or very strongly disagreed with these broad statements.

Overall, parents in CCISD are satisfied with the quality of special education services in the District: 90 percent of parents agreed, strongly agreed or very strongly agreed with the following statements:

- School is a friendly place (91.7 percent).

- Teachers are knowledgeable and professional (91.4 percent).

- Teachers expect my child to succeed (91.1 percent).

- My child's IEP tells how progress towards goals will be measured (91.0 percent).

- The principal sets a positive and welcoming tone in the school (90.6 percent).

Fewer than 80 percent of parents agreed, strongly agreed or very strongly agreed with the following statements:

- School offers students opportunities to learn about students with disabilities (69.5 percent).

- The school or district evaluates whether services are effective (78.7 percent).

Examining only the frequency of agreement to each individual item, however, may mask subtle differences in how parents feel about the quality of special education services overall or by student subgroup. To address this, the review team also used a combination of comparative descriptive statistics and multivariate techniques to describe parents' assessment of the quality of special education services delivered by CCISD. This model also allowed the review team to analyze whether the QSS scores between subgroups were statistically significant.

According to the questions used to measure parents' perceptions of the quality of special education services delivered by CCISD, most survey respondents agreed that staff were exhibiting the hallmarks of high-quality special education instruction and services. Importantly, the scale score was high for almost all student subgroups examined (indicating high satisfaction). There were no statistically significant differences by student gender, economic status, English language proficiency status, or by race when accounting for the influence of all variables simultaneously. Notably, parents of the three most common race subgroups (White, Hispanic and Black) had almost the same scale scores, as did parents of female and male students. Also, there was no statistically significant difference between parents who indicated that their child had received services in another school district from those whose children have not.

Two subgroups whose results were statistically significant include:

- Parents of elementary-aged students were more satisfied than parents of either middle or high school-aged students[33]; and,

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[33] Students' school level was based on students' grade level in the administrative records. The elementary school level included students include early elementary, pre-kindergarten, kindergarten, and in Grades 1 through 5.

- Parents of students with a primary disability of learning disability (LD) were more satisfied than parents of students with a primary disability of other health impairment (OHI).

The review team also examined survey results by school to determine if some schools have more or less satisfied parents than others. Arlyne and Alan Weber Elementary had the highest QSS score across all schools, which was more than 30 points higher than the next highest school, Stewart Elementary. Among secondary schools, Clear Creek Intermediate had the highest QSS score, which is notable since it was higher than many other elementary schools. Schools with the lowest QSS scores were Victory Lakes Intermediate, Space Center Intermediate, Seabrook Intermediate, and Clear Creek High School. Notably, while parents of elementary-aged children had the most positive perspectives on quality of services on average, John Ward Elementary had one of the lowest QSS scores in the District.

Schools with high QSS scores can serve as exemplars and the District may look to those schools for sharing out best or promising practices. In contrast, schools with lower QSS scores may benefit from further examination of statements their parents rated *they were less likely to agree with* to inform potential areas for improvement efforts.

Qualitative Feedback

Qualitative feedback was received during parent focus group sessions and on written responses to the following open-ended questions posed by the review team as part of the Parent Input Session (117 written/emailed responses) and on the Parent Survey (639 total responses):

- In what ways could the district improve its programs and services to students with special needs?

- In what ways could the district improve communication and/or outreach to parents/guardians of students with special needs?

- Are there any areas where you feel the district and/or your school is meeting or exceeding your expectations with respect to special education programs and services?

- Is there anything else you would like the review team to know?

Although a wide range of feedback was provided, only the consensus themes related to parent perceptions regarding program strengths and improvement opportunities/concerns (in no particular order) are summarized below:

- Many parents expressed appreciation and accolades for their child's teacher and stated that they feel that CCISD staff truly cares about their child.

- Poor communication between parents and district leadership has led to feelings of mistrust and adversity.

- There is a lack of transparency from district leadership, and some parents expressed a concern about their lack of knowledge of what district resources are available for them.

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- Communications between school and home are insufficient. Because many students have difficulty with communication, parents lack consistent knowledge about their child's daily activities.

- Principals, teachers, paraprofessionals, and other staff lack on-going professional development related to their child's specific disability.

- General education teachers lack appropriate training to ensure that the accommodations specified in their child's IEP are implemented.

- Some parents reported delays in their child's initial evaluation.

- Admission, Review, and Dismissal (ARD) meetings often feel unbalanced due to the large numbers of CCISD staff that attend and [some] parent's lack of sufficient information around basic special education terminology, processes, and legal rights.

- Some parents reported that they did not receive copies of their child's draft IEP prior to the ARD meeting and therefore felt unprepared to make important decisions in these meetings.

- Several parents want more information regarding the progress of their child on academic goals and access to instructional resources so that they may reinforce learning at home.

- Parents feel that there are not enough paraprofessionals and Board Certified Behavior Analysts (BCBAs) to effectively support teachers and students.

- Some students are inappropriately placed in "time out rooms" or "break rooms".

- Parents want the District to establish a parent advisory board so they can have a voice in the development of special education programs and services.

The quantitative and qualitative feedback was used to inform many of the improvement opportunities presented in this and other chapters of the report.

Parent Engagement

Special Education Parent Teacher Association

The CCISD's Special Education Parent Teacher Association was established in November 2015 and, according to district officials, was the first SEPTA to be established in the state of Texas. Its mission is to promote the collaboration and engagement of families and educators in the education of children and youth; engage the public in united efforts to secure the physical, mental, emotional, and social well-being of all children and youth; and, advocate for laws that further the education, physical and mental health, welfare, and safety of children and youth. SEPTA provides families with children who have special needs the opportunity to meet other parents in similar circumstances. It also provides families with an organizational structure, resources, and the opportunity to be a collective voice and advocate for all

students with disabilities. SEPTA is a membership organization and is open to families, faculty, students and community members.[34] Currently, there are 150 members.

Special Education Parent Advisory Committee

In fall 2018, CCISD began the process of establishing a Special Education Parent Advisory Committee (SEPAC). The goal of SEPAC is to provide two-way communication and collaboration between parents and district leadership to improve the programs and services for students with disabilities. SEPAC will be comprised of one parent of a special needs student from each of the district's 44 schools. SEPAC will serve in an advisory capacity to the Superintendent and the District's special education leadership team and will meet quarterly with district leadership to discuss topics and services related to special education. Regular meetings with parents in an advisory capacity strengthens the connection and partnership between school and home that is critical to establishing trust and to improving outcomes for students.

Recommendation 23: Follow best practice standards when starting and structuring SEPAC.

CCISD should be commended for starting a SEPAC. Ensuring that it is well-structured can leverage the positive influence of parental input and be a vehicle for effective communication, building trust, and system change. Below are some suggested best practices for the District to consider as it continues the formation of this committee:[35]

- Seek representation from parents within the District who have children with different levels of need, of different ages, in different schools, and in different types of programs, including out-of-district placements. Although the District has opted to randomly select parent volunteers from each school, CCISD should evaluate the membership roster in future years to ensure representation across these variables. It should also ensure that SEPAC reflects linguistic, religious, racial, cultural, and economic diversity.

- Develop a mission statement and set annual goals and objectives to guide SEPAC's work.

- Establish basic ground rules, committee bylaws, a procedures manual, and other operating guidelines. Be sure established protocols include membership terms, a meeting calendar, and other pertinent information.

- Define roles and responsibilities for SEPAC members and district staff. Be sure to determine who sets the meeting agendas, chairs the committee, and is responsible for meeting minutes, among other things. CCISD may want to consider developing job descriptions for key positions.

- Consider outreach and communication strategies SEPAC will use to engage parents from other groups such as SEPTA, Parents for CCISD Special Education Reform, and the Parent Teacher Association. Include information about SEPAC on the District's website and in digital

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[34] http://septaccisd.org/

[35] Center for Parent Information Resources (https://sepacguide.org/starting-and-structuring-a-local-sepac-part-i-chapter-3).

communications to *all* families. Promoting SEPAC will help to build awareness and establish the organization's legitimacy.

Parent Communications and Supports

It can be an overwhelming task for many parents to navigate the complex and challenging road to special education. Strong and positive partnerships between parents of students with disabilities and their child's teachers, school administrators and district leaders are vitally important. Essential elements to building and maintaining these partnerships is good communication, parental supports, and a strong sense of mutual respect and value.

Recommendation 24: Create a special education parent resource center.

CCISD does not currently have a parent resource center (PRC). Establishing a PRC would assist parents in becoming partners in their child's education because it would provide a place where CCISD's families who have children with disabilities can visit to learn more about the special education process, how to work collaboratively with the school system, access materials from a lending library, receive training and attend workshops, and meet other parents of children with disabilities. The Special Services Department should collaborate with SEPTA, SEPAC, and the other district leaders to coordinate efforts and to ensure that the newly-established PRC meets their needs.

The PRC would need a dedicated space, resources such as computers and lending library materials, and staff, all of which will require an additional investment by the District.

Recommendation 25: Improve district-level communications and provide more relevant information to parents through enhancements to the District's website, the special education newsletter, and social media.

Though not all of the parent concerns were directed at the District's website, much of the static information parents routinely look for should be provided on the Special Services Department webpage on the District's website. Some specific improvement opportunities include:

- Create a link to SEPAC. The news of the SEPAC formation and application to join were embedded in the "District Committees" portion of the website, and currently not connected in any way to the Special Services Department webpage; information regarding SEPTA is buried deep within. Activity calendars for each organization should also be included under the respective page links. Calendars should include dates for meetings for each group for the entire school year. If registration for a parent event is required, embed a link in the event date on the calendar to direct parents to the appropriate piece of information. Include topics to be addressed in each meeting and the names of guest speakers attending events.

- Include a link to the special education parent resource center (if established) to aid in streamlining resolution to any parent questions or concerns and to link them to resources.

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- Include information about the role of the Parent Assistance Center, the PRC, and social workers and explain how they can help parents connect with the District.

- Update the "Programs and Services" page to include more than just brief program descriptions. For example, under the preschool services link include information such as transitioning into kindergarten, what parents should expect at each stage of development, as well as a summary of the types of services available for preschool-aged children.

- Include a section explaining Extended School Year (ESY) services and the criteria for qualification.

- Post common special education forms and documents (e.g., notice of procedural safeguards, blank IEP document, etc.) so that parents can have commonly referenced/used documents easily accessible. This information should also be included in the Special Education Parent Handbook.

- Include more specific information about Child Find on the District's website. Although the Special Services Department currently has some information under the "How to Refer for Services" section of the website, it does not specifically reference Child Find and the District's related responsibilities. These responsibilities include identifying, locating and evaluating any child ages birth to 21 with known or suspected disabilities who reside within the school district's boundaries to determine whether a need for special education and related services exist. Include a description of the Child Find program and information on how the program works, what staff members do to seek out children needing special education services, and other pertinent information. This will be especially useful for parents who have been visited by the Child Find team to help answer any questions that may arise after the visit.

The Special Services Department should be commended for producing an electronic newsletter, in collaboration with SEPTA, that highlights particular programs, features photos and recaps of student events, announces upcoming parent events, and provides links to selected parent resources and department contacts. The newsletter is developed using *AnyFlip*, a flip book maker viewable on any device, and is well organized. While most parents reported that they appreciate the newsletter as a vehicle for sharing some important information and celebrating things that are going well with parents and in the community, many expressed their desire to have more frequent and relevant information from the District.

Addressing this issue is two-fold. First, the Special Services Department should be sure to publish the newsletter on a consistent schedule (e.g., the first of every month). At present, publication of the newsletter appears to be somewhat random with long periods of time between each publication. The department should continue to seek input from SEPTA, and also from SEPAC and Parents for CCISD Special Education Reform, regarding the content. Second, and more impactful, the department should harness the power of the internet to improve communications to parents through on-line discussion boards and social media. Specifically:

- *Create and moderate discussion boards.* Enabling families of special education students to participate in discussion boards housed on the district website would give parents a central location to share experiences, post questions, share resources, and demonstrate to parents the

District's willingness to facilitate parent communication and collaboration. PRC staff, if established, should be responsible for checking the discussion board at least twice weekly, facilitating conversation, responding to questions that are posed that require answers from district personnel, ensuring that responses do not misrepresent district policies or procedures, and monitoring for inappropriate content.

- *Utilize social media.* In addition to discussion boards, the department should also utilize social media, such as Twitter, to "push" communications and relevant information more frequently to parents and other followers.

Recommendation 26: Improve communications to parents regarding their child's academic and behavioral performance.

The goal of any special education program should be to help students reach his or her potential and the parent-teacher connection is key to ensuring students meet the goals outlined in their IEPs. Parents and teachers are uniquely positioned to work as a team to ensure this occurs. Communicating effectively with parents also ensures that teachers are not solely responsible for a child's learning and encourages parents to continue lessons at home.

During the course of this review, parents consistently expressed a desire for more continuity between learning at school and learning at home. This includes more and better communications about their child's daily activities and academic and behavioral progress, as well as access to instructional resources so they can reinforce learning or behavioral strategies at home. For many students in specialized programs, daily communication logs are sent home each day, but they do not include specific information on how the student performed academically and behaviorally and generally do not meet parent's informational needs. In fact, parents of non-verbal children in particular said that they do not find a "smiley face" or general statements or such as "great day" very helpful. Figure 5-1 shows two different examples of communication logs collected by the review team during school visits, illustrating that there does not appear to be a standard format endorsed by the department.

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Figure 5-1. Sample Clear Creek ISD Daily Communication/Progress Documents
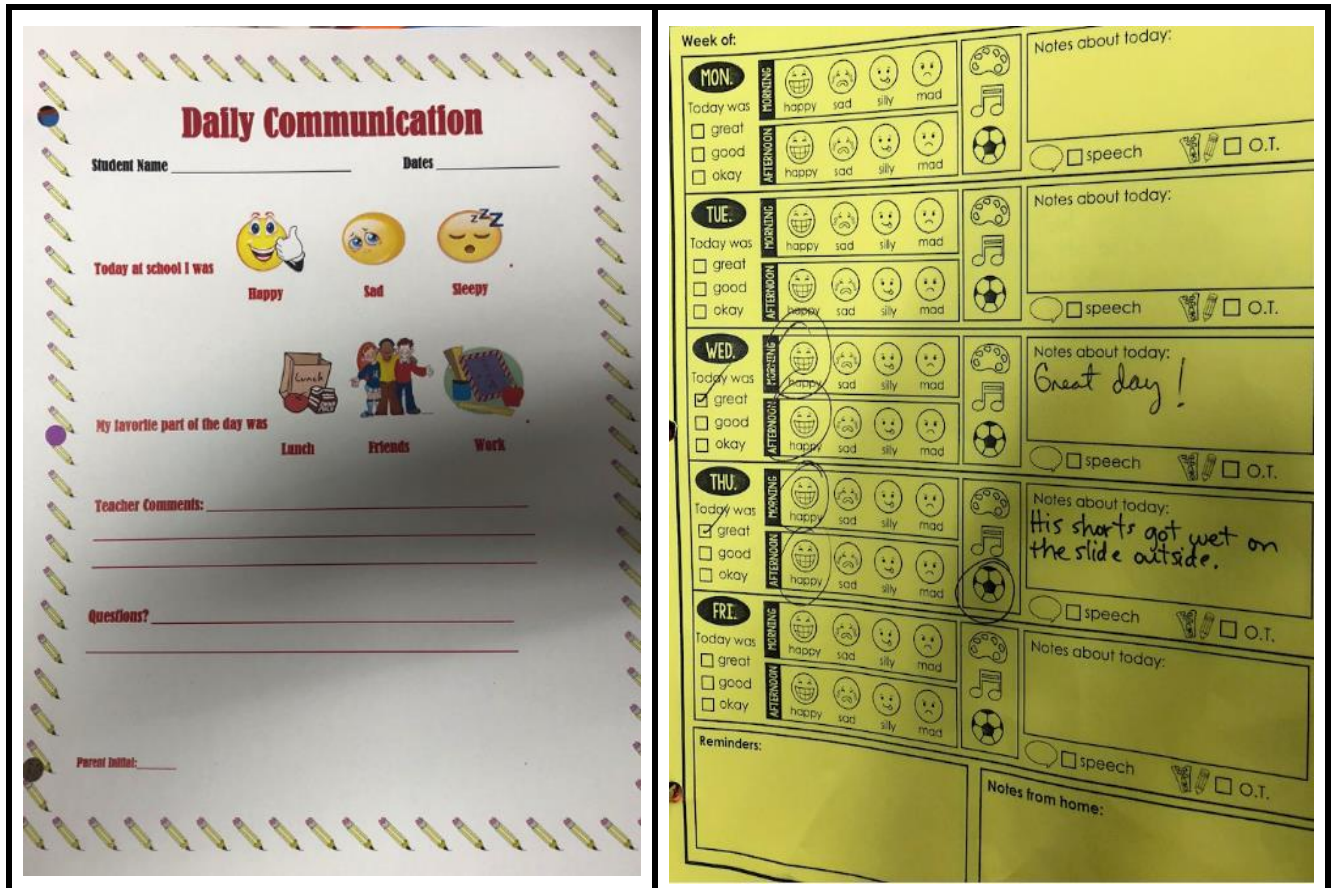
Source: Clear Creek ISD school visits (conducted week of October 02, 2018).

CCISD should develop a standard form for use at all campuses, differentiated by school/grade level and program. A standardized form would help to ensure that all teachers are communicating the same types of information about students to parents and that expectations around progress reporting are consistent across campuses, grade levels, and programs. Understanding that teachers have many students, and often twice as many parents with whom they need to communicate, daily progress updates should be direct, yet simple. For example, *"[Student Name] finished all of his math problems but still needs to finish his writing assignment"* would be an effective progress update. Figure 5-2 provides two examples of daily communication logs utilized in other districts.

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Figure 5-2. Example Daily Communication Logs

Source: Gibson Consulting Group, Inc.

CCISD currently utilizes *itslearning*, a cloud-based learning management system. The parent portal within this platform gives parents access to secure information about their child including courses and assignments, access to curricular resources, student progress and grades, teacher feedback on student assignments, and teachers notes.

In order to strengthen the home to school connection in CCISD, communication must be open, accessible, and clear. Teachers should communicate student progress, utilizing the teacher notes functionality in *itslearning*. Notes should be specific including what the student did well, areas that s/he is struggling, how at home practice can help solidify a concept, among others.

Recommendation 27: Ensure draft IEPs and other relevant materials are provided to parents within the required timeline prior to scheduled ARD meetings.

Parent participation in the special education decision-making process for their child is vitally important and, by law, they are equal partners on their child's IEP team. Although there is no legal requirement to do so, the Special Services Department has an established practice of providing parents with a draft IEP

at least five days prior to the scheduled ARD meeting in order to help parents feel prepared and better able to engage in a full discussion about the proposals of the IEP team. Parent feedback, however, suggests that this practice is not always followed. Special education team leaders should ensure that this practice is consistently followed and principals and department leadership should more closely monitor this process as part of the random IEP file review process.

IEP Due Process

IEP due process is protected under IDEA and provides parents with the legal right to resolve disputes with their school district when there is a conflict related to the identification, evaluation, or educational placement of their child, or the provision of a free appropriate public education. There are two ways to resolve disputes: mediation and a due process hearing. IEP mediation is the first step in due process, and is designed to assist both parents and the school district in reaching a compromise when a conflict arises. Mediations are voluntary and must be made available at no cost to the parents. If an agreement cannot be reached via mediation, then parents can request a due process hearing. Due process hearing is a more formal vehicle for resolving disputes. The process begins with a written complaint and ends with a decision made by an impartial hearing officer. Parents can appeal the decision all the way to state or federal court if they do not agree with the outcome.[36]

Table 5-1 shows the number of CCISD's due process hearings, settlements, and cases withdrawn from 2013-14 to 2017-18. The figures in the table below represent the year that the case was opened, which may be different than the year that the case was closed. At the time data were collected for this review, there were not any cases still pending. More than half of all cases in the past five years have been resolved via settlement.

Table 5-1. Clear Creek ISD Mediations and Due Process Hearings (DPH), 2013-14 to 2017-18

Outcome	2013-14	2014-15	2015-16	2016-17	2017-18	5-year Total
DPH: District Win		3				3
DPH: Split Decision				1		1
DPH: District Loss				1		1
Settlement	4	1	4	2		11
Withdrawn		2	2			4
Total	**4**	**6**	**6**	**4**	**0**	**20**

Source: Clear Creek Special Services Department: "#18 Mediations and Due Process Hearings."

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[36] wrightslaw.com

Appendix A – Site Visit Roster

Interviews

The review team conducted interviews with the following Clear Creek ISD staff:

- Dr. Greg Smith, Superintendent of Schools

- Dr. Steven Ebell, Deputy Superintendent for Curriculum and Instruction

- Holly Hughes, Assistant Superintendent of Elementary Curriculum and Instruction

- Dr. Karen Engle, Assistant Superintendent of Secondary Curriculum and Instruction

- Dr. Casey O'Pry, Assistant Superintendent of Human Resources

- Dr. Robert Bayard, Chief Technology Officer

- Dr. Megan Evans, Executive Director of Assessment and Evaluation

- Dr. Susan Silva, Executive Director for Curriculum and Instruction

- Dr. Cynthia Short, Executive Director of Special Services

- Cynthia Peltier, Director of Special Education Program Services

- Dr. Pam Moore-Ellis, Director of Special Education Support Services

- Megan Dickey, Director of Galveston Brazoria Cooperative for the Deaf and Hard of Hearing

- Jeff Kohlenberg, Director of Financial Services

- Tony Davila, Director of Parent Assistance

- Tacy King, Director of Instructional Services for ELLs

- Kevin Livingston, Coordinator for Elementary Special Services

- Rachel Kent, Coordinator for Intermediate Special Services

- Billye Trader, Coordinator for High School Special Services

- Brandi Breaux, Coordinator for Speech and Related Services

- Christy Lawrence, Coordinator for Early Childhood

- Lisa Hardcastle, Coordinator for 504 and Dyslexia Services

- Sophie Smith, Lead Team Leader

- Michelle Conner, Lead Homebound

- Kim Rogers, Transition Instructional Specialist

Focus Groups

The review team conducted the following group interviews. Each focus group included 8 to 10 participants randomly selected by the Gibson review team.

- Instructional Specialists

- Diagnosticians, Licensed Specialists in School Psychology (LSSPs), and Board Certified Behavior Analyst (BCBAs)

- Occupational Therapists (OT), Physical Therapists (PT), Music Therapists (MT), and Speech Language Pathologists (SLP)

- Homebound, Adapted Physical Education (APE), and Adult Community Education Services (ACES) teachers

- Special Education Team Leaders

- Specialized Program Special Education Teachers

- Inclusion or Resource Room Special Education Teachers

- General Education Teachers with inclusion classrooms and/or co-teach models

- Alternative Academic Program Aides

- Special Education Aides

- Elementary Principals

- Secondary Principals

- Parents for Special Education Reform in Clear Creek ISD

- Special Education PTA Parents

Parent Input Session

On October 02, 2018 between 5:30 PM and 8:00 PM, the review team allowed parents of Clear Creek ISD special education students to provide written responses to four questions provided by the review team. In total, Gibson received 117 written responses.

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School Visits

The review team visited ten schools and observed three to five classrooms at each campus. Schools visited were selected based on school level, special education programs, student demographics, and geographic location.

- Bay Elementary School
- Falcon Pass Elementary School
- Parr Elementary School
- Ross Elementary School
- Weber Elementary School
- Brookside Intermediate School
- Clear Creek Intermediate School
- Space Center Intermediate School
- Clear Creek High School
- Clear Springs High School

Appendix B – Individualized Education Program File Review

Background

All children with disabilities, regardless of the type or severity of disability, have a right to a free and appropriate public education (FAPE), and must be provided at public expense. An important part of the FAPE requirement is an Individualized Education Program (IEP) for each student. The IEP must articulate the student's unique needs, present levels of performance, measurable goals and objectives, and a description of the special education and related services that will be provided so that the child can meet his or her goals and learning objectives. As described in Public Law 108-446[37], the legally required components of the IEP include:

- A statement of the child's present levels of academic achievement and functional performance;

- A statement of measurable annual goals and how progress toward meeting the annual goals will be measured;

- Benchmarks or short-term objectives for students with disabilities who take alternate assessments aligned to alternate achievement standards;

- A statement of the special education and related services and supplementary aids and services, based on peer-reviewed research to the extent practicable, to be provided to the child, or on behalf of the child;

- Frequency for reporting the student's progress to parents;

- A statement of any individual appropriate accommodations that are necessary to measure the academic achievement and functional performance of the child on State and districtwide assessments;

- Opportunities to participate in extracurricular and nonacademic activities;

- Instructional setting and length of student's school day including the extent to which the child will not participate with nondisabled children in the regular classroom;

- Beginning not later than the first IEP to be in effect when the student turns 16, or younger if determined appropriate by the Admission, Review, and Dismissal (ARD) committee, the IEP must include a statement of transition services needs and must include appropriate measurable postsecondary goals based upon age appropriate transition assessments related to training, education, employment, and, where appropriate, independent living skills and the transition services needed to assist the child in reaching these goals;

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[37] https://www.copyright.gov/legislation/pl108-446.pdf

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- Beginning not later than one year before the child reaches age 18, a statement that the child has been informed of his/her rights and that those rights will transfer to the child on reaching the age of majority;

- Transportation needed to access services; and,

- A determination about the need for extended school services needed for the child to make progress in the general education curriculum.

The IEP must be reviewed at least once a year by the ARD team to determine if the child is achieving the annual goals. The ARD team must revise the IEP to address:

- Any lack of expected progress;

- Results of any reevaluation;

- Information provided by the parents; and,

- Anticipated needs.

Review Methodology

The primary objective of the IEP file review was to assess whether or not IEPs are compliant, of high quality, and follow best practice standards. In general, a quality IEP is in compliance with all requirements of state and federal laws and regulations and provides a clear statement of expected outcomes and the special education services and supports to be provided to the student.

The review team conducted a detailed review of 35 student IEPs, which represents approximately 0.1 percent of special education students.[38] Selection of individual students was random, but specific criteria were used in order to ensure that the sample size was somewhat representative of school level and primary disability types. Information contained within the IEPs was accessed utilizing *eSPED*, a browser-based data management software that tracks services for students with disabilities along with compliance. Table B-1 provides a summary of the IEPs reviewed.

Table B-1. Student IEP Review Sample

No.	Campus	Primary Disability	Instructional Setting
1	Arlyne & Alan Weber El	NCEC	45-fulltime EC PPCD
2	Armand Bayou El	Autism	45-fulltime EC PPCD
3	Art & Pat Goforth El	Auditory Impairment	41-recource room < 21%
4	Bay El	NCEC	40-mainstream
5	Brookside Int	Autism	44-SC SLL-AB Regular campus > 60%
6	Clear Brook HS	SLD	40-mainstream
7	Clear Brook HS	SLD	40-mainstream

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[38] Students receiving speech-only services were specifically excluded from the IEP review.

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No.	Campus	Primary Disability	Instructional Setting
8	Clear Brook HS	ID	42-resource room at least 21%/ less than 50%
9	Clear Creek HS	ED	41-resource room < 21%
10	Clear Creek HS	OHI	43-SC M/M Regular campus at least 50% but no more than 60%
11	Clear Creek HS	Autism	44-SC M/M Regular campus > 60%
12	Clear Falls HS	OHI	42- resource room at least 21% and less than 50%
13	Clear Falls HS	ID	08-vocational adjustment class
14	Clear Lake HS	OHI	40-mainstream
15	Clear Lake Int	SLD	40-mainstream
16	Clear Lake Int	SLD	40-mainstream
17	Clear Springs HS	SLD	40-mainstream
18	Clear Springs HS	OHI	08-vocational adjustment class
19	Clear View HS	Autism	40-mainstream
20	Creekside Int	SLD	40-mainstream
21	Darwin L Gilmore El	OHI	44-SC > 60%
22	Ed H White El	SLD	40-mainstream
23	Falcon Pass El	Autism	44-SC M/Mregular campus > 60%
24	G W Robinson	ID	44-SC M/Mregular campus >60%
25	I W & Eleanor Hyde El	Autism	44-SC M/Mregular campus >60%
26	James H Ross El	SLD	41-resource room < 21%
27	Lavace Stewart El	ED	41-resource room <21%
28	League City Int	OHI	40-mainstream
29	Margaret S McWhirter El	ID	41-resource room <21%
30	P H Greene El	NCEC	44-SC M/M regular campus >60%
31	Ralph Parr El	ED	44-SC M/M regular campus >60%
32	Space Center Int	ED	41-resource room <21%
33	Victory Lakes Int	OHI	42-resource room at least 21% and less than 50%
34	Walter Hall El	SLD	40-mainstream
35	Westbrook Int	SLD	40-mainstream

Source: Clear Creek ISD, eSPED.

The grades represented in the IEP file review are shown in Table B-2.

Table B-2. IEP File Review Grade Distribution

EE	K	1st	2nd	3rd	4th	5th	6th	7th	8th	9th	10th	11th	12th
2	3	0	1	2	6	1	2	5	1	2	1	4	*5

*2 students were beyond Grade 12 but were not coded as such.

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In addition to the federal requirements outlined previously, the following rubric was used to further evaluate the *quality* of each IEP:

1. *Annual revision timelines met*

   IEPs are reviewed at least annually.

2. *The Present Levels of Academic Achievement and Functional Performance*

   Present Levels of Academic Achievement and Functional Performance (PLAAFP) include the impact of the disability and statements of academic strengths, needs/weaknesses, and functional abilities and needs. Information for the PLAAFP was gathered from the evaluation, classroom assessments, and formal standards-based testing along with the comments and observations of teachers, parents and other knowledgeable individuals.

3. *Justification for Least Restrictive Environment (LRE)*

   The IEP should clearly state why the decision for placement was made, what placement options were considered, why a student is placed in a school he or she would not normally attend, if applicable, and that consideration was given to providing supplementary aids and services to support the student in general education to the maximum extent possible.

4. *Quantifiable and measurable academic and functional goals aligned with grade level standards*

   - Goals are specific, measurable, achievable, relevant, and time-limited.

   - For students who will take an alternate assessment, the goals are aligned to alternate achievement standards and should contain benchmarks or short-term objectives.

   - The frequency and method of reporting progress toward meeting the goals are provided.

5. *Appropriate levels of support and accommodations*

   A statement of the special education and related services and supplementary aids and services to be provided is given as well as a statement of the program modifications or supports for school personnel that will be provided, if appropriate, to enable the student to advance appropriately toward attaining the annual goals and to be involved in and make progress in the general education curriculum.

6. *Inclusion of a Behavior Intervention Plan, if appropriate*

   The plan is based on the results of a functional behavioral assessment (FBA) and, at a minimum, includes a description of the problem behavior, global and specific hypotheses as to why the problem behavior occurs and intervention strategies that include positive behavioral supports and services to address the behavior. Students with significant documented behavioral problems have a Behavior Intervention Plan (BIP).

7. *Consideration of need for assistive technology*

   A statement that the ARD team considered the need for assistive technology (AT). Any functional capabilities noted in the IEP should be considered for AT enhancement.

8. *Consideration of need for extended school year services*

A statement that the ARD team considered extended school year services (ESYS) and that the decision regarding services was based upon regression of critical skills.

9. *Provision of related services, if appropriate*

Related services should include any supportive service that is required to assist a student with disabilities to benefit from special education.

10. *Determination for participation in state and district assessments*

State and district assessments appropriate for the student's grade level are listed along with a justification if the ARD team determines that the student will take an alternate assessment. Assessment accommodations are aligned with accommodations provided for the student for instructional purposes.

11. *Measurable postsecondary goals based upon age-appropriate transition assessments related to training, education, employment, and, where appropriate, independent living.*

- Transition planning is provided no later than the first IEP to be in effect when the student turns 14. The plan includes a functional vocational evaluation, employment goals and objectives, independent living goals and objectives, and governmental agencies available to the student.

- Transition services are provided no later than the first IEP to be in effect when the student turns 16. Transition goals address training, education, employment, independent living skills, where appropriate, and the courses of study needed to assist the student in reaching their postsecondary goals.

- No later than one year before the student reaches the age of 18, a statement that the student has been informed of their rights that will transfer to them once they reach the age of majority is included.

Review Results

In large part, all of the IEPs address the federal requirements; however, there were some observations made related to the overall quality of the IEPs. The observations from the IEP review are used to support more specific findings and recommendations discussed in other chapters of this report. The results of the IEP file review are outlined below.

Annual Revision Timeline

All of the files reviewed appeared to have met the annual revision timeline requirement of one year. Additionally, all of the files reviewed indicated that reevaluations of previously identified students with disabilities had been met with two exceptions. One file had FIE dates of 09/29/09 and 10/28/13 which exceeds the three-year requirement for reevaluation. Another file had no evaluation data entered in the system.

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Present Levels of Academic Achievement and Functional Performance

Among other criteria, a well-written PLAAFP statement will describe and/or include: student strengths and weaknesses; learning preferences; limitations or impediments to learning; objective data from current evaluations and/or progress monitoring; information on how the disability impacts involvement and progress in the general education curriculum; and, a description of benchmarks or short-term objectives if an alternate assessment is taken.

A PLAAFP should be written so that a stranger could read it and have a general understanding of who the student is and what their capabilities and needs are. In three of the files reviewed, there was strong anecdotal information about the student, giving a clear image of who they are. This is particularly important when students are transitioning from one teacher to another at the change of a semester or school year, but especially when the student is transitioning to a new school. The PLAAFP in seven of the files reviewed had only performance data, obscuring a clear picture of the student as a whole.

The inclusion of objective data from current evaluations and/or progress monitoring in the PLAAFP is important because goals and objectives should be developed based on this quantifiable data. Of the 35 files reviewed, only 13 provided measurable scores to describe academic/behavioral performance. Although the remainder of the files contained some information about academic/behavioral performance, most of the information was not measurable which precludes the ability of the ARD committee to determine growth. Table B-3 illustrates the types of information found in the files reviewed.

Table B-3. IEP File Review, PLAAFP Contents

PLAAFP Measurable Contents	Number of Files
Measurable academic/behavior performance data	13
Course grades only	7
Assessment citations but no scores	4
FIE scores only	1
Non-measurable academic/behavior performance descriptions	2
No academic measures included	8

Least Restrictive Environment Justification

To receive Part B funds under the Individuals with Disabilities Education Act (IDEA) states must have in place procedures assuring that, "*to the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities, are educated with children who are not disabled, and that special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occurs only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.*"[39] The intent of the law clearly is a strong preference for educating students with disabilities

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[39] Source: IDEA 20 USC 1412(5)(B), Department regulations 34 CFR 300.550-300.556

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in regular classes with appropriate aids and supports. The review of the student files revealed the LRE designations included in Table B-4.

Table B-4. IEP File Review, LRE Designations

Least Restrictive Environment	Number of Students
Vocational adjustment class (ACES)	2
Mainstream	13
Resource < 21%	6
Resource 21-50%	3
Self-contained at least 50% but no more than 60% (HEARTS)	1
Self-contained >60%	8
Full-time EC (PPCD)	2

The process of selecting individual students whose files would be reviewed was semi-random to ensure that the sample size was representative of school level and primary disability types. Based upon the premise that the IEPs reviewed can be considered representative of all IEPs in the District, Clear Creek ISD's commitment to placing students in the least restrictive environment is clearly evident. Every IEP file reviewed included a form listing all LRE options that were considered and a justification for why the one recommended was selected. In addition, 33 of the 35 students attend classes on their home campus.

Quantifiable and Measurable Goals Aligned with Grade Level Standards

IEP goals should be based on measures found in the PLAAFP and should map a plan for students to progress in academic, motor, social, and behavioral areas. Goals should be:

- **Specific:** Name the skill or subject area and the targeted goal.

- **Measurable:** The goal should be stated in a way that progress can be measured by standardized tests, curriculum-based measurements or screening.

- **Attainable:** The goal should represent progress that is realistic.

- **Results-oriented:** The goal should clearly lay out what students need to do to accomplish the goal.

- **Time-bound:** The goal should include a time frame for achievement with the right supports and services. It should also state when and how often progress will be measured.

Training for teachers should promote these features to ensure goals and objectives are appropriately written.

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The goals in the files reviewed met most of the components necessary; however, there were some inconsistencies noted:

- 10 student files had no time frame for measuring progress.

- One student identified as emotional disturbance had no behavioral goals and no BIP.

- One student with behavioral goals in 2016-17 with no progress made had no behavioral goals in 2017-18.

- One student file had a social skill goal to turn in assignments with no strategies or objectives to accomplish the goal.

- One student's PLAAFP stated that they had 48 full day absences and 16 partial day absences that were adversely affecting their grades. The student's areas for growth included "*coming to school on a regular basis, completing and turning in assignments, as well as making-up missed assignments. [Student Name] would benefit from positive behavior supports and counseling, to help regulate his emotions to be able to attend school on a regular basis*." The IEP contained no strategies for addressing these behaviors.

Appropriate Levels of Support and Accommodations

The types of supports and accommodations students with disabilities can receive are specially designed instruction, related services, supplementary aids and services, program modifications for school staff, and accommodations in assessments. All student files contained varied amounts of direct and indirect support to be provided to students. In all but one file, accommodations were very specific and included multiple options.

A template was found in all files reviewed that included IEP services/supports necessary to implement the IEP, duration/frequency, location of services, start date, and end date. The District is to be commended for providing the template which ensures ARD committees address appropriate supports and accommodations for each student.

For students with autism, a form was included to record student-to-staff ratio recommendations for different settings. This form clearly identifies for all ARD team members when and how much support the student will receive throughout a school day. It was not noted in any of the information collected for this review if this information is utilized to inform staffing levels.

Training for staff can be a support provided through the ARD process. In two files reviewed, the need for staff training in a particular practice was specified.

There were 13 files that listed 11 to 22 accommodations to be provided to students. Tracking the effectiveness of accommodations is important; therefore, including large numbers of differing methods of supporting students may preclude reasonable monitoring of effectiveness of individual accommodations.

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Eight students whose files were reviewed received full day personal care support services.

Inclusion of Behavior Intervention Plan, if Appropriate

Three of the files reviewed contained BIPs. The BIPs contained targeted behaviors, consequences, person responsible for implementation of BIP, problem behavior, operational definition, desired replacement behavior, methods to measure weekly progress, positive strategies/ supports/interventions, strategies/interventions to use when behavior is occurring, reinforcer(s), classroom environment, classroom strategies, reward system, social skills training, consequences reasonably calculated to improve behavior given for each targeted behavior. These components included all the requirements for legally defensible BIPs.

Among the 32 files with no BIPs, there was information that appeared to support the need for behavior goals or a formal plan for behavior management:

- 1 student with multiple restraints in their record had an FBA but no BIP

- 5 students had the statement that "*child's behavior impedes his or others' learning*" but had no BIP

- 2 students were in PASS but had no BIP

Consideration of Need for Assistive Technology

IDEA defines assistive technology 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 functional capabilities of a child with a disability.*" Decisions regarding the need for assistive technology devices and services are made based on a student's ability to access the curriculum and/or their IEP goals and objectives. Six students in the sample had AT indicated. Table B-5 illustrates the distribution among the students in the files reviewed.

Table B-5. IEP File Review, Assistive Technology

Technology Level	Number of Students	Examples
Low	4	Calculator, visual supports, number line, gridded paper, word list, phonics chart, editing checklist
Medium	1	Adaptive desk/table and mobile adaptive seating
High	1	Bilateral hearing aids and a personal FM unit

- One student file indicated the student would be provided AT but the type was not specified.

- In the PLAAFP of one student file reviewed, "*little progress toward any academic goals*" was noted; however, in the AT section of the IEP there was a statement that "*the student was considered for AT but was not provided any because he was making progress*".

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- Review a file of a student who was in the HEARTS program (a program for students 18 and over) revealed that the student was currently undergoing an assistance technology evaluation and had no AT provided in 2017-18. It is not typical for an AT assessment to be conducted at such an advanced age.

Consideration of Need for Extended School Year Services

Extended School Year Services is an Individualized Education Program for children with disabilities that are provided to some students beyond the regular school year. ESYS must be considered and addressed at the student's annual ARD meeting. The need for ESYS must be discussed on an individual basis by the child's ARD committee from formal and/or informal evaluations provided by the assessment team, special education staff and/ or the parents. The documentation must demonstrate that in one or more critical areas addressed in the current IEP goals and objectives, the child has exhibited, or may be expected to exhibit, severe or substantial regression in critical skill area(s) that cannot be recouped within a reasonable period of time.

Provision of Related Services, if Appropriate

Table B-6 illustrates that among the files reviewed, related services are provided to students with disabilities in nine different categories. Since IDEA requires that students with disabilities be provided with any supportive services needed to benefit from their special education, it is inherent upon school districts to consider a variety of services. The fact that CCISD offers related services in nine categories indicates that the District is not confining their support to the most common related services.

Table B-6. Number of Students in IEP Review Sample Receiving Related Services

Related Service	Number of Students
Transportation	12
Psychological services	4
Psychological consultation	4
OT services	3
OT consultation	4
Medical/health	1
Physical therapy	1
Speech consultation	1
Adapted physical education	1

Determination for Participation in State and District Assessments

The Every Student Succeeds Act (ESSA) requires that students with disabilities participate in the same academic assessments as all other students, with only one limited exception for those students with the most significant cognitive disabilities. This means that the vast majority of students with disabilities should take the academic assessments. ESSA requires that students with disabilities be provided with appropriate accommodations.

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Additionally, ESSA requires states to provide the appropriate accommodations, such as interoperability with, and ability to use, assistive technology, for students with disabilities, including students with the most significant cognitive disabilities and students covered under Section 504 of the Rehabilitation Act, that are necessary to measure the academic achievement of such children. ARD teams are charged with determining if any adjustments need to be made to state assessments to ensure all students participate.

The files chosen for the IEP review included 24 students who would take STAAR or End-of-Course with accommodations, 4 students who would take STAAR-Alt, and 10 students were in a grade that was not tested.

Transition Plans

Transition plans were included for all of the 11 eligible students. Plans were generally well-written, comprehensive, and included the following components:

- Graduation plan

- Vocational assessment

- CTE courses needed to reach goals

- Postsecondary educational options and goals

- Learning styles inventory

- Employment goals and objectives

- Availability of age-appropriate instructional environments for students 18 years of age or older

- Independent living goals and objectives

- Reference to appropriate governmental agencies for services

- Transition services needed to reach goals

State Performance Plan Indicator 13 monitors the percentage of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated based upon age appropriate transition assessments, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition service needs. CCISD is in compliance with State Performance Plan Indicator 13. The IEP files reviewed for purposes of this review were exemplary in covering transition requirements.

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Appendix C – Parent Survey Results

Instrument Development

To assess whether parents/guardians are satisfied with the special education programs offered by Clear Creek ISD (CCISD), the review team utilized the Quality of Services Scale (QSS) created by the National Center for Special Education Accountability Monitoring (NCSEAM see *Appendix D – Parent Survey Instrument*).[40] The items that comprise the scale were developed and chosen in collaboration with special education stakeholders, including members of parent organizations, district and school staff, and state administrators, from six states. The survey was then piloted and validated by NCSEAM for states' optional use as an evaluation and improvement-planning tool. Given this extensive development, and the instrument's goal of understanding parents' perspectives of the quality of special education services, the review team proposed using this instrument in its entirely for CCISD.

In addition to the 25 items from the QSS, two summary items were included ("Overall, I am satisfied with my child's progress towards his/her IEP goals." And "Overall, I believe that my child is receiving the special education services that s/he needs."). All 27 survey items had six response categories, ranging from "very strongly disagree" to "very strongly agree". The district also used this survey as an opportunity to collect rich, open-ended feedback to three questions: two seeking recommendations for how the District could improve (special education services/programs or communications/outreach) and one seeking recognition for ways in which the schools have exceeded expectations in delivering special education services. In addition, because parent responses were connected to their student through the online survey platform, the review team was able to link parents' responses about individual students to students' demographic data extracted from the District's student information system (SIS). This negated the need to ask parents to self-report student background or demographic information.

Description of the Sampling Frame and Survey Administration Process

The review team emailed the online survey link to parents/guardians using contact information provided by CCISD.[41] Student, and thereby parent, eligibility for inclusion in the survey sampling frame was determined by whether a student had an individualized education plan (IEP) and was receiving special education services through the District on October 30th, 2018, according to district records. Thus, only parents whose students received special education services during the 2017/18 school year and who provided an email address to the District were included in the survey sample.

An email invitation was sent to each parent of a given child: if multiple parents had email addresses associated with that child, each parent received a unique email link for each child attached to them in the contact file. Separate survey links were provided to a parent with multiple children receiving special education services. The goal was to provide an opportunity for each parent to respond on behalf of each

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[40] For the duration of this report the term "parents" is inclusive of all guardian relationships.
[41] The survey was hosted on the Qualtrics survey platform.

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child, as parents' experiences with campus and district staff and services may vary by student and by parent.[42] This means that a given student can be represented by multiple survey responses (that is, two parents may have completed the survey *for the same student*), and a parent may have provided multiple survey responses (one for each of two or more children). So, while parents and students may be duplicated in the resulting datafile, they are unique within a parent-student combination.

The datafile CCISD provided to the review team contained 4,478 unique students who were receiving special education services on the eligibility determination date. The file contained parent contact information, as well as students' primary and secondary disability designation, demographic, and program membership information. Not all students had at least one parent with a valid email address in the contact list, though nearly 97 percent (4,311) did. A small number of students (318) had multiple parents with a valid email address in the parent contact file. After creating a unique parent-student link, with multiple links for parents with multiple students, the review team sent 4,629 unique parent invitations, representing 4,311 unique students.

The survey window opened on November 5th and closed on November 23rd. During this time, the review team monitored response rates and sent reminder emails to those who had not completed a survey. Ultimately the review team extended the deadline to allow for more responses and officially closed and downloaded the responses on November 26th.

Survey Response Rate and Respondent Characteristics

Parents submitted a total of 1,270[43] surveys of the 4,636 unique parent-student surveys sent, yielding a 27 percent overall response rate.[44] Twenty-nine percent of students had at least one parent respond (since some students had multiple parents receive an invitation, the overall response rate counts each parent once, and is somewhat lower than the response rate reflecting the number of students for whom at least one survey was completed). Parents sometimes skipped survey items, and two items in particular were only relevant for parents of students over 14. As such, the number of responses to each survey item varied between 552 and 1,237, but was greater than 1,100 for most.[45]

Using demographic and program membership data obtained from CCISD's administrative records, the review team compared the demographic characteristics of the students of responding parents to the full population of students who receive special education services in the District, regardless of whether they had a survey returned on their behalf. The students of parents who responded to the survey were

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[42] For instance, they may have children who attend different schools or who attend the same school but have different disabilities requiring different interventions from different school or district staff.

[43] This does not include the 148 surveys that parents submitted through the online system that did not contain responses to any of the survey questions. If those 148 are included, the response rate increases to 32 percent.

[44] In addition to the 4,629 unique parent invitations, the review team sent seven additional surveys to parents requesting one. These were not linked to student demographic records, and are therefore excluded from the analysis examining the comparability of the respondent group to the population of students in the District receiving special education services.

[45] The Complete Model Results section of this chapter includes item-level descriptive statistics along with the total number of responses to each survey item.

comparable to all students receiving special education services in the District on most demographic and program membership characteristics that were provided to the review team by CCISD, buttressing the review team's confidence in the representativeness of the results obtained from the survey (Table C-1). There were some small differences, including by school level, by some primary disabilities, and by economic status. Specifically, economically disadvantaged students receiving special education services were somewhat under-represented in the survey respondent group (36 percent compared to 41 percent in the District's special education population), a difference of five percentage points. Elementary grade students were somewhat over-represented in the respondent sample (52 percent of the survey sample, compared to 48 percent of the District population), while high school students were somewhat under-represented (26 percent in the survey sample compared to 29 percent in the District population). Students who had a learning disability were also somewhat under-represented in the survey respondent group: 29 percent of CCISD students' primary disability was a learning disability, while 24 percent of respondents' students had a learning disability as a primary disability. For all other subpopulations, differences between the respondent group and all CCISD students who received special education services were smaller than four percentage points.

Table C-1. Representativeness of Survey Respondents to the Population of Students who Received Special Education Services in CCISD

Group	District Population	Survey Sample	Percentage Point Difference
School Level			
Elementary school	47.5%	51.6%	-4.1
Middle school	23.8%	22.7%	1.1
High school	28.8%	25.7%	3.1
Primary Disability			
Orthopedic impairment	0.6%	0.8%	-0.2
Other health impairment	18.9%	20.1%	-1.2
Auditory impairment	1.9%	1.5%	0.4
Visual impairment	0.5%	0.7%	-0.2
Intellectual disability	10.3%	11.3%	-1.0
Emotional disturbance	5.3%	5.3%	0.0
Learning disability	29.0%	23.6%	5.4
Speech impairment	19.2%	19.0%	0.2
Autism	13.1%	15.6%	-2.5
Traumatic brain injury	0.1%	0.2%	-0.1
Non-categorical early childhood	1.1%	1.8%	-0.7
Economic Disadvantaged Status			
Not disadvantaged	59.5%	63.8%	-4.3
Disadvantaged	40.5%	36.2%	4.3
English Language Proficiency Status			
Not Limited English proficient	86.4%	89.4%	-3.0
Limited English proficient	13.6%	10.6%	3.0
Race			

Group	District Population	Survey Sample	Percentage Point Difference
Two or more races	4.0%	4.1%	-0.1
American Indian	0.2%	0.2%	0.0
Asian	4.6%	4.9%	-0.3
Black	11.3%	10.9%	0.4
Hispanic	37.3%	33.7%	3.6
Hawaiian and Pacific Islander	0.2%	0.2%	0.0
White	42.4%	46.2%	-3.8
Gender			
Female	33.1%	34.3%	-1.2
Male	66.9%	65.7%	1.2

Methodology

Item-level Descriptive Statistics

For each of the survey items, the review team first calculated the percentage of parents who selected each response category (e.g., the percentage that selected "very strongly disagree", "somewhat disagree", "disagree", etc.). Item-level response frequencies are included in Table C-7, along with the total number of parents answering each question (e.g., parents were instructed to skip two items if their child was younger than 14).

Quality of Special Education Services Measure

In addition to exploring the response categories that parents used for each survey item, the review team used a Rasch rating scale model for ordered categories to transform parents' raw survey response data into an interval scale score that could be used for further statistical analyses.[46] The resulting score was rescaled to range from 0-1000. The statistical method used to transform the raw scores into a continuous measure of parents' assessments of the quality of special education services also evaluates the relative difficulty of each of the 25 items on the scale. It assigns each item a quantitative score arranged on the same scale as the measure of parents' beliefs about the services provided by CCISD (Table C-2).

Items with a lower score were easier to agree with than were items with a higher score, meaning that parents were more likely to agree that schools were providing these services. This functions in the same way as the parent scores: high scores indicate parents tended to agree that more of the elements of a high-quality special education program were evident, while parents with low scores tended to disagree that these elements were evident. The easiest item, "School is a friendly place", had the highest level of agreement, while the hardest item, "School offers students opportunities to learn about students with disabilities", had the lowest level of agreement.

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[46] Additional technical and explanatory detail about this method and measures it produces is provided in the Complete Model Results section of this chapter.

Table C-2. Item Difficulty Levels of the Quality of Services Scale Obtained from the Rasch Rating Scale Model

Survey Question	Calibration Value	Percentage Agree
School is a friendly place.	454	91.7%
The principal sets a positive and welcoming tone in the school.	455	90.6%
Teachers expect my child to succeed.	458	91.1%
Teachers are knowledgeable and professional.	462	91.4%
Special education teachers make accommodations as indicated by IEP.	464	89.8%
My child's IEP tells how progress towards goals will be measured.	478	91.0%
School provides services to my child in a timely manner.	487	87.0%
School provides my child with all the services documented on my child's IEP.	488	87.7%
The principal does everything possible to support special education services.	491	86.4%
Teachers set appropriate goals for my child.	494	86.4%
School encourages student involvement in transition planning.	498	86.1%
General education and special education teachers work together to implement IEP.	501	85.0%
My child is taught in regular classes to the maximum extent appropriate.	501	83.8%
Teachers understand their role in implementing my child's IEP.	502	85.0%
Teachers understand my child's needs.	504	82.5%
Teachers show a willingness to learn more about my child's needs.	507	82.6%
Instruction provided to older students is appropriate for their age.	507	88.6%
My child receives all the supports documented in his or her transition plan.	510	82.5%
General education teachers make accommodations as indicated by IEP.	510	84.0%
My child's participation in required assessments is appropriate.	516	86.1%
My child's IEP covers all appropriate aspects of my child's development.	521	82.3%
School provides teachers and staff with training for communication with parents.	528	80.0%
The school or district evaluates whether services are effective.	540	78.7%
School ensures that after-school activities are accessible.	540	80.3%
School offers students opportunities to learn about students with disabilities.	585	69.5%

Each parent is assigned a scale score based on how they responded to these items. The score is strongly related to the raw survey scores: that is, the more items for which parents indicated agreement, the higher the scale and raw score. A parent's scale score, or group of parents' average scale score, indicates the point on the item difficulty scale at which they have a high likelihood of agreeing that the characteristic measured by the item is occurring. For instance, if a parent's scale score was 454 they were very likely to agree that "School is a friendly place", but much less likely to agree that "Teachers show a willingness to learn more about my child's need", which had a difficulty score of 507.

Analysis Methods

The review team used a combination of comparative descriptive statistics and multivariate techniques to describe parents' assessment of the quality of special education services delivered by CCISD. Results are presented both overall, as well as disaggregated by a number of salient student characteristics, including race/ethnicity, school level, participation in the free/reduced-price lunch program, and other demographic and program membership variables.

When presenting scale scores, the 99 percent confidence interval around the estimated sample mean are provided. Because the review team relied on a sample of respondents to estimate something about the population (here, parents' perceptions of the quality of special education services), the confidence interval, using the 99% confidence level, suggests that, if this survey was conducted 100 times, a scale score within the displayed range 99 out of 100 times would be obtained.[47] Particularly for the analyses using the full respondent sample, given the large sample size, stringent confidence level, and the similarity of respondents to the population of students who received special education services, the review team can be confident that the true population mean lies within the intervals displayed. However, once scale scores are analyzed by subgroups, the confidence intervals become wider. These value ranges help to illustrate that results based on small samples should be interpreted with caution.

In addition to these comparisons, the review team estimated a multivariate ordinary least squares (OLS) regression model using demographic, program membership, and primary disability information as predictors of the scale score. Using this approach allowed the review team to estimate scale score differences between disability categories and demographic subgroups while taking into account other student characteristics provided by CCISD. In other words, this model allowed the team to explore whether differences in scale scores between student subgroups—including students' primary disability category—were statistically significant, after adjusting for the influences of race, gender, disability, and other student-level information. Full model results are included at the end of this chapter.

Results

Item-level Results

Overall, parents in Clear Creek ISD were satisfied with the quality of special education services in the District. Over 90 percent of parents agreed, strongly agreed or very strongly agreed that the school is a friendly place, that teachers are knowledgeable and professional; that teachers expect students to succeed; that IEPs state how progress towards goals will be measured, and that the principal setting a positive tone. Item agreement was high across the board, with more than 80 percent of parents agreeing with all but two items. The only two items with less than 80 percent agreement included "The school or

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[47] Because the confidence interval depends on the size of the sample relative to the size of the population, the range of values will be narrower (that is, Gibson's confidence about the true value is a smaller range of numbers) when the respondent group is larger, and the range of values will be wider (that is, Gibson's confidence about the true value is a wider range of numbers) when the respondent group is smaller.

district evaluates whether services are effective" (79 percent agreement) and "The school offers students opportunities to learn about students with disabilities (70 percent agreement)". Table C-7 includes the frequency and percentage of parents who selected each response category for all survey items, along with the total number of parents who responded to each item.

Scale Score Results

Examining only the frequency of agreement to each individual item may mask subtle differences in how parents feel about the quality of special education services overall, or by student subgroups. And in fact, during examination of the psychometric properties of survey data, the review team found that parents struggled differentiating between adjacent response categories at both extremes of the scale (i.e. "Very strongly disagree", "Strongly disagree", and "Disagree"), resulting in disordered response patterns: parents with higher scale scores were not discernibly more likely to choose "Strongly agree" rather than "Very strongly agree" compared to parents with a lower scale score. To leverage the robustness of the measurement scale, the QSS scale scores generated by the Rasch model were further examined. These scale scores facilitate comparisons between groups, as the scale score represents an overall measure of the parents' perspectives on the quality of special education services.

The overall mean scale score for the District was 586. Using the item difficulty ranking provided in Table C-2 to contextualize this score, this means that parents demonstrated a high likelihood of agreement with all items included in the QSS scale. This suggests that, according to the questions used to measure parents' perceptions of the quality of special education services delivered by CCISD, most survey respondents agreed that CCISD staff were exhibiting the hallmarks of high-quality special education instruction and services. As another lens for interpretation, the District-wide median scale score was 561. Comparing this to the item difficulty list, this means about half of responding parents were likely to agree with all items except for one, "School offers students opportunities to learn about students with disabilities."

Importantly, the scale score was high for almost all student subgroups examined. Based on the multivariate model, parents of elementary-aged[48] students were statistically significantly more satisfied (609) than parents of either middle (569) or high school-aged students (555; Figure C-1).[49]

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[48] Students' school level was based on students' grade level in the administrative records. Elementary school students include early elementary, kindergarten, pre-kindergarten, and 1st through 5th grades.

[49] The Complete Model Results section of this chapter contains more information about the model. The difference between elementary and middle and high school grades was significant at the .01 level.

Figure C-1. Mean Quality of Special Education Services Scale Scores, by Students' School Level
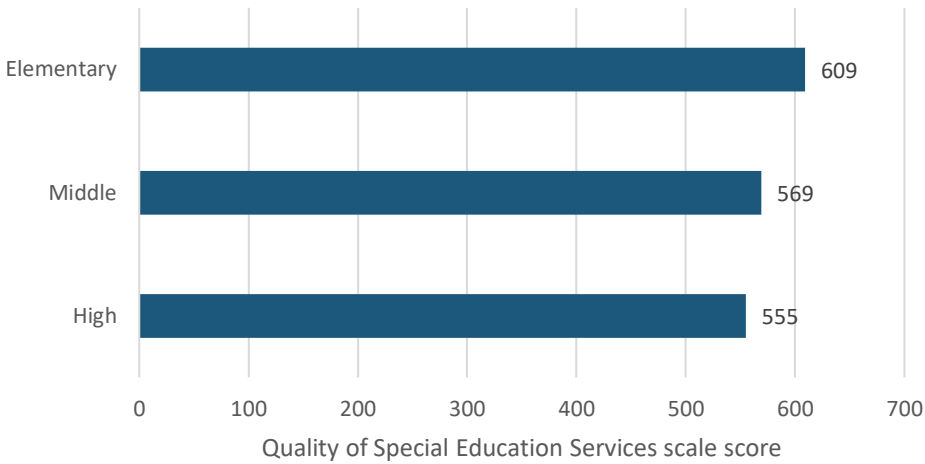
There were no statistically significant differences by student gender, by economic status, by English Proficiency status, or by race when accounting for the influence of all variables simultaneously.[50] Table C-3 displays each of these subgroup scores presented from highest scale score to lowest within each demographic variable (a coefficient table from the regression is included in Complete Model Results section of this chapter. Notably, parents of the three most common race subgroups (White, Hispanic and Black) had almost the same scale scores (584, 584 and 581, respectively), as did parents of female versus male students (586 compared to 587).

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[50] The interpretation of the race and primary disability category coefficients is a bit more complex since there are more than two groups for each. Additional statistical tests were ran to compare each disability subgroup to each other.

Table C-3. Mean QSS Scale Score, by Student Demographic and Program Membership Characteristics

Subgroup	Scale Score	Number of Respondents	Confidence Interval
Race			
Asian	634	61	586- 682
Two or more races	597	52	543- 651
White	584	583	568- 601
Hispanic	584	426	563- 604
Black	581	139	546- 616
English language proficiency status			
Limited English proficient	614	134	577- 652
Not limited English proficient	583	1131	571- 595
Economic disadvantaged status			
Not economically disadvantaged	597	456	576- 617
Economically disadvantaged	581	809	567- 594
Gender			
Male	587	832	572- 601
Female	586	433	567- 605

Note. Confidence interval calculated using a 99 percent confidence level. Results from two race/ethnicity groups, American Indian and Hawaiian and Pacific Islander, had fewer than five respondents and are not shown to protect student confidentiality.

The multivariate model did show one statistically significant difference by disability subgroup, with parents of students with a learning disability having a significantly higher scale score than parents of students with a primary disability of other health impairment. For categorical indicators, such as race/ethnicity or primary disability, the regression model only compares each subgroup to a reference category (in this case parents with a student with a learning disability, which was the most frequent disability category among respondents). Additional statistical tests (i.e., pairwise comparisons[51]) were ran to check if there were other important differences. None of the other pairwise comparisons were significant, meaning there were no other differences that reached statistical significance.

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[51] The test evaluates the equivalence of two coefficient estimates (e.g., the difference in scale score between parents with a student who has autism and parents with a student who has visual impairment) using a Wald test. It is analogous to testing whether the difference between the two coefficients is equal to zero.

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Table C-4. Mean Quality of Special Education Services Scale Score, by Students' Primary Disability

Subgroup	Scale Score	Number of Responses	Confidence Interval
Noncategorical early childhood	628	23	552- 704
Speech impairment	612	240	586- 637
Visual impairment	600	9	461- 738
Intellectual disability	596	143	562- 630
Learning disability	592	298	568- 616
Autism	583	200	555- 611
Auditory impairment	575	19	488- 661
Emotional disturbance	561	67	508- 613
Other health impairment	558	254	532- 583
Orthopedic impairment	548	10	442- 655

Note. Confidence interval calculated using a 99 percent confidence level. One disability category with fewer than five responses, traumatic brain injury, is not shown to protect student confidentiality.

QSS scores by school were also examined. This provides some feedback regarding whether there are some schools with more or less satisfied parents than others. If so, schools with high scores can serve as exemplars, and the District may look to those schools for sharing out best or promising practices. In contrast, schools with lower scores may benefit more from examination of where their parents were less likely to agree with statements to inform potential areas for improvement efforts.

Arlyne and Alan Weber Elementary school had the highest QSS score across all schools (703), which was more than 30 points higher than the next highest school, Lavace Elementary (669). Among secondary schools, Clear Creek Intermediate had the highest QSS score at 645, which was higher than many other elementary schools. Clear View High School had the highest QSS score among high schools (617), although this school had few responses (7). Schools with the lowest QSS scores were Victory Lakes Intermediate (529) and Space Center Intermediate, Seabrook Intermediate and Clear Creek High School (542). Table C-5 shows scale score results for all schools, along with the 99 percent confidence interval around the estimated mean. Notably, while parents of elementary-aged children had the most positive perspectives on quality of services on average, John Ward Elementary had one of the lowest QSS scores in the District.

Table C-5. Mean QSS Scale Score, by Campus

School Name	Average Scale Score	Number of Responses	Confidence Interval
Arlyne and Alan Weber EL	703	25	636- 769
Lavace Stewart EL	669	14	580- 758
Margaret S McWhirter EL	667	16	585- 748
North Pointe EL	648	17	550- 747
Clear Lake City EL	647	20	550- 743
Clear Creek Int.	645	21	561- 729
G H Whitcomb EL	636	23	565- 708
Art and Pat Goforth EL	635	34	563- 707

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School Name	Average Scale Score	Number of Responses	Confidence Interval
Wedgewood EL	632	21	556- 709
Henry Bauerschlag EL	629	38	568- 691
League City EL	617	23	538- 696
Clear View HS	617	7	476- 759
P H Greene EL	614	30	532- 696
Walter Hall EL	613	30	545- 680
Falcon Pass EL	612	38	552- 671
Brookside Int.	610	28	543- 677
Ralph Parr EL	609	33	546- 671
Bay EL	608	22	516- 700
Creekside Int.	606	42	540- 671
Armand Bayou EL	606	16	493- 719
C D Landolt EL	597	22	501- 693
James H Ross EL	593	29	531- 655
Lloyd R Ferguson EL	589	28	500- 678
Darwin L Gilmore EL	577	29	500- 654
I W and Eleanor Hyde EL	575	41	511- 639
Brookwood EL	574	23	503- 645
Clear Lake Int.	573	39	506- 640
Westbrook Int.	571	24	479- 662
G W Robinson	571	19	468- 675
Clear Springs HS	568	75	522- 614
Sandra Mossman EL	565	26	493- 638
Clear Lake HS	562	33	475- 650
League City Int.	560	14	434- 686
Ed H White EL	555	11	455- 655
Clear Falls HS	554	75	507- 601
Clear Creek HS	546	70	498- 594
Bayside Int.	546	21	471- 620
John F Ward EL	543	24	434- 652
Space Center Int.	542	27	476- 608
Seabrook Int.	542	21	474- 610
Clear Brook HS	542	63	486- 597
Victory Lakes Int.	529	47	485- 574

Note. Confidence interval calculated using a 99 percent confidence level. Two campuses—Clear Horizons Early College and Clear Path Alternative School—had fewer than five survey responses and are not shown to preserve student anonymity.

Parents who indicated that their student received services in another school district did not have a statistically significantly different average QSS score than those whose children did not receive services in another school district (590 compared to 586, respectively).

Complete Model Results

Understanding the Quality of Services of Scale Score

Parents' raw score survey responses were transformed into an interval scale using the Rasch rating scale model in WINSTEPS. The score is a quantitative representation of the underlying trait that the instrument is intended to measure: parents' opinion about the quality of special education services provided by CCISD. The Rasch method of transformation is consistent with the original design and validation of the instrument: similar to a standardized test, such as the State of Texas Assessment of Academic Readiness (STAAR) that measures students' mathematics or reading ability, the quality of services scale includes questions with varying difficulty levels. Some items, for instance, ask about behaviors or conditions that are less prevalent in most schools and districts, while some are more prevalent. All items, however, represent features of a special education program that experts and special education stakeholders have determined are integral to provide high-quality services to parents and students who receive special education services.

Simply examining raw scores (that is, summing the numerical responses to each survey item, where the minimum is 25 and the maximum is 125) disregards the different difficulty levels of the items that comprise the scale and: it treats the difference in a score between 25 and 30 the same as the difference in a score between 120 and 125. This is misleading, however, since differences in the underlying trait being measured at these two points in the scale are not equivalent, even though the raw score differences (five raw score points) are identical. This is because a response of, say, "Very strongly agree" to one item conveys more information about the quality of special education services than that same response for a different item due to question being asked, in just the same way a student getting the two most difficult items on a math test correct provides more information about a students' math knowledge than when a student gets two of the easiest items correct.

Scale Optimization

The Rasch analysis, in conjunction with the descriptive statistics of the raw survey data, revealed that parents' struggled differentiating between adjacent response categories at both extremes of the scale (i.e. "Very strongly disagree", "Strongly disagree", "Agree"), resulting in disordered response patterns. This disordering suggests that the six-point response scale contains unnecessary response options for measuring parents' perceptions of the quality of special education services since, for a given item, they were not consistently able to discriminate between extreme options when assessing whether a service or condition was present in CCISD. Furthermore, the disordering complicates interpretation. Thus, responses from six categories were collapsed to three based on the psychometric characteristics of the survey response data for the QSS scale. The response options were collapsed to three categories: "Very strongly

disagree, strongly disagree, disagree", "Agree", and "Very strongly agree, strongly agree" during the Rasch scaling process.

Psychometric Properties

The QSS exhibited strong psychometric properties. The person measure reliability for the 1,270 extreme and non-extreme person measures was .91, and the separation ratio, or *G* statistic, was 3.2. The separation reliability for the 25 items comprising the QSS scale was .98, and the *G* statistic was 7.9. Chronbach's Alpha was .98.

Model Estimating Scale Differences by Subgroup

To test whether there were statistically significant differences in parents' QSS scale scores by student characteristics, a multivariate ordinary least squares (OLS) regression model was examined. The model included students' school level, primary disability, race, economic disadvantage status, English language proficiency, and gender as covariates for 1,265 survey responses. The results are presented in Table C-6. Each coefficient indicates how much higher (or lower) the scale score is compared to the excluded category, or reference group, after accounting for the contribution of the other covariates included in the model. For example, parents of middle school students' perceptions of the quality of special education services in CCISD were 36 scaled score points lower than those of parents of elementary school students. The only statistically significant differences were that parents of middle and high school students were likelier to have lower scaled scores than parents of elementary students and students with a learning disability had a higher scaled score than parents of students with other health impairment.

Table C-6. Multivariate Regression Model Results

Covariate	Coefficient	Standard Error	p-value
Middle school vs elementary	-36.33	12.02	p<0.01
High school vs elementary	-53.54	11.87	p<0.001
Orthopedic impairment vs. learning disability	-45.38	50.31	n.s.
Other health impairment vs. learning disability	-41.38	13.63	p<0.01
Auditory impairment vs. learning disability	-25.71	37.03	n.s.
Visual Impairment vs. learning disability	2.248	53.07	n.s.
Intellectual Disability vs. learning disability	-1.546	16.05	n.s.
Emotional Disturbance vs. learning disability	-36.13	21.34	n.s.
Speech Impairment vs. learning disability	-12.73	15.01	n.s.
Autism vs. learning disability	-23.68	14.98	n.s.
Traumatic Brain Injury vs. learning disability	76.54	111.5	n.s.
Noncategorical early childhood vs. learning disability	-0.677	34.70	n.s.
Economic disadvantaged vs. not economically disadvantaged	5.576	9.907	n.s.
Limited English proficient vs. not limited English proficient	15.63	15.77	n.s.
Two or more vs. White	16.14	22.66	n.s.
American Indian vs. White	-106.7	110.9	n.s.

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Covariate	Coefficient	Standard Error	p-value
Asian vs. White	33.91	22.53	n.s.
Black vs. White	-2.105	15.19	n.s.
Hispanic vs. White	-8.343	10.60	n.s.
Hawaiian and Pacific Islander vs. White	-67.39	111.3	n.s.
Male vs. female	0.570	9.566	n.s.
Constant	622.6	13.81	p<0.001
Observations	1,265		
R-squared	0.041		
n.s.=not significant			

Table C-7. Item-level Descriptive Statistics

Question	Very Strongly Disagree	Strongly Disagree	Disagree	Agree	Strongly Agree	Very Strongly Agree	N
Special education teachers make accommodations as indicated by IEP.	45 (3.6%)	34 (2.7%)	47 (3.8%)	446 (36.1%)	303 (24.5%)	362 (29.3%)	1,237
General education teachers make accommodations as indicated by IEP.	43 (3.5%)	44 (3.6%)	108 (8.8%)	488 (39.9%)	255 (20.9%)	284 (23.2%)	1,222
General education and special education teachers work together to implement IEP.	45 (3.7%)	35 (2.9%)	104 (8.5%)	467 (38.1%)	241 (19.7%)	334 (27.2%)	1,226
Instruction provided to older students is appropriate for their age.	29 (2.5%)	29 (2.5%)	75 (6.4%)	550 (47.3%)	215 (18.5%)	265 (22.8%)	1,163
The principal sets a positive and welcoming tone in the school.	42 (3.4%)	21 (1.7%)	52 (4.2%)	420 (34.3%)	268 (21.9%)	421 (34.4%)	1,224
The principal does everything possible to support special education services.	55 (4.6%)	31 (2.6%)	78 (6.5%)	445 (37.0%)	236 (19.6%)	357 (29.7%)	1,202
The school or district evaluates whether services are effective.	60 (4.9%)	52 (4.3%)	146 (12.0%)	471 (38.8%)	194 (16.0%)	291 (24.0%)	1,214
My child receives all the supports documented in his or her transition plan.	28 (4.4%)	27 (4.2%)	57 (8.9%)	254 (39.6%)	103 (16.1%)	172 (26.8%)	641
My child's IEP tells how progress towards goals will be measured.	32 (2.6%)	22 (1.8%)	56 (4.6%)	526 (43.0%)	242 (19.8%)	344 (28.2%)	1,222
My child's IEP covers all appropriate aspects of my child's development.	43 (3.6%)	36 (3.0%)	135 (11.2%)	476 (39.4%)	206 (17.1%)	312 (25.8%)	1,208
My child's participation in required assessments is appropriate.	43 (3.6%)	32 (2.7%)	90 (7.6%)	536 (45.2%)	186 (15.7%)	300 (25.3%)	1,187
My child is taught in regular classes to the maximum extent appropriate.	49 (4.1%)	36 (3.0%)	109 (9.1%)	430 (35.9%)	226 (18.9%)	348 (29.0%)	1,198
School is a friendly place.	32 (2.6%)	17 (1.4%)	53 (4.3%)	454 (36.7%)	246 (19.9%)	434 (35.1%)	1,236
School provides services to my child in a timely manner.	41 (3.4%)	29 (2.4%)	88 (7.2%)	456 (37.5%)	232 (19.1%)	371 (30.5%)	1,217
School provides my child with all the services documented on my child's IEP.	34 (2.8%)	23 (1.9%)	92 (7.6%)	471 (38.9%)	229 (18.9%)	362 (29.9%)	1,211
School provides teachers and staff with training for communication with parents.	53 (4.6%)	45 (3.9%)	133 (11.5%)	437 (37.8%)	205 (17.7%)	284 (24.5%)	1,157
School offers students opportunities to learn about students with disabilities.	61 (5.4%)	47 (4.2%)	234 (20.9%)	421 (37.6%)	136 (12.1%)	221 (19.7%)	1,120
School ensures that after-school activities are accessible.	52 (4.7%)	39 (3.5%)	129 (11.6%)	477 (42.8%)	154 (13.8%)	264 (23.7%)	1,115
School encourages student involvement in transition planning.	22 (4.0%)	12 (2.2%)	43 (7.8%)	245 (44.4%)	90 (16.3%)	140 (25.4%)	552
Teachers are knowledgeable and professional.	29 (2.4%)	25 (2.0%)	52 (4.2%)	469 (38.3%)	248 (20.2%)	403 (32.9%)	1,226
Teachers understand my child's needs.	46 (3.8%)	32 (2.6%)	135 (11.1%)	417 (34.2%)	235 (19.3%)	355 (29.1%)	1,220
Teachers understand their role in implementing my child's IEP.	42 (3.5%)	32 (2.6%)	109 (9.0%)	465 (38.2%)	209 (17.2%)	360 (29.6%)	1,217
Teachers show a willingness to learn more about my child's needs.	47 (3.9%)	32 (2.6%)	132 (10.9%)	423 (35.0%)	207 (17.1%)	369 (30.5%)	1,210
Teachers set appropriate goals for my child.	39 (3.2%)	24 (2.0%)	102 (8.4%)	463 (38.3%)	221 (18.3%)	360 (29.8%)	1,209
Teachers expect my child to succeed.	39 (3.2%)	16 (1.3%)	53 (4.4%)	437 (36.2%)	237 (19.6%)	425 (35.2%)	1,207
Overall, I am satisfied with my child's progress towards his/her IEP goals.	53 (4.3%)	32 (2.6%)	132 (10.7%)	465 (37.9%)	200 (16.3%)	346 (28.2%)	1,228

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Question	Very Strongly Disagree	Strongly Disagree	Disagree	Agree	Strongly Agree	Very Strongly Agree	N
My child is receiving the special education services that s/he needs.	62 (5.1%)	38 (3.1%)	141 (11.6%)	417 (34.3%)	194 (15.9%)	365 (30.0%)	1,217
			No	Yes			N
Has your child received services in a district other than Clear Creek ISD?			882 (71.4%)	353 (28.6%)			1,235

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Appendix D – Parent Survey Instrument

Gibson Consulting Group is conducting a review of the overall effectiveness and efficiency of Clear Creek ISD's special education program and services. As part of that review we are seeking your input.

Why am I receiving this survey? You are receiving this survey because you are a parent/guardian of a current Clear Creek ISD student receiving special education services.

How long will this survey take? The survey will take approximately 5 minutes to complete.

What is the purpose of this survey? The purpose of this survey is to learn about parent/guardian perceptions about the quality of special education services provided by schools in Clear Creek ISD. Your responses will help guide efforts to improve services and results for children and families.

Who is being asked to complete this survey? All parents/guardians of students currently receiving special education services in Clear Creek ISD are being asked to complete this survey. Your participation is completely voluntary. You may skip any questions you do not want to answer.

Will your responses be kept confidential? We will keep your identity and the information that you share confidential, to the extent permitted by law. Only the research team at Gibson Consulting Group will have access to your identifiable responses. Survey data will be aggregated and summarized when reported because the focus of the review is on the overall program, NOT individual students, campuses, or staff.

How will results be reported? Information you provide will be combined across all input received from Clear Creek ISD parents/guardians. No individually identifiable data will be included in the report. For example, feedback may be provided to the district such as the percentage of parents who responded a certain way or the mean rating parents gave to various survey items.

Questions? If you have any questions, contact the Gibson Consulting Group Project Manager, Cheyanne Rolf at crolf@gibsonconsult.com.

Please answer the questions on this survey about your experiences with your student's school, teachers, and special education services received.

For each of the following question sets, indicate the extent to which you agree or disagree with the statements.

If there are any statements you feel you cannot answer, simply skip the statement and do not provide a response.

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q1. Please indicate the extent to which you agree or disagree with the following statements.

	Very Strongly Disagree	Strongly Disagree	Disagree	Agree	Strongly Agree	Very Strongly Agree
Special education teachers make accommodations and modifications as indicated on my child's IEP.	○	○	○	○	○	○
General education teachers make accommodations and modifications as indicated on my child's IEP.	○	○	○	○	○	○
General education and special education teachers work together to assure that my child's IEP is being implemented.	○	○	○	○	○	○
Instruction provided to older students is appropriate for their age.	○	○	○	○	○	○
The principal sets a positive and welcoming tone in the school.	○	○	○	○	○	○
The principal does everything possible to support appropriate special education services in the school.	○	○	○	○	○	○
The school or district evaluates whether special education services are effective.	○	○	○	○	○	○
My child receives all the supports documented in his or her transition plan. (Skip if child is 13 or younger)	○	○	○	○	○	○
My child's IEP tells how progress towards goals will be measured.	○	○	○	○	○	○
My child's IEP covers all appropriate aspects of my child's development.	○	○	○	○	○	○
My child's participation in required assessments (e.g., district/statewide) is appropriate.	○	○	○	○	○	○
My child is taught in regular classes, with supports, to the maximum extent appropriate.	○	○	○	○	○	○

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q2. My child's school...

	Very Strongly Disagree	Strongly Disagree	Disagree	Agree	Strongly Agree	Very Strongly Agree
...is a friendly place.	○	○	○	○	○	○
...provides services to my child in a timely manner.	○	○	○	○	○	○
...provides my child with all the services documented on my child's IEP.	○	○	○	○	○	○
...provides teachers and staff with training to improve their communication with parents.	○	○	○	○	○	○
...offers students without disabilities, and their families, opportunities to learn about students with disabilities.	○	○	○	○	○	○
...ensures that after-school and extracurricular activities are accessible to students with disabilities.	○	○	○	○	○	○
...encourages student involvement in transition planning.	○	○	○	○	○	○

q3. Teachers at my child's school...

	Very Strongly Disagree	Strongly Disagree	Disagree	Agree	Strongly Agree	Very Strongly Agree
...are knowledgeable and professional.	○	○	○	○	○	○
...understand my child's needs.	○	○	○	○	○	○
...understand their role in implementing my child's IEP.	○	○	○	○	○	○
...show a willingness to learn more about my child's needs.	○	○	○	○	○	○
...set appropriate goals for my child.	○	○	○	○	○	○
...expect my child to succeed.	○	○	○	○	○	○

q4. Indicate the extent to which you agree or disagree with the following statements.

	Very Strongly Disagree	Strongly Disagree	Disagree	Agree	Strongly Agree	Very Strongly Agree
Overall, I am satisfied with my child's progress towards his/her IEP goals.	○	○	○	○	○	○
Overall, I believe that my child is receiving the special education services that s/he needs.	○	○	○	○	○	○

q5. Has your child received special education services in a district other than Clear Creek ISD?

○ Yes

○ No

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q6. In what ways could the *district* improve its special education programs and/or services?

q7. In what ways could the *district* improve communications and/or outreach to parents/guardians of students receiving special education services?

q8. Are there any areas in which you feel the *school* is exceeding expectations with respect to special education programs and/or services? If so, please tell us about it.