Special Education Review
Final Report

Prepared for:
Westerville City School District

August 2022

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Chapter 1 – Introduction

Westerville City School District (herein referred to as "WCSD" or "the District") contracted with Gibson Consulting Group, Inc. (Gibson) to conduct a comprehensive review of the District's special education program and services. Gibson conducted this review over an 11-month period between July 2021 and June 2022. Drawing on information gathered from extant data, documents, a staff survey, individual and group interviews, an IEP file review, and observations of 43 classrooms across 9 campuses, this report describes Gibson's assessment of WCSD's strengths and areas in need of improvement with respect to its special education program, and identifies recommendations for WCSD to consider as it continues its efforts to improve services to students with disabilities (SWD) in the District.

Gibson wishes to thank the WCSD leadership and staff for their assistance in conducting this review.

Executive Summary

Westerville City School District (WCSD) is located northeast of Columbus, Ohio, in the northern Franklin and southern Delaware counties. It encompasses 52-square miles and is the 10th largest district in the State. In 2021-22, WCSD enrolled 14,994 students in Grades Pre-K through 12 in 15 elementary schools, four middle schools, three high schools, and a preschool program located at the Early Learning Center (ELC). At the time of this review, 2,222 special education students accounted for 14.8% of WCSD's student population; students with a Section 504 plan represented 4.4% of the student population.

WCSD has a diverse student population, and the profile of students with disabilities (SWD) closely mirrors that of the non-disabled student population with regard to race/ethnicity. Students who are economically disadvantaged or male are over-represented in the special education population. However, the demographic profile of students with a Section 504 Plan does not mirror that of the non-disabled population. White students are significantly overrepresented, while Black/African American, economically disadvantaged, or English-learner students are underrepresented.

According to State data, WCSD students performed above the State average in all grade levels and content areas but generally performed below other "similar districts."[1] This context suggests that WCSD's Tier 1 instruction contributes to the academic performance of SWD, whose performance trends generally mirrored that of non-disabled students (although a wide performance gap exists). SWD in WCSD generally performed above the comparator districts in all content areas at the elementary level but then performed below the comparator districts at the middle school level. On the end-of-course (EOC) assessments, SWD in WCSD outperformed comparator districts in Geometry and Algebra and performed below the comparator districts in all other content areas. Like all school systems across the country, academic performance in WCSD trended downward the last two years due to the COVID-19 pandemic when many students were learning remotely.

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[1] https://reportcard.education.ohio.gov/district/achievement/045047.

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This report contains 19 recommendations to improve the effectiveness and efficiency of the WCSD's Special Education program. Below is a brief summary of the major observations and recommendations included in this report.

- A central office that is organized efficiently and effectively plays an essential role in supporting improvement at the school level. This assessment identified several organizational misalignments that, if addressed, would improve oversight and accountability of key functions. Most notably, it is recommended that the Teaching and Learning Department be reorganized to align Special Education, Section 504, Gifted and Talented, and English-Learner (EL) programs under a new Executive Director of Specialized Learning. The District's preschool program would also be realigned under Special Education.

- Overall, the Special Education Department received positive feedback on the staff survey from school-based stakeholders with regard to their accessibility and responsiveness. However, there are opportunities to improve program accountability by shifting some responsibilities away from the Special Education coordinators to campus administrators (e.g., attendance at ETR/IEP meetings).

- More than half (50.5%) of all staff that responded to the survey do not feel that their daily workload is manageable within the school day. To help address this issue, the Special Education Department should routinely calculate staffing workloads, as required by the Ohio Department of Education (ODE), to inform staffing allocations.

- Despite being audited by ODE, the District continues to be challenged with the implementation of a Multi-tiered System of Supports (MTSS) to provide early intervention supports to students who are struggling academically or behaviorally. More than 30% of staff that responded to the survey indicated that their campus does not have a clear and effective process for providing academic interventions. While WCSD is commended for utilizing several universal screeners to identify students at risk of learning difficulties, data show that the referral rates and quality of referrals to special education vary. The provision of professional development, standard operating procedures, and curricula for Tier 2 and Tier 3 interventions are needed to improve MTSS practices districtwide.

- Student-level data show that the percentage of students in more inclusive settings has increased, which is a favorable trend. However, District practices for documenting minutes of service in student IEPs make it difficult to accurately calculate least restrictive environment (LRE) and ultimately determine appropriate staffing levels. Several recommendations are made to address this issue.

- WCSD invests heavily in implementing a Team Teach instructional model (i.e., two certified teachers are in a classroom bell-to-bell), yet insufficient support and guidance are provided to campuses to implement this model effectively. This report recommends that the District implement Team Teach in the core content areas of English Language Arts (ELA) and Math only, limit the practice of providing SDI outside of the general education classroom (when Team Teach is occurring), and support campuses in developing master schedules that allow for collaborative planning time to occur regularly and within the contract day.

- With the exception of general education classrooms and cross-categorical classrooms, SWD are placed in specialized learning classrooms (SLCs) according to their disabling condition. This

practice is stigmatizing and may pose compliance risks with an Individuals with Disabilities Education Act (IDEA) provision that requires that consideration must be given to "*each child's unique educational needs and circumstances, rather than by the child's category of disability.*" Although some changes to SLCs are planned for next year, it is recommended that the Department make additional changes so that SLCs reflect the level of supplementary aids and services that will be provided in the class rather than the disability of the students in the class.

▪ The role of the central office should be to ensure that systems and structures are in place so that all professional learning is high-quality and aligned to district initiatives and/or priorities and to the specific learning needs of individuals. Professional development opportunities are not meeting the needs of instructional and support staff working with SWD, evidenced by staff feedback provided during interviews and on the staff survey. A professional learning system plan is needed to ensure that professional learning is informed by student needs and aligned to the priorities of the school system.

Addressing these and other recommendations in this report will help WCSD improve programs and services for all students, including SWD.

Project Objectives and Scope

As described in the District's Request for Proposals (RFP), WCSD sought an independent review of its Special Education Department to examine the provision of educational services and determine the effectiveness of individualized services to students with special education needs. As such, the scope of this review included an assessment of current program offerings, continuum of services, monitoring and compliance, related professional development, and consistency and articulation between schools, resources, and parent relations.

The main goals of this comprehensive review are to:

▪ Evaluate the design, structure, and established processes of educational services offered by WCSD in meeting the needs of SWD and the degree of fidelity of implementation of special education services at schools, including Response to Intervention (RTI) and Multi-Tiered Systems of Supports (MTSS) programs, as well as the continuous monitoring of the effectiveness of the processes.

▪ Evaluate the adequacy of human capital resources assigned to special education students, the organizational structure, and the level of professional development they receive (staffing and organization of special education personnel).

▪ Analyze to what degree the implementation of special education services at schools aligns with evidence-based practices.

▪ Speak with all stakeholders and evaluate the effectiveness of communication strategies to keep stakeholders informed about services for SWD (community relations and customer service).

▪ Review of the record-keeping system for special education.

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- Cost analysis of the provision of a comprehensive special education program (budget management, cost analysis overview, Medicaid reimbursement).

- Review of pre-Special Education interventions and eligibility process.

This work aims to improve procedures and align resources so that all identified students receive high-quality special education services. The District leadership team intends to use the results of this review to develop a strategic plan for special education.

Approach and Methodology

The findings and recommendations included in this report were informed by the following data collection and analytical activities.

Extant Data and Document Analysis

Gibson collected and analyzed more than 200 documents and data files for the 2016-17 through 2021-22 academic years. Below is a summary of the information provided to the review team:

- **Program Policy and Guidance documents** – such as relevant Board policies (Local); strategic planning documents; standard operating procedures for special education, Multi-Tiered System of Supports (MTSS) and/or Response to Intervention (RTI); special education compliance and/or corrective action reports; and, State Performance Plan (SPP) indicator data.

- **Financial Data** – such as program budget and expenditure data, Individuals with Disabilities Education Act Part B (IDEA-B) Maintenance of Effort (MOE) calculation worksheets, and revenues related to Medicaid reimbursements.

- **Program Information** – such as a description of WCSD's instructional arrangements and service delivery models, specialized program offerings, curriculum and instructional materials, professional development offerings, Child Find data, and WCSD parent survey results.

- **Student Data** – such as student race/ethnicity, gender, grade, primary disability, socioeconomic status, limited English proficiency (LEP) status, instructional arrangement; discipline data; extended school year (ESY) participation data; State assessment data; and progress monitoring data.

- **Employee Data** – such as organizational charts, job descriptions, position roster data, teacher certification data, teacher experience and turnover statistics, caseload and workload statistics, staffing allocation formulas and/or ratios, and samples of teacher schedules.

- **School Enrollment and Performance Data** – such as student demographics, campus accountability/performance ratings, Title I status, campus location/geographic region, specialized program offerings, school feeder patterns, bell schedules, and a sample of Campus Improvement Plans (CIPs) or other annual planning documents.

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Comparator District Analysis

To provide additional context, Gibson benchmarked WCSD to five districts that are similar in size, student demographics, and overall performance (Table 1). Comparator districts were selected in collaboration with WCSD. Data for benchmarking was obtained from the Ohio Department of Education (ODE) and publicly available information on district websites. It is important to note that Gibson conducts benchmark analyses to provide context and does not draw conclusions based on any singular benchmark or indicator.

Table 1. Profile of Comparator Districts, 2020-21[2]

District	Region	Enrollment	Pct. Eco Dis	Pct. SWD	Pct. EL
South-Western City	Franklin	21,612	50.2%	17.2%	14.3%
Lakota Local	Butler	16,418	15.6%	9.8%	7.5%
Hilliard City	Franklin	16,014	17.4%	14.4%	8.6%
Westerville City	Franklin	14,562	29.9%	13.8%	9.6%
Pickerington Local	Fairfield	10,471	28.0%	13.4%	4.6%
Worthington City	Franklin	10,410	22.8%	14.4%	6.3%

Source: Ohio Department of Education

Individualized Education Program (IEP) File Review

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. Generally, a quality IEP complies with all federal and state requirements 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 review of 20 student IEPs, which represents approximately one percent of SWD. Selection of individual students was judgmental, applying specific criteria to ensure that the sample size included SWD across school levels, primary disability, and instructional setting.[3] The review team was provided read-only access to the District's special education student information system, *IEP Anywhere,* to review IEPs. Table 2 provides a profile of the IEPs reviewed.

Table 2. Profile of IEPs Included in the File Review

School	Grade	Primary Disability	Instructional Setting	Special Category
Cherrington ES – 1 Mark Twain ES – 1 McVay ES – 2	Kindergarten – 1 Grade 3 – 1 Grade 4 – 1	Multiple Disabilities – 2 Emotional Disturbance – 2 Cognitive Disabilities – 2	Outside Regular Class <21% – 8	LEP – 3

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[2] Figures available from ODE will differ somewhat from the student-level data provided by WCSD. For this reason, ODE data is used when comparing WCSD to other districts.

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

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School	Grade	Primary Disability	Instructional Setting	Special Category
Pointview ES – 1 Whittier ES – 1 Blendon MS – 1 Heritage MS – 3 Walnut Springs HS – 1 Central HS – 4 North HS – 3 South HS – 1 Boundless (OOD) – 1	Grade 5 – 1 Grade 6 – 2 Grade 7 – 2 Grade 8 – 3 Grade 9 – 1 Grade 10 – 4 Grade 11 – 1 Grade 12 – 3	Specific Learning Disabilities – 5 Autism – 5 Other Health Impaired (Minor) – 4	Outside Regular Class 21% to 60% – 7 Outside Regular Class >60% – 5	

Source: WCSD

The IEP review was conducted using a rubric developed by Gibson to assess the quality of student Present Levels of Academic Achievement and Functional Performance (PLAAFP) statements; annual measurable goals and objectives; progress reporting; time, place, frequency, and duration of services; related services and supplementary aids and services; accommodations on State and District assessments; transition plans; and, whether or not annual revision timelines were met. Results of the IEP audit were tabulated and aggregated to identify areas where compliance and/or quality standards are not being consistently met.

Individual and Group Interviews

The review team conducted 17 individual interviews and 12 group interviews with the Superintendent, District administrators, Westerville Education Association (WEA) representatives, Special Education Department administrators and staff, related service providers, school counselors, campus administrators, special education teachers, general education teachers, and instructional aides. The primary purpose of the individual and group interviews was to gain a deeper understanding of the WCSD's special education programs and services and to gather anecdotal information from key stakeholders regarding their perceptions of program strengths and opportunities for improvement. A complete list of the interviewees and group sessions can be found in *Appendix A – Interviews and Campus Visits*.

School Visits and Classroom Observations

Classroom observations were an important component of this evaluation as they enabled the review team to observe first-hand the delivery of instruction to SWD. In January 2022, the review team visited four elementary schools, two middle schools, two high schools, and the Early Learning Center (ELC), where they conducted eight additional interviews with campus administrators and visited up to four classrooms at each campus (for a total of 43 classrooms observations). Schools visited were selected in consultation with Department leadership and were chosen based on their geographic location, student demographics, and school performance. The review team made every effort to observe the different instructional settings on each campus (e.g., inclusion, resource, self-contained). Results of the classroom observations were then tabulated and aggregated to discern notable trends and patterns across campuses and instructional arrangements.

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Staff Survey

Gibson developed and administered an online survey to all campus-based administrators, teachers, paraprofessionals, licensed special education service providers, and other student support services staff who work directly or indirectly with SWD. The survey was designed to capture how WCSD staff perceive the current delivery of special education programs and services for SWD at their campus and the broader conditions within the district and at campuses that may impact the effective or efficient delivery of those services.

The survey was administered using *Qualtrics*, an online survey platform. The survey instrument included 92 items and incorporated a seven-point rating scale. For reporting purposes, the seven-point rating scale was consolidated into three categories: Agree (strongly agree, agree, slightly agree), Disagree (slightly disagree, disagree, strongly disagree), and Don't Know (don't know or not applicable). In analyzing survey response data, the review team recommends that the District explore areas where disagreement rates exceed 20%, and consider addressing with more urgency any areas where disagreement rates exceed 30%. Survey responses are included throughout this report to support the discussion of specific topics. The staff survey results are included in *Appendix C – Staff Survey*.

The staff survey was administered between March 8 and March 18, 2022. In total, 804 staff completed the survey for an overall response rate of 58.7 percent. Tables 3 details the survey response rates by position type.

Table 3. Staff Survey Response Rates by Position Type

Position Type	Total Surveyed	Response Rate
GenEd or Other Teacher	768	53.0%
Instructional Specialist	166	84.3%
Special Education Instructional Aide	178	47.2%
Licensed Special Education Service Provider	74	89.2%
Other Student Support Services Staff	116	49.1%
Campus Administrator	39	74.4%
Other	28	75.0%
Total Staff Surveyed	**1,369**	**58.7%**

Source: Gibson Consulting Group Staff Survey

Gibson also disaggregated and analyzed staff survey responses according to school level and school. Table 4 below shows the survey response rates by school level.

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Table 4. Staff Survey Response Rates by School Level

School Level	Total Surveyed	Response Rate
Preschool	37	67.6%
Elementary School	527	60.3%
Middle School	271	60.1%
High School	371	54.2%
More than One Campus	145	60.0%
Not Reported	18	55.6%
Total Staff Surveyed	**1,369**	**58.7%**

Source: Gibson Consulting Group Staff Survey

Interpreting Survey Response Data

A survey response rate is defined as the number of people in the sample who successfully complete the survey. Having a high survey response rate is important, as it is more likely that the responses are representative of the total population of interest. In theory, response rates can range anywhere from zero percent to 100 percent. However, most literature suggests that average response rates tend to fall between 20 and 30 percent and that response rates below 10 percent are considered very low. In comparison, response rates above 50 percent are considered very good.[4] In general, there are a variety of factors that can influence survey response rates, such as the survey itself (e.g., survey type, clarity of instructions, question-wording, length of the survey), respondents (e.g., motivation to complete the survey, an invitation to complete the survey), or survey management (e.g., the confidence of anonymity, reminder emails, and follow-up).

Gibson makes every effort to facilitate high survey response rates. For this review, the staff survey instrument was vetted by WCSD administrators to ensure that survey instruction, question-wording, format, and survey length were appropriate; automated reminder emails were sent to non-respondents. However, the staff survey results presented in this review should be interpreted with caution. Results are not intended to be statistically significant or representative of the entire population of interest. The survey results are meant to show patterns in response to various questions about the District's special education programs and services by those individuals who completed the survey.

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

- Chapter 2 – Student Profile

- Chapter 3 – Department Organization and Program Management

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[4] https://www.qualtrics.com/experience-management/research/tools-increase-response-rate/.

- Chapter 4 – Student Identification, Evaluation, and Placement

- Chapter 5 – Program Design and Implementation

- Appendices

    - Appendix A – Interviews and Campus Visits

    - Appendix B – IEP File Review

    - Appendix C – Staff Survey

    - Appendix D – Key Terms

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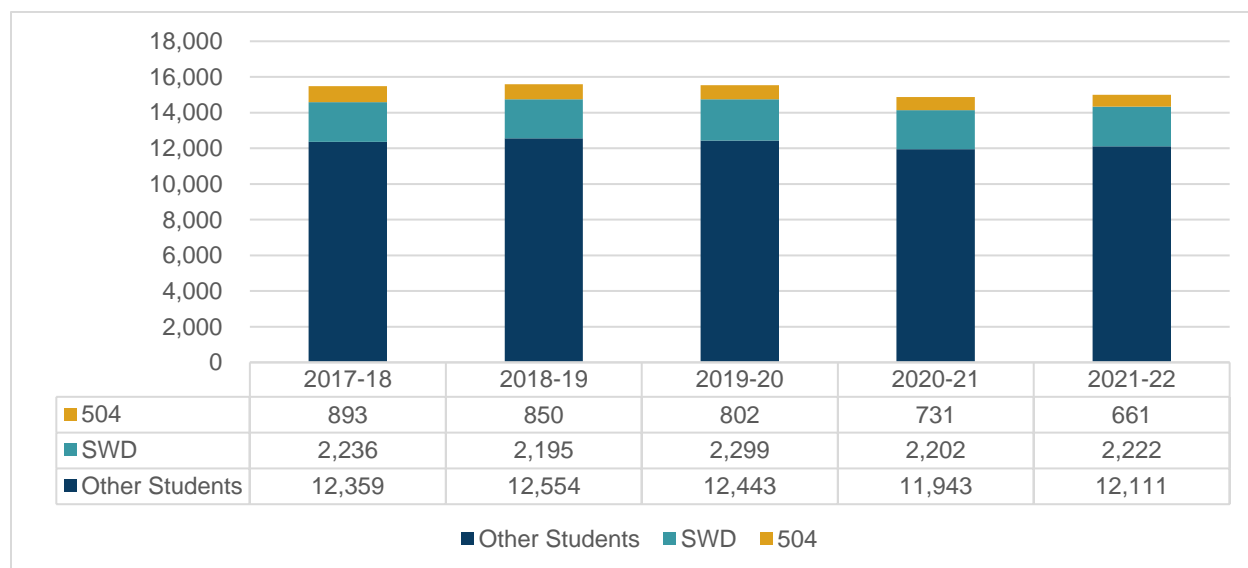
Chapter 2 – Student Profile

This Chapter provides an overview of Westerville City School District (WCSD) student enrollment and academic performance in order to set the context for the findings and recommendations contained in subsequent chapters of this report.

Student Enrollment

Westerville City School District is located northeast of Columbus, Ohio, in the northern Franklin and southern Delaware counties. It encompasses 52-square miles and is the 10th largest district in the State. In 2021-22, WCSD enrolled 14,994 students in Grades Pre-K through 12 in 15 elementary schools, four middle schools, three high schools, and a preschool program located at the Early Learning Center (ELC).

Over the past five years, WCSD's total student enrollment decreased 3.2% (494 students). Like many school systems across the country, WCSD experienced declining enrollment from 2019-20 to 2020-21 due to the COVID-19 pandemic (Figure 1). In 2021-22, students with disabilities (SWD) accounted for 14.8% of the student population, while students on a 504 Plan accounted for 4.4%.

Figure 1. WCSD Student Enrollment, 2017-18 to 2021-22

|	2017-18	2018-19	2019-20	2020-21	2021-22
504	893	850	802	731	661
SWD	2,236	2,195	2,299	2,202	2,222
Other Students	12,359	12,554	12,443	11,943	12,111

Source: WCSD Student Enrollment Data (DR #33/34 Revised)

Note: "Other Students" refers to students who are not identified as SWD or Section 504.

Figure 2 below compares the percentage of SWD in WCSD to each of the comparator districts and to the State average.[5] Representation of SWD in WCSD is 1.4 percentage points below the State average (15%) and very near the average of the comparator districts (13.8%).

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[5] Figures available from ODE will differ somewhat from the student-level data provided by WCSD. For this reason, ODE data is used when comparing WCSD to other districts.

Figure 2. Percent of Students with Disabilities by Comparator District, 2021-22
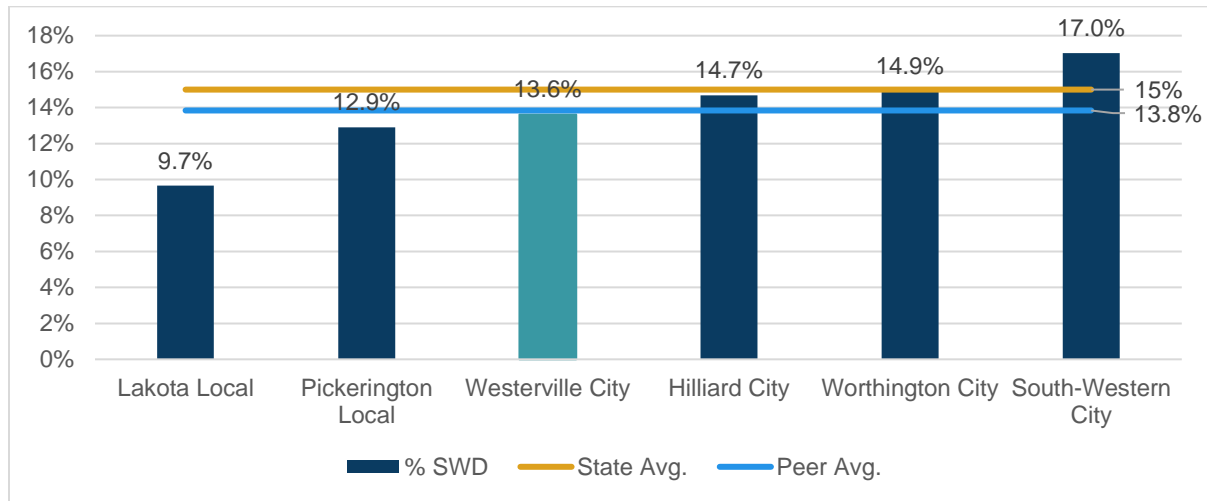
Source: ODE October Headcount Report, FY22

Figure 3 shows the total number of students in WCSD at each grade. WCSD promotes students in high school based solely on earned credits. Students need 5.0 to move to Grade 10, 10.0 to move to Grade 11, and 15.0 to move to Grade 12. The peak in Grade 9 enrollment is a reflection of students who lag in the required number of earned credits but then ultimately catch up with their credits the following year.

Figure 3. WCSD Student Enrollment by Grade, 2021-22
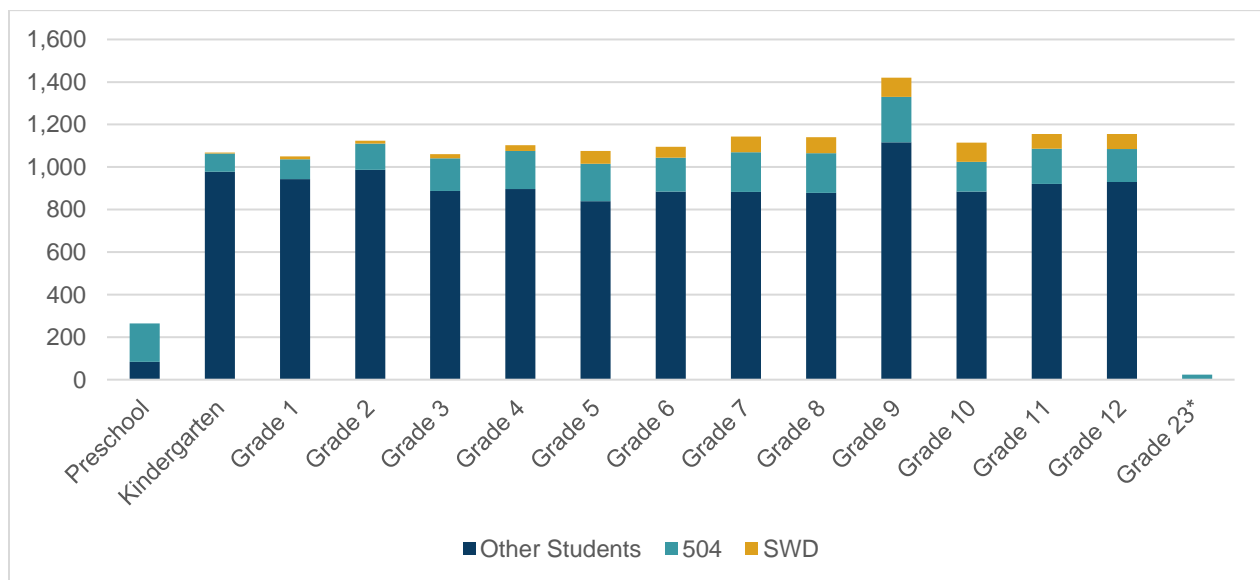
Source: WCSD Student Enrollment Data (DR #33/34 Revised)

*Grade 23 represents SWD who are under age 22 and have completed their graduation requirements but not yet received a diploma.

Academic Performance

Ohio's Learning Standards identify what students need to know and be able to do, and the Ohio State Tests (OST) measure how students are progressing through the standards. The State test results also help measure each public school's performance, which is reflected on its annual Ohio School Report Card.

Students in Grades 3 through 8 are administered the OST in English language arts (ELA) and mathematics, and students in Grades 5 and 8 are administered the OST in science. End-of-course (EOC) assessments are administered to secondary students in ELA I and II, algebra I, geometry (or integrated mathematics I and II), biology or physical science (class of 2018 only), American history, and American government.

Ohio's Alternate Assessment for Students with Significant Cognitive Disabilities (AASCD) is aligned to Ohio's Learning Standards–Extended (OLS-E) and designed to allow students with significant cognitive disabilities to demonstrate their knowledge and skills in an appropriately rigorous assessment. The AASCD is administered to students in ELA and mathematics in Grades 3, 4, 6, and 7. Students in Grades 5 and 8 are assessed in ELA, mathematics, and science. Students taking the HS-AASCD are assessed in English language arts, mathematics, science, and social studies.

The following figures and tables show the percentage of students with disabilities who scored Proficient or Above for each of the tested subjects and grades compared to non-disabled students in WCSD over a five-year period and compared to SWD in the benchmark districts. Four-year graduation rates are also presented in this section.

English Language Arts (ELA)

As shown in Figure 4 below, grade-level trends in academic performance on the ELA OST for WCSD's disabled students closely mirrors that of non-disabled students in Grades 3 and 4. However, in Grade 5 academic performance of non-disabled students trends upward while the academic performance of disabled students trends downward. A similar pattern is observed in Grade 7, where the performance gap is widest (53.4 percentage points).

Figure 4. English Language Arts – WCSD Percent of Students Proficient or Above, 2020-21
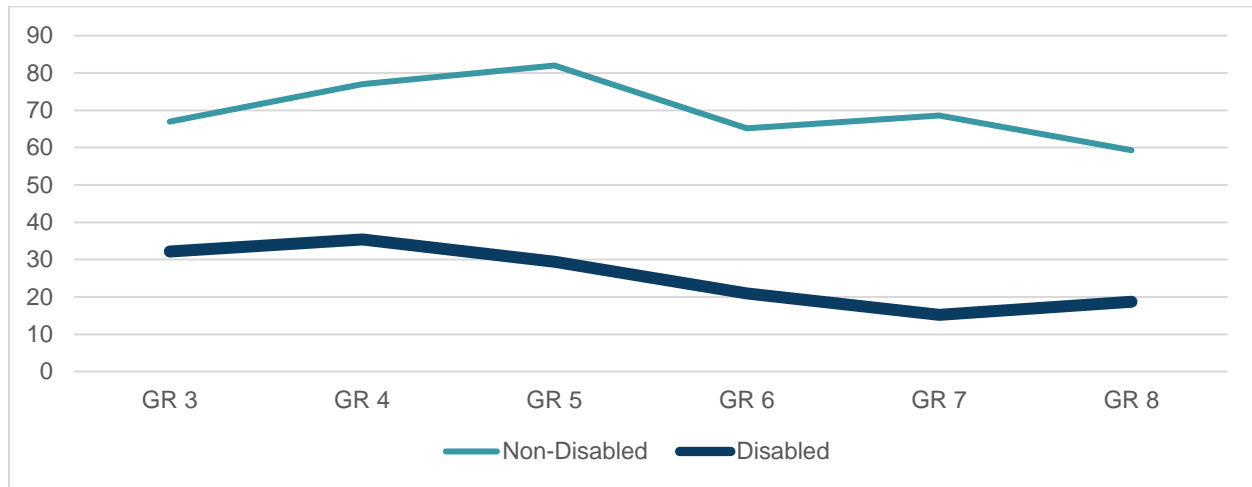
Source: ODE School Report Card, 2020-21

On average, the percentage of SWD that scored Proficient or Above on the OST in ELA decreased at every grade level from 2016-17 to 2020-21.

Figure 5. English Language Arts – WCSD Percent of SWD Proficient or Above, 2016-17 to 2020-21*
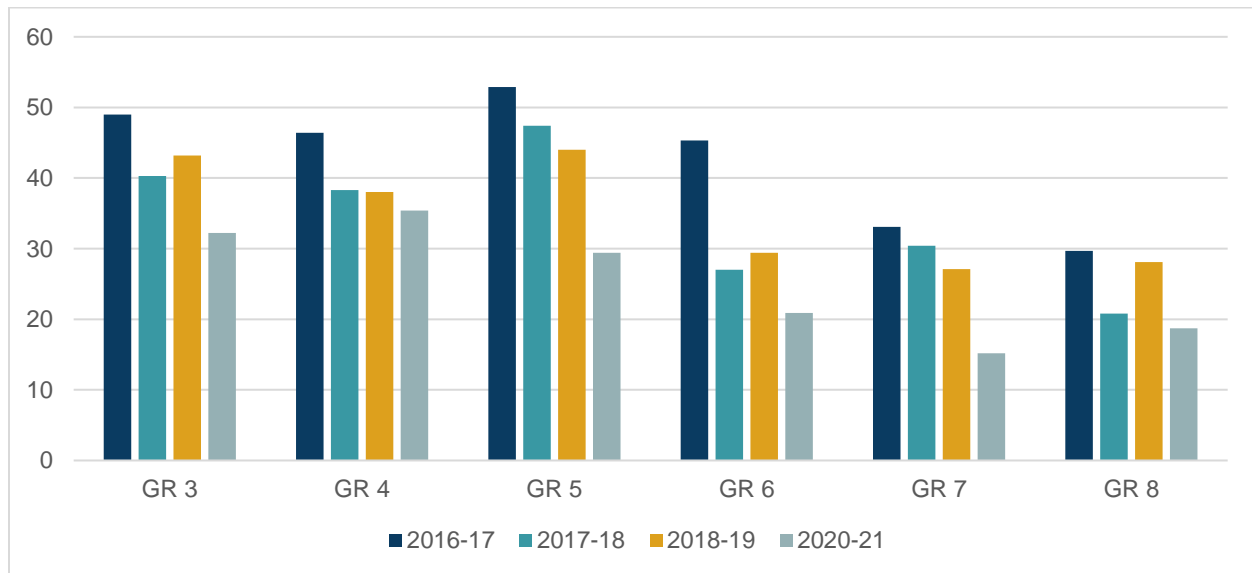
Source: ODE School Report Cards

*OST results for 2019-20 are not reported for any content area due to the Covid-19 pandemic.

WCSD ranks second amongst the comparator districts for SWD in Grades 3 and 4, but then ranks near the bottom of the comparator districts in Grades 5 through 8. WCSD performance also trends in the opposite direction of the comparator districts in Grades 5 and 7.

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Figure 6. English Language Arts – Percent of SWD Proficient or Above, 2020-21

	GR 3	GR 4	GR 5	GR 6	GR 7	GR 8
Westerville City	32.2	35.4	29.4	20.9	15.2	18.7
South-Western City	11.5	16.3	18.9	7.6	12.2	8.4
Worthington City	33.7	37.9	50	24.1	26.1	15.9
Lakota Local	21.7	34.1	41.4	26	20	20
Pickerington Local	25.8	22	29.9	15.4	33.9	25.3
Hilliard City	23.3	34	40.4	20	27.5	19.6

Source: ODE School Report Card, 2020-21

Mathematics

Grade-level trends on the Math OST for WCSD's disabled students more closely mirrors that of non-disabled students (Figure 7). The performance gap is also widest in Grade 7 (43.6 percentage points) but then narrows in Grade 8 (27.5 percentage points).

Figure 7. Math – WCSD Percent of Students Proficient or Above, 2020-21
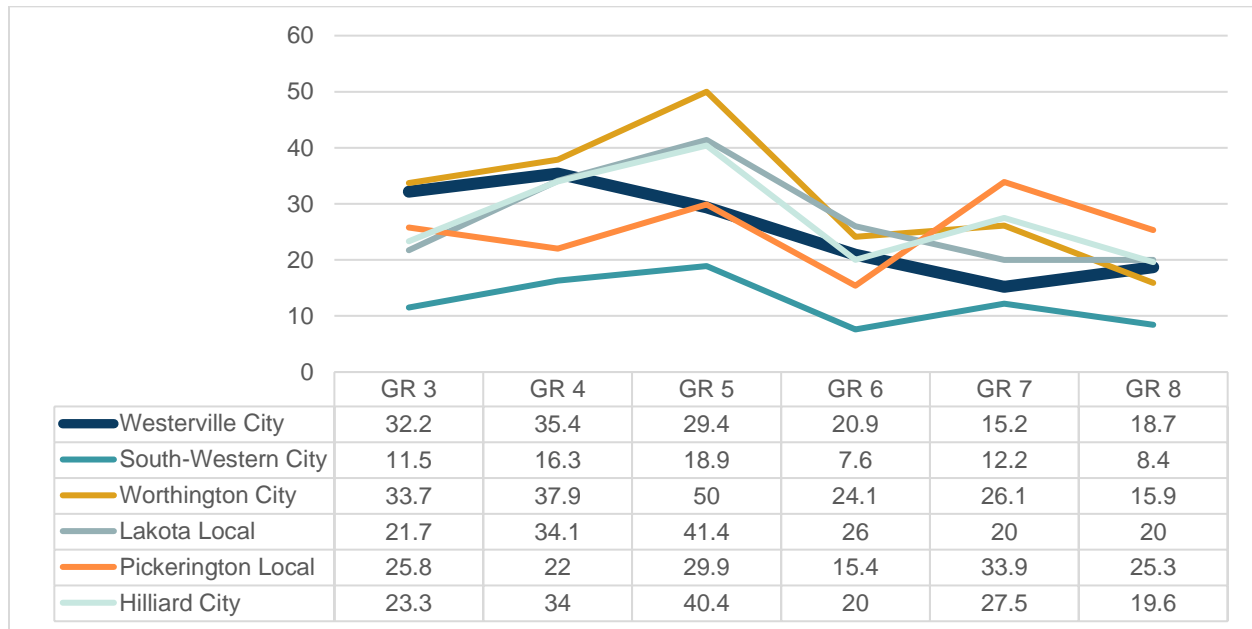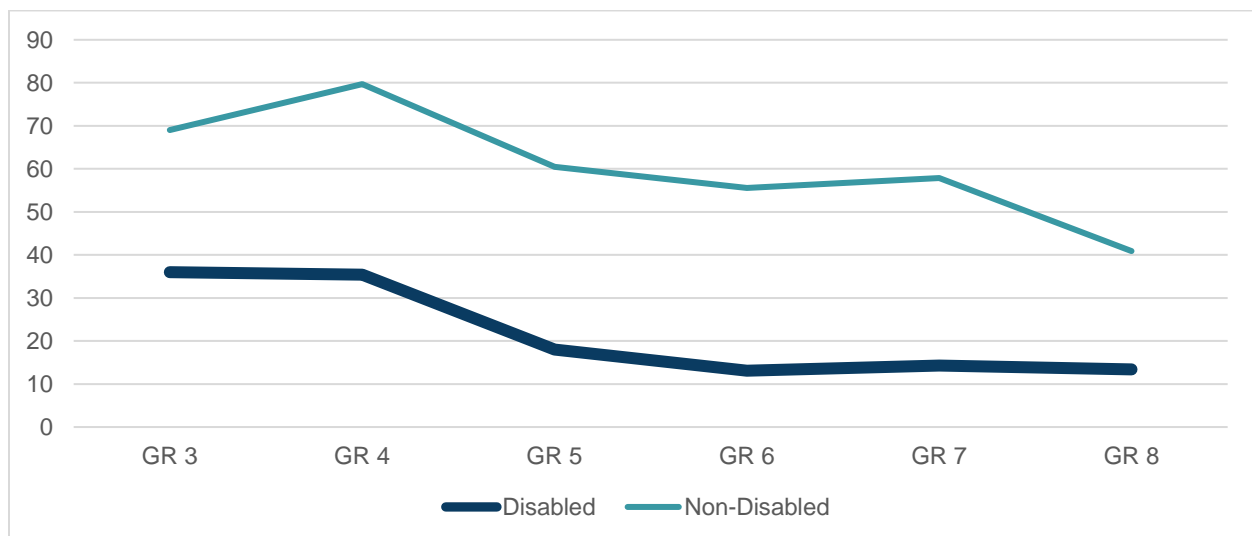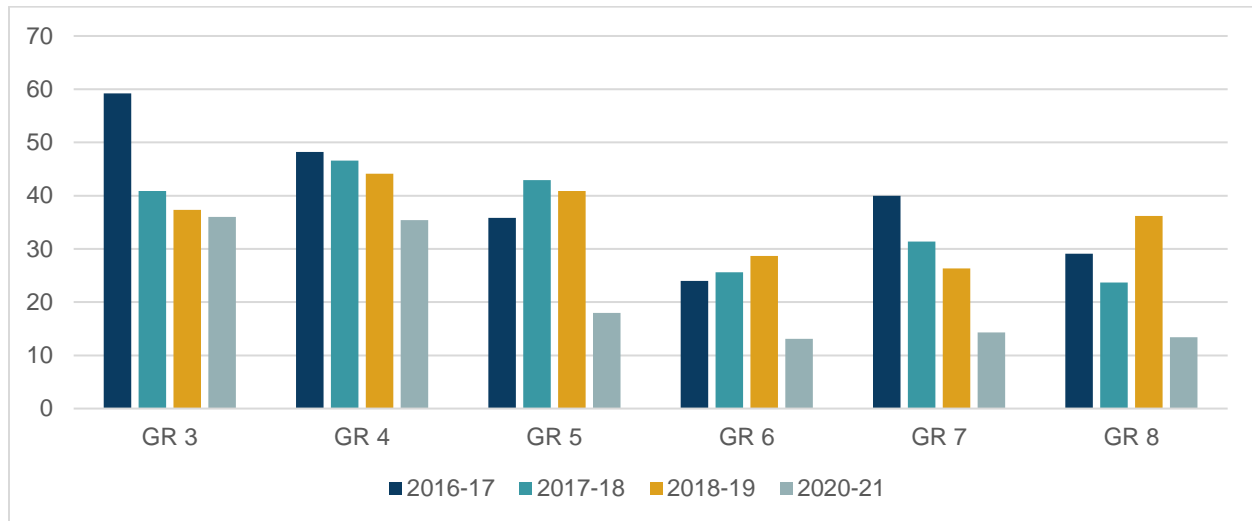

Source: ODE School Report Card, 2020-21

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On average, the percentage of SWD that scored Proficient or Above on the OST in Math decreased year over year in Grades 3, 4, and 7. Performance was trending upward in Grades 5, 6, and 8 prior to 2020-21, when there was a sharp decrease in Grades 5, 6, 7, and 8, likely due to learning loss that occurred during the pandemic.

Figure 8. Math – WCSD Percent of SWD Proficient or Above, 2016-17 to 2020-21*

Source: ODE School Report Cards

*OST results for 2019-20 are not reported for any content area due to the Covid-19 pandemic.

WCSD ranks first amongst the comparator districts in Grade 3 on the Math OST but then ranks either fourth or fifth in Grades 5 through 8.

Figure 9. Math – Percent of SWD Proficient or Above, 2020-21

	GR 3	GR 4	GR 5	GR 6	GR 7	GR 8
Westerville City	36	35.4	18	13.1	14.3	13.4
South-Western City	16.3	19.9	13.4	7.6	9.9	12
Worthington City	33	38.3	27.7	19	28	17.5
Lakota Local	34.6	37.9	36.2	29.8	14.3	14.3
Pickerington Local	27.1	30.8	17.5	14.6	15.5	21.6
Hilliard City	31.3	38.9	19.9	23.8	20.4	22.4

Source: ODE School Report Card, 2020-21

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Science

Grade-level trends on the Science OST for WCSD's disabled students more closely mirrors that of non-disabled students (Figure 10). The performance gap widens slightly from Grade 5 (39.5 percentage points) to Grade 8 (41.1 percentage points).

Figure 10. Science – WCSD Percent of Students Proficient or Above, 2020-21

Source: ODE School Report Card, 2020-21

On average, the percentage of SWD that scored Proficient or Above on the OST in Science is trending downward in Grade 5 and upward in Grade 8 until 2020-21.

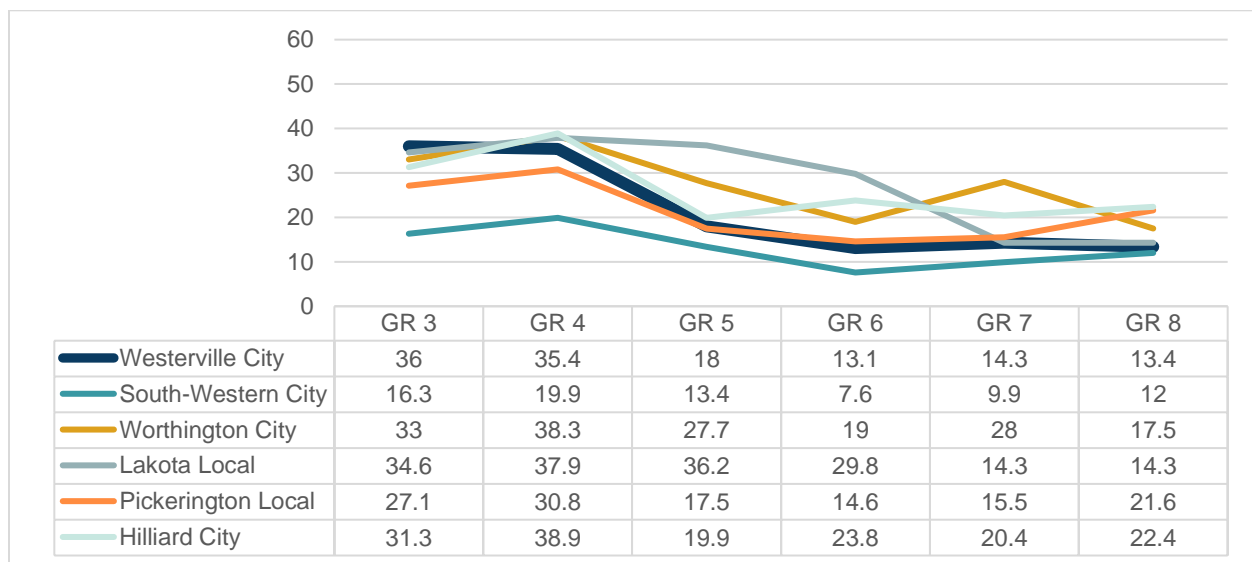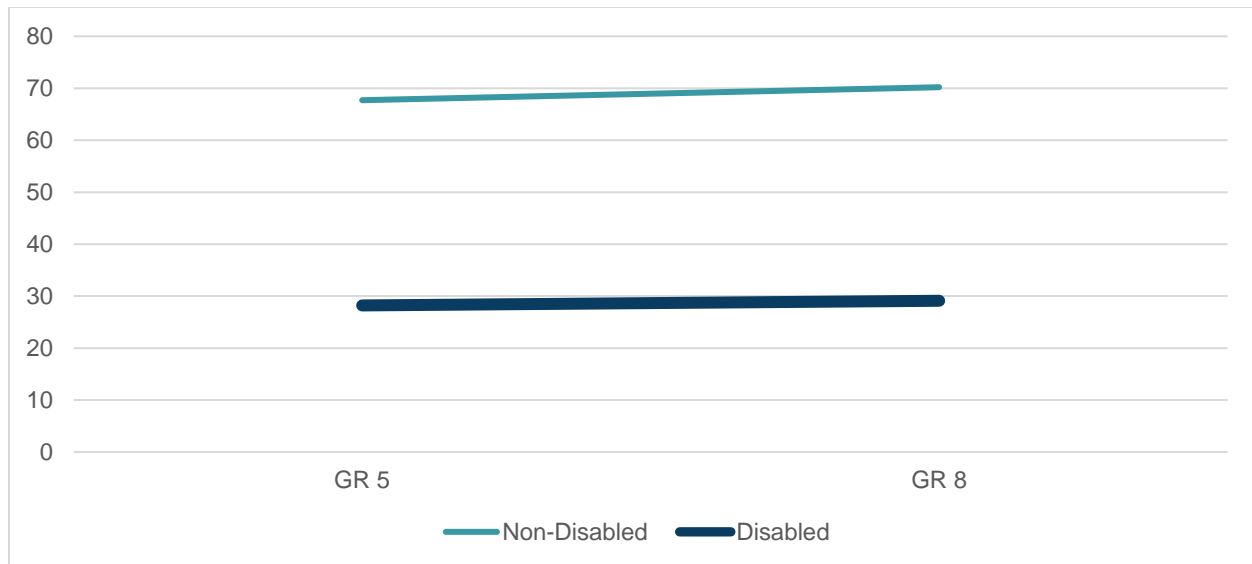**Figure 11. Science – WCSD Percent of SWD Proficient or Above, 2016-17 to 2020-21***
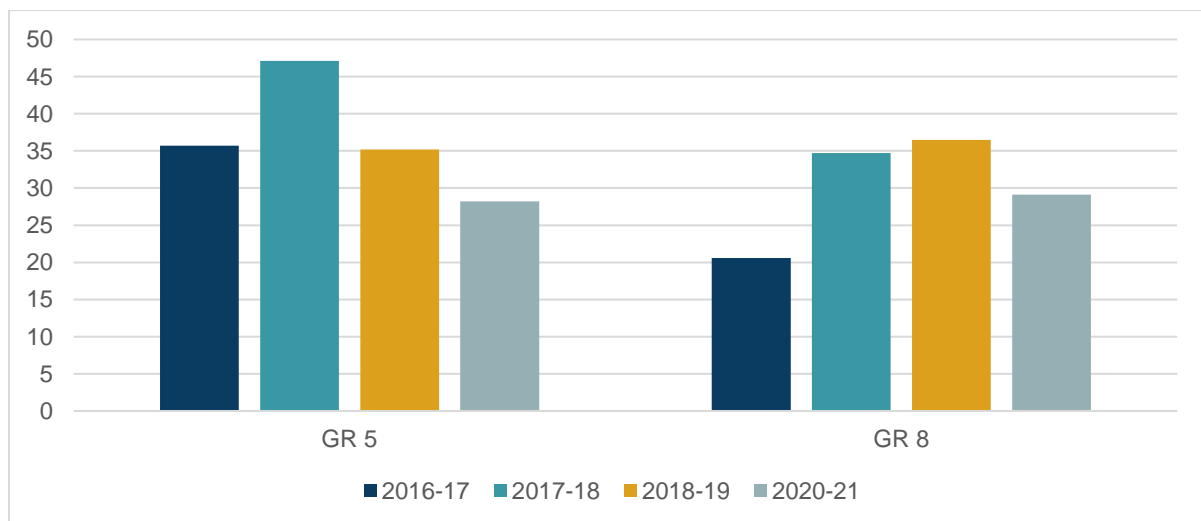
Source: ODE School Report Cards

*OST results for 2019-20 are not reported for any content area due to the Covid-19 pandemic.

WCSD ranks near the bottom of the comparator districts on the Science OST (Figure 12).

Figure 12. Science – Percent of SWD Proficient or Above, 2020-21

	GR 5	GR 8
Westerville City	28.2	29.1
South-Western City	18.1	22.3
Worthington City	44.9	30.6
Lakota Local	48.8	30.6
Pickerington Local	45.8	28.3
Hilliard City	36.5	40.9

Source: ODE School Report Card, 2020-21

End-of-Course (EOC)

The following figure shows the percentage of SWD who scored Proficient or Above on the EOC for each tested subject. The performance gap is widest in ELA (50 percentage points).
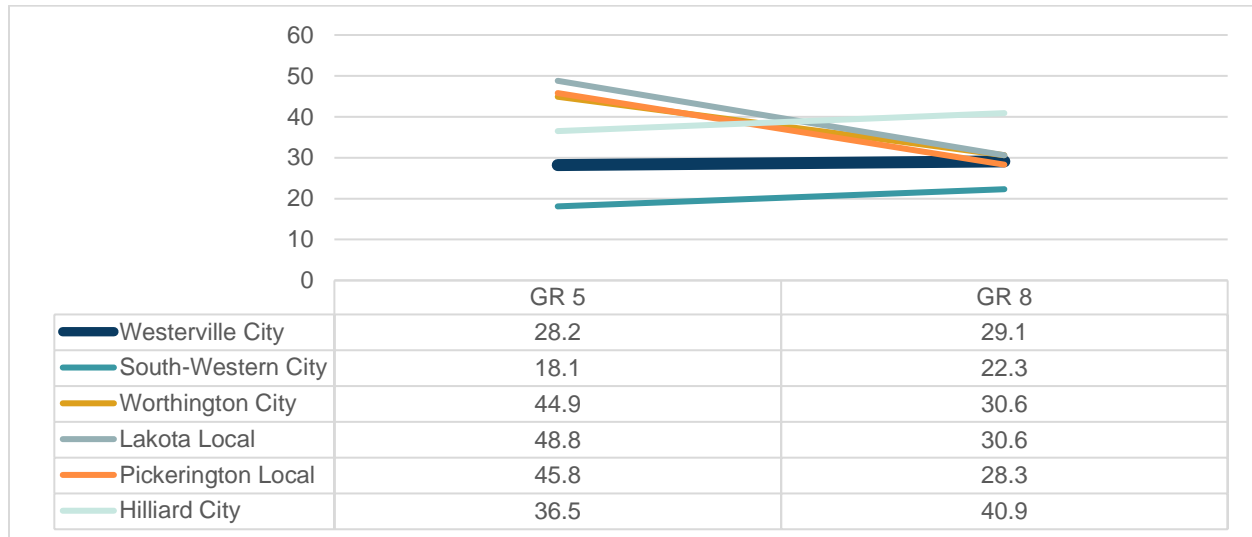
Figure 13. End of Course (EOC) – Percent of Students Proficient or Above, 2020-21
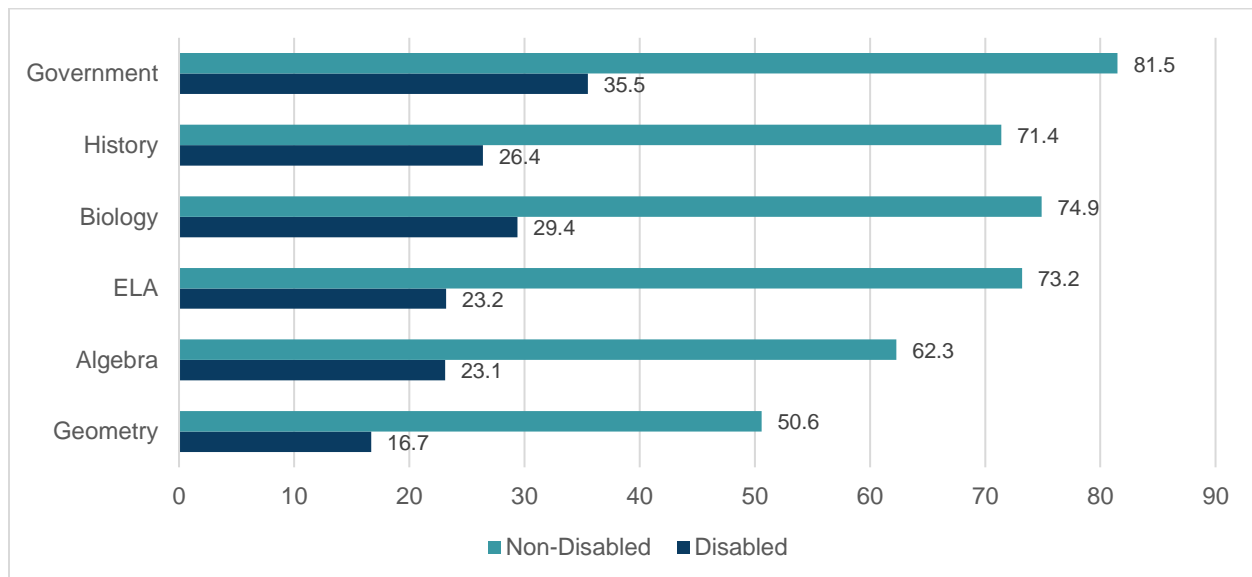
Source: ODE School Report Card, 2020-21

Performance trends on the EOC vary by subject area. In all subjects, the percentage of students that scored Proficient or Above decreased from 2018-19 to 2020-21.

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Figure 14. End of Course (EOC) – Percent of SWD Proficient or Above, 2016-17 to 2020-21*
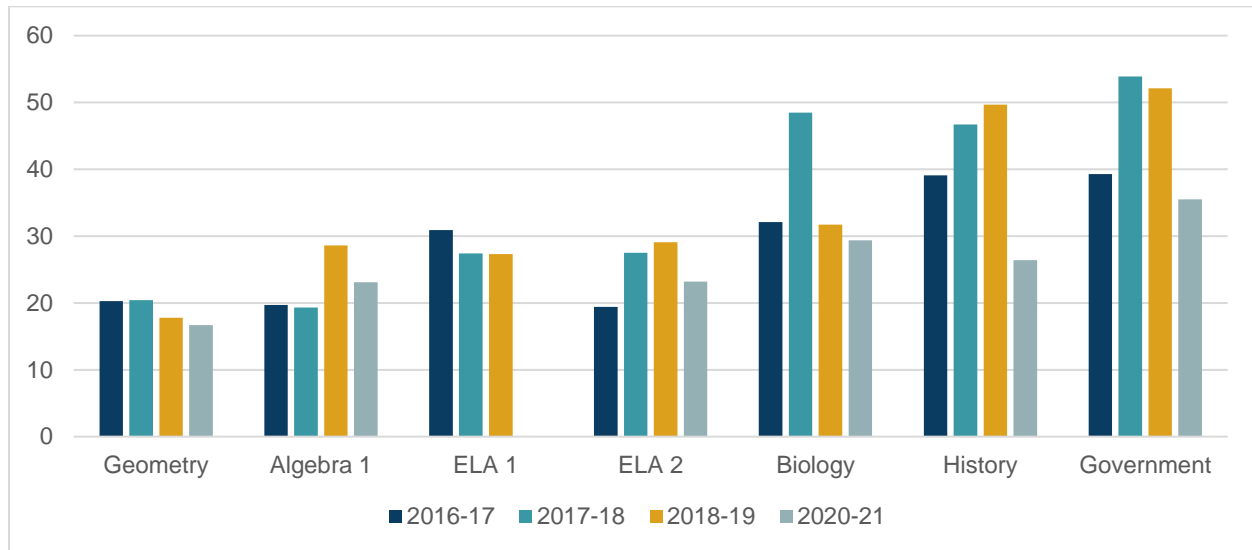
Source: ODE School Report Cards

*OST results for 2019-20 are not reported for any content area due to the COVID-19 pandemic. ELA 1 data were not reported in 2020-21.

WCSD ranks at or near the top of the comparator districts in Geometry and Algebra and near or at the bottom of the comparator districts in all subject areas (Table 5).

Table 5. End of Course (EOC) – Percent of SWD Proficient or Above, 2020-21

District	Geometry	Algebra	ELA	Biology	History	Government
Westerville City	16.7	23.1	23.2	29.4	26.4	35.5
WCSD Rank	1	2	4	5	6	6
South-Western City	<5.0	13.3	21.7	24.8	35.5	36.6
Worthington City	NC	NC	30.4	38.2	45.4	53.8
Lakota Local	16	17	28.6	34.7	48.5	57.5
Pickerington Local	16.1	13.8	45.2	43.4	36.3	38.4
Hilliard City	14.2	32.7	23.2	31.3	49.3	40.2

Source: ODE School Report Card, 2020-21

Graduation Rate

The four-year graduation rate for SWD in WCSD has been consistently below that of their non-disabled peers over the past five years. However, the graduation rate for SWD has steadily increased from the lowest percentage in 2018 (72.6%) to the highest percentage in 2020 (81.9%).

Figure 15. WCSD Four-Year Graduation Rates, 2016 to 2020
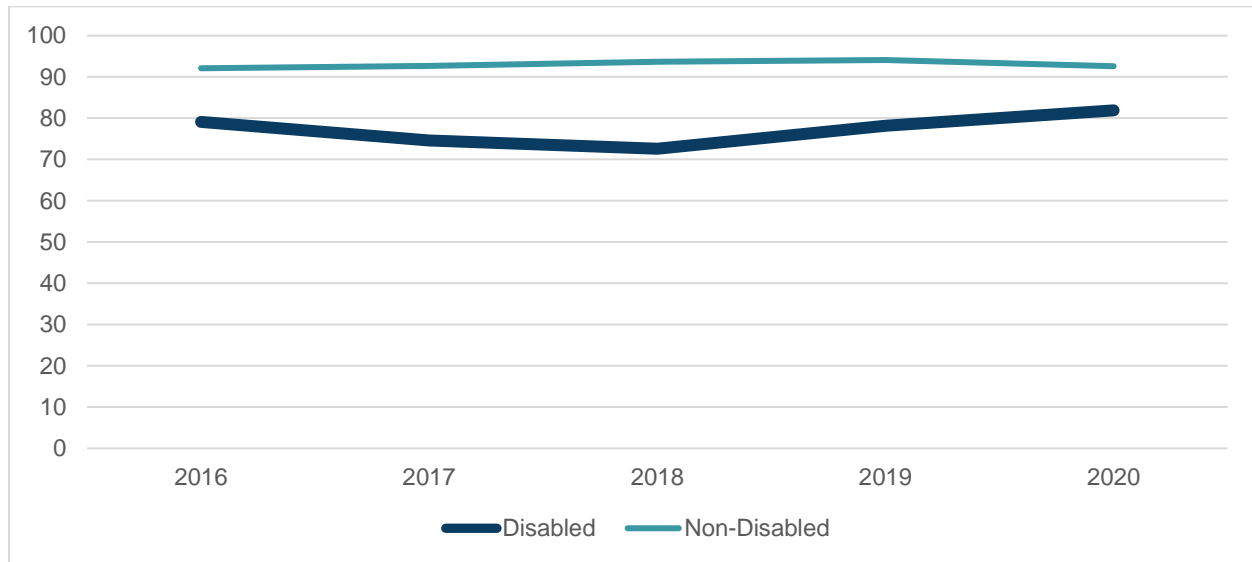
Source: ODE School Report Card, 2020-21

WCSD has the second highest graduation rate for SWD amongst the comparator districts.

Figure 16. SWD Four-Year Graduation Rate, 2020
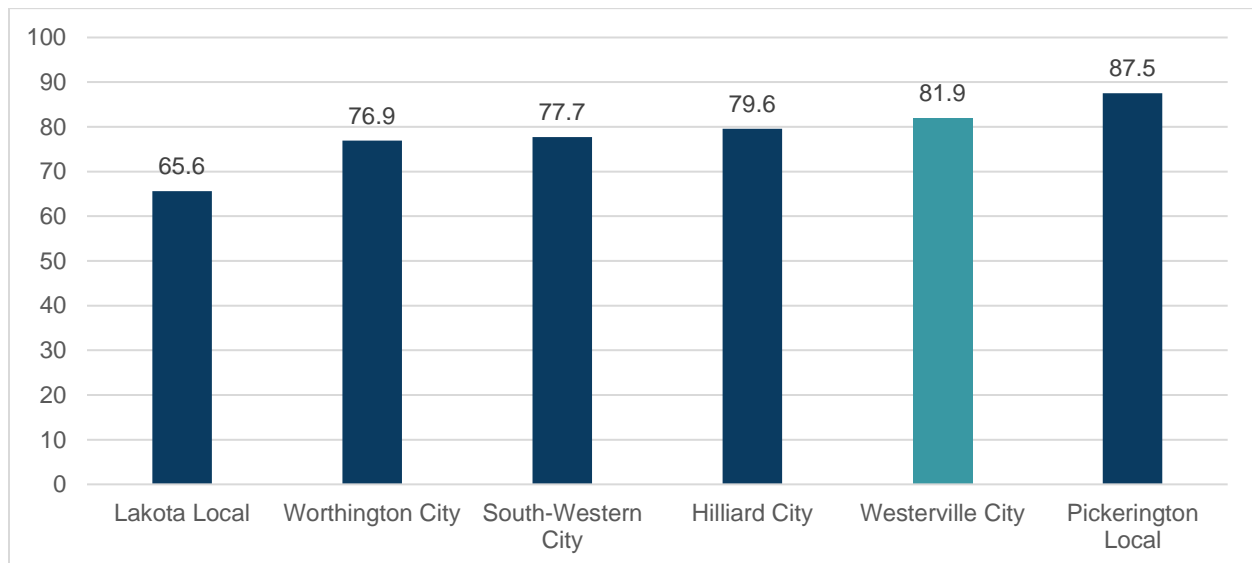
Source: ODE School Report Card, 2020-21

Chapter 3 – Department Organization and Management

This Chapter assesses the management practices of WCSD's Special Education Department and is organized into the following sections:

- Regulatory Environment

- Program Goals and Planning

- Special Education Department Organization

- Program Staffing

- Financial Management

- Program Compliance and Accountability

Regulatory Environment

This section provides an overview of the statutes and regulations at the federal, state, and local levels that dictate how school districts identify and provide services to students with disabilities.

Federal Law

There are three major federal laws that protect the rights of people with disabilities: the Individuals with Disabilities Act (IDEA), Section 504 of the Rehabilitation Act of 1973, and the American Disabilities Act (ADA).

- **The Individuals with Disabilities Education Act (IDEA)** is a law that gives rights and protections to children with disabilities from birth through high school graduation or age 21 (whichever comes first). While all states must comply with the requirements set forth in the IDEA, there are many areas in which IDEA leaves room for states to interpret the rules and pass their own laws on how to apply them. There are six major requirements of IDEA:

  – **Child Find:** Child Find is the term that describes the requirement that school districts take responsibility for identifying and evaluating all children, from birth to 21, suspected of having a disability.

  – **Free and Appropriate Public Education (FAPE)**: All children with disabilities, regardless of the type or severity of the disability, have a right to a free and appropriate public education 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

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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 LRE, districts must provide a continuum of placement and service options.

– **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 (SDI) 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 based on any single test score.

– **Due Process and Procedural 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 the 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.

▪ **Section 504 of the Rehabilitation Act of 1973 (Section 504)** 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 or more major life activities. Major life activities include caring for one's self, walking, seeing, hearing, speaking, breathing, working, performing manual tasks, and learning.

- The **Americans with Disabilities Act of 1990 (ADA)** is a civil rights law that prohibits disability discrimination by schools, employers, and anyone who offers goods and services to the public.

Board Policy and Administrative Guidelines

Following is a brief overview of Board policies ("po" prefix) and administrative guidelines ("ag" prefix) that govern special education and/or Section 504/ADA in WCSD.[6] Additional policies and administrative guidelines relevant to the scope of this review are referenced elsewhere in this report.

- **po2260 - NONDISCRIMINATION AND ACCESS TO EQUAL EDUCATIONAL OPPORTUNITY** prohibits any form of discrimination or harassment on the basis of race, color, national origin, sex (including sexual orientation or gender identity), disability, age (except as authorized by law), religion, military status, ancestry, or genetic information (collectively, "Protected Classes") in its educational programs or activities. (Last revised on May 10, 2021)

- **po2260.01 - SECTION 504/ADA PROHIBITION AGAINST DISCRIMINATION BASED ON DISABILITY** states that policies and practices will not discriminate against employees and students with disabilities and that facilities, programs, and activities are accessible to qualified individuals with disabilities. (Last revised on May 10, 2021)

- **po2460 - SPECIAL EDUCATION** states that the Board adopts the Model Policies and Procedures promulgated by the Ohio Department of Education's Office of Exceptional Children (ODE-OEC), and affirms the Board's obligation to follow the laws and regulations in accordance with the IDEA, the regulations implementing the IDEA, the Operating Standards, the Ohio Revised Code, and the Ohio Administrative Code. (Last revised on August 27, 2018)

- **po2460.03 - INDEPENDENT EDUCATIONAL EVALUATIONS** affirms that parents of a student with a disability have the right to obtain an independent educational evaluation ("IEE") subject to the criteria set forth in this policy. (Adopted on May 9, 2016)

- **po5605 - SUSPENSION/EXPULSION OF STUDENTS WITH DISABILITIES** affirms that the District will abide by State and Federal laws and regulations when disciplining students with disabilities through removal by suspension and/or expulsion and requires the Superintendent to establish administrative guidelines and that they be followed. (Adopted June 1, 2009)

- **ag2260C - MAJOR DIFFERENCES BETWEEN THE IDEA AND SECTION 504** outlines the differences between the requirement under IDEA and Section 504 with regard to qualifying disabilities, FAPE, funding, accessibility, procedural safeguards, and due process. (Adopted on February 1, 2012)

- **ag2260.01A - SECTION 504/ADA - PROHIBITION AGAINST DISCRIMINATION BASED ON DISABILITY, INCLUDING PROCEDURES FOR THE IDENTIFICATION, EVALUATION, AND PLACEMENT OF STUDENTS SUSPECTED OF HAVING A DISABILITY, AND THE RIGHT TO**

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[6] All WCSD policies and administrative guidelines are located on the District's website at
https://go.boarddocs.com/oh/WCSDd/Board.nsf/Public?open&id=policies.

FAPE addresses the identification, evaluation, and educational programming or placement of students with disabilities who qualify under Section 504/ADA. (Last revised October 14, 2019)

- **ag2260.01B - SECTION 504/ADA - PARENTS' PROCEDURAL RIGHTS, INCLUDING DUE PROCESS HEARING** details the procedural safeguards with respect to decisions or actions regarding the identification, evaluation, educational program or placement, or content of a Section 504 Plan of a student who is or may be disabled under Section 504. (Last revised on May 21, 2018)

- **ag2460 - SPECIAL EDUCATION** recognizes the District's obligation to follow all relevant laws and regulations, regardless of whether their provisions are restated in the Model Policies. (Adopted on November 16, 2010)

- **ag2460.03 - INDEPENDENT EDUCATIONAL EVALUATIONS** affirms that parents have the right to obtain an independent educational evaluation at public expense, outlines the examiner's requirements, and lists the prevailing rates for evaluation costs. (Adopted on May 9, 2016)

- **ag2623C - PARTICIPATION OF STUDENTS WITH DISABILITIES IN GENERAL STATE AND DISTRICT-WIDE ASSESSMENTS** requires that students with disabilities be included in general State and District-wide assessment programs with appropriate accommodations and modifications, if necessary, and that alternate assessments be conducted for any student with disabilities who does not take one or more assessments. (Adopted on November 16, 2010)

Program Goals and Planning

A shared vision serves as an anchor for all that a district does to support students academically, socially, and emotionally. A shared vision for special education focuses the work of schools and supports teachers and students to develop shared beliefs and a common language. It also provides stakeholders with a sense of collective responsibility and unity. A common vision and vocabulary regarding services for SWD is an essential pre-condition for achieving positive student outcomes and for effective coordination and use of resources to achieve this result. Conversely, the lack of a shared vision can result in resource misalignments and differences in philosophies and practices guiding service delivery that vary widely from year-to-year and school-to-school.

Finding 1: The District has not established a clear vision for special education that holds teachers and leaders responsible for student outcomes.

Data from multiple sources suggest that the District has not articulated and communicated a shared vision for SWD, nor is it sufficiently fostering a culture of shared ownership and responsibility for SWD. Perhaps the most compelling support for this finding comes from the staff survey conducted as part of this review.

The results of the staff survey revealed that 60.7% of staff that responded to the survey agreed that the District has a clear vision for special education, while 31.1% of staff disagreed. Agreement rates varied by position category (Figure 17), with campus administrators (86.2%) expressing the highest rate of agreement and LSSPs (47.7%) and Instructional Aides (37.2%) expressing the highest rates of disagreement.

Figure 17. Staff Survey: *The District has a clear vision for special education*.
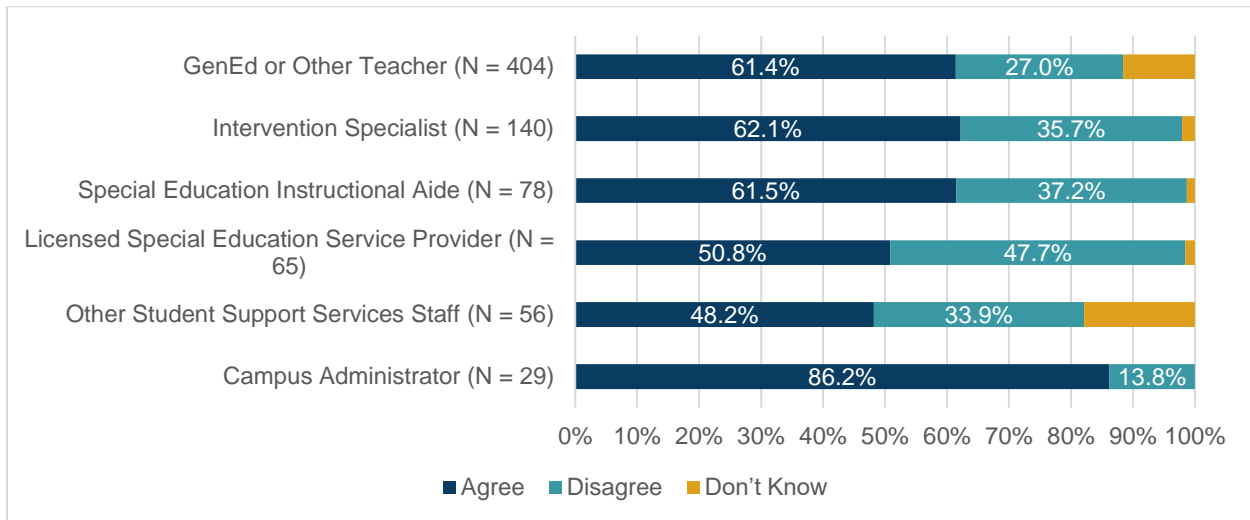
Source: Gibson Staff Survey

When survey data are disaggregated by school level, staff at elementary school expressed the highest rate of agreement (63.7%), while staff at pre-schools (58.3%) and high schools (32.7%) expressed the highest rates of disagreement (Figure 18).

Figure 18. Staff Survey: *The District has a clear vision for special education*.
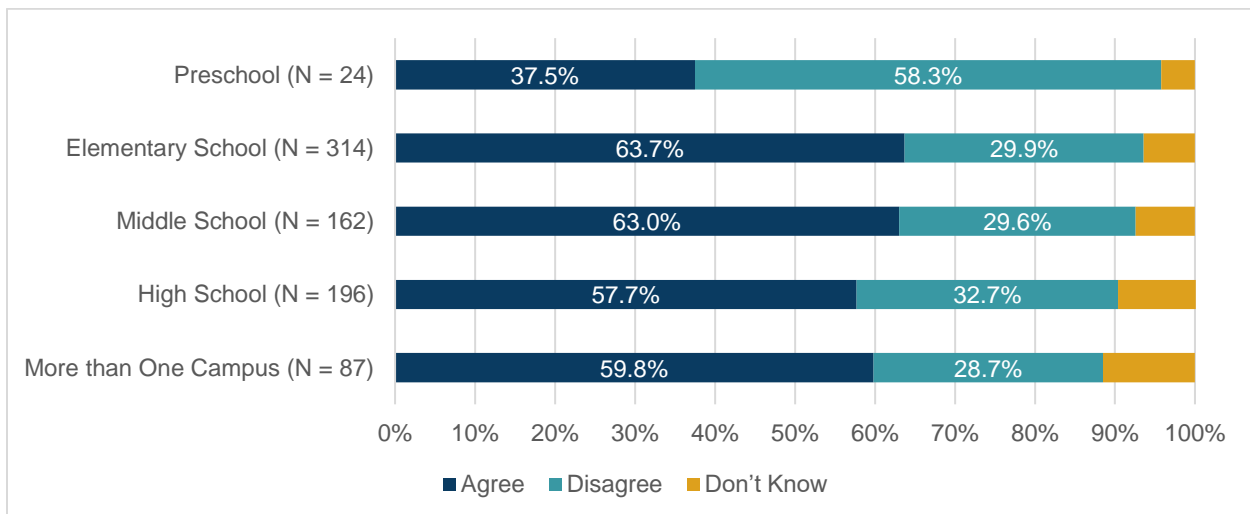
Source: Gibson Staff Survey

Staff was also queried on their perceptions of having a culture of shared ownership and responsibility for SWD at their school. Overall, 76.2% of staff that responded to the survey agreed with this sentiment, while 22.1% of staff did not. Notably, the rate of disagreement for intervention specialists (33.6%) is 17.3 percentage points higher than the rate of disagreement for general education teachers (16.3%).

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Figure 19. Staff Survey: *There is a culture of shared ownership and responsibility for SWD at my school (e.g., educators work on behalf of all students).*
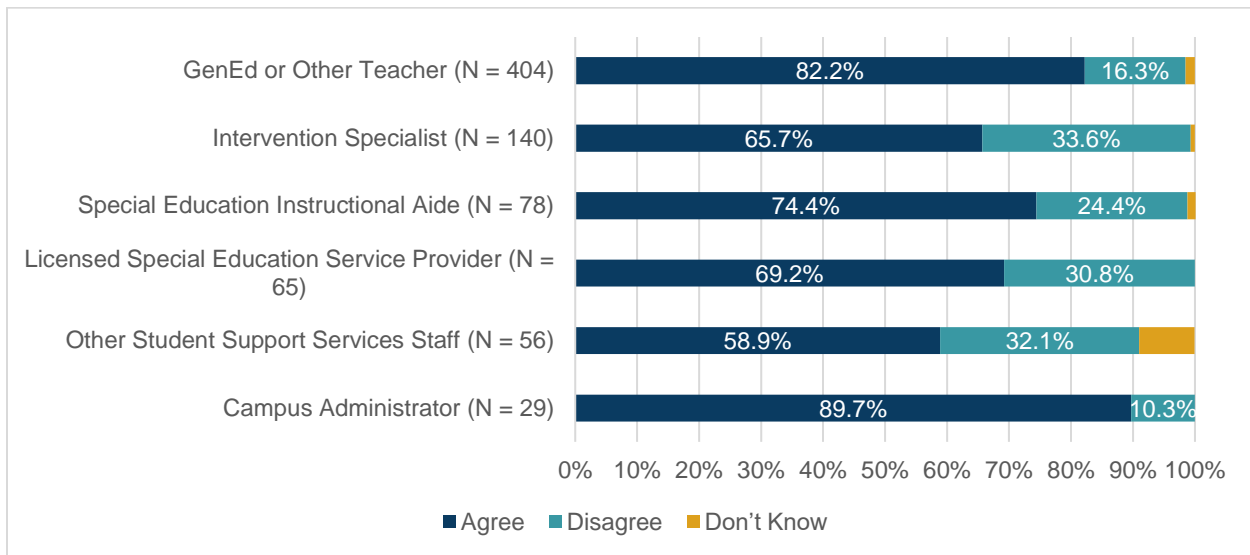
Source: Gibson Staff Survey

By school level, elementary school staff again reported the highest rate of agreement (80.6%), while preschool staff reported the highest rate of disagreement (50%), with 12.5% of preschool staff strongly disagreeing with the statement.

Figure 20. Staff Survey: *There is a culture of shared ownership and responsibility for SWD at my school (e.g., educators work on behalf of all students).*
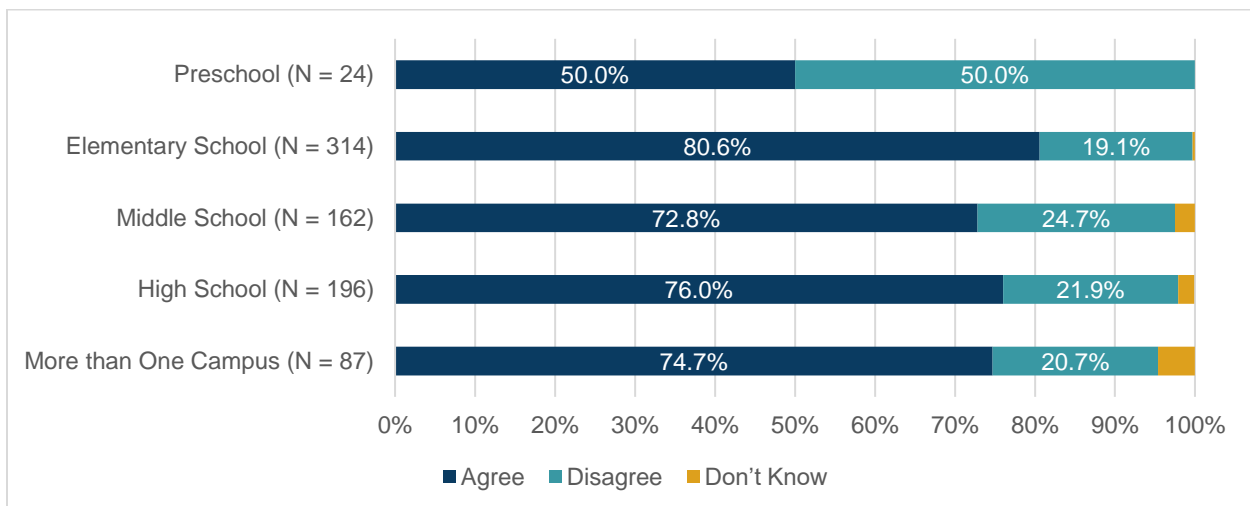
Source: Gibson Staff Survey

When asked about inclusion practices, 67% of staff that responded to the survey agreed that inclusion practices at their school benefit all students, while 27.5% of staff disagreed with this statement. Intervention specialists had the highest rate of disagreement (35%) followed by licensed service providers (34.8%).

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Figure 21. Staff Survey: Inclusion practices at my school benefit all students.
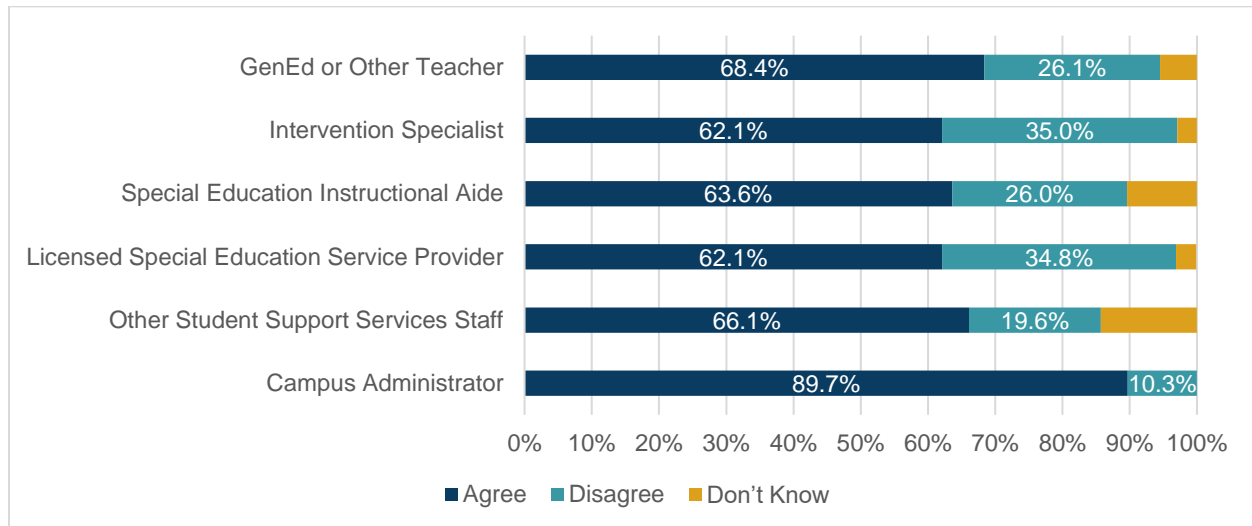
Source: Gibson Staff Survey

At the school level, staff at elementary schools had the highest rate of agreement (70.9%), while preschool staff (48%) and staff at middle schools (31.5%) had the highest rates of disagreement.

Figure 22. Staff Survey: Inclusion practices at my school benefit all students.
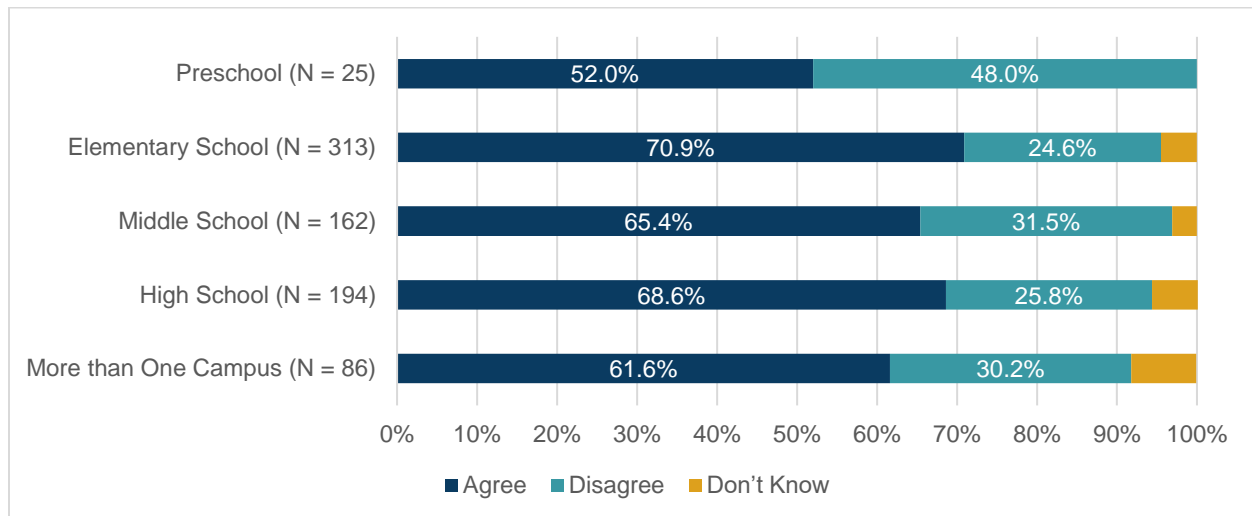
Source: Gibson Staff Survey

Research shows that district and school leaders play a critical role in developing and supporting inclusive schools that improve outcomes for SWD. For example, principals help set a vision for shared goals, are responsible for creating collaborative structures in schools, help set priorities for teacher learning and instruction, and support staff in analyzing student progress.[7] With this in mind, 75.1% of staff agreed that educating SWD is a priority at their school, while 21.6% of staff disagreed with this statement. Notably,

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[7] https://ceedar.education.ufl.edu/wp-content/uploads/2017/12/Principal-Leadership-IC-2017-Revision.pdf

campus administrators (96.6%) and general education teachers (79%) had much higher rates of agreement than the special education service providers (Figure 23).

Figure 23. Staff Survey: Educating SWD to high standards is a priority at my school.
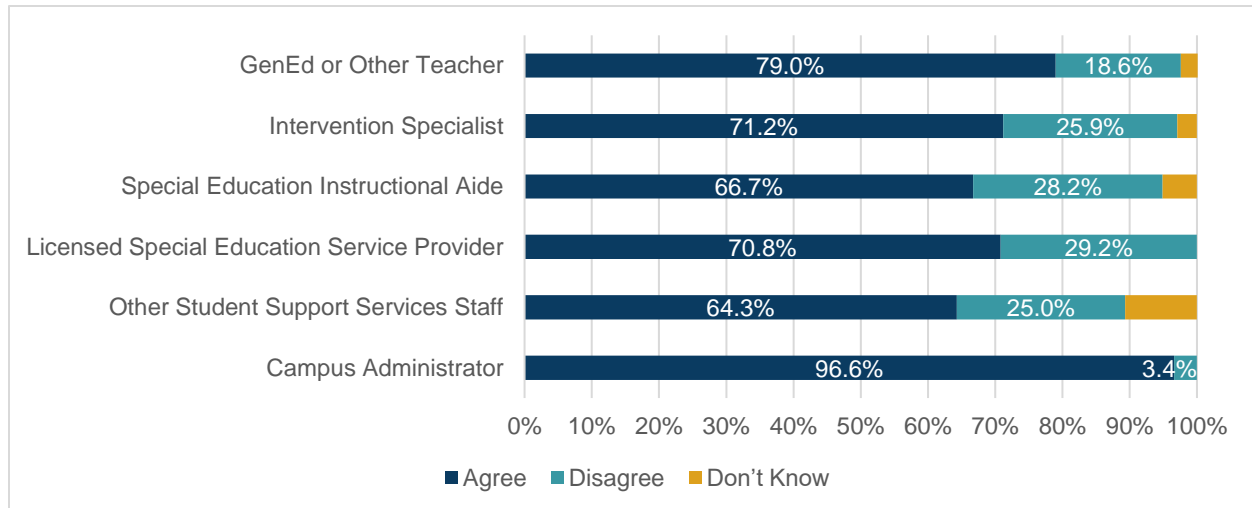
Source: Gibson Staff Survey

By school level, rates of agreement were notably highest at elementary schools (81.5%), and rates of disagreement were again highest at preschool (41.7%), followed by high schools (27%).

Figure 24. Staff Survey: Educating SWD to high standards is a priority at my school.
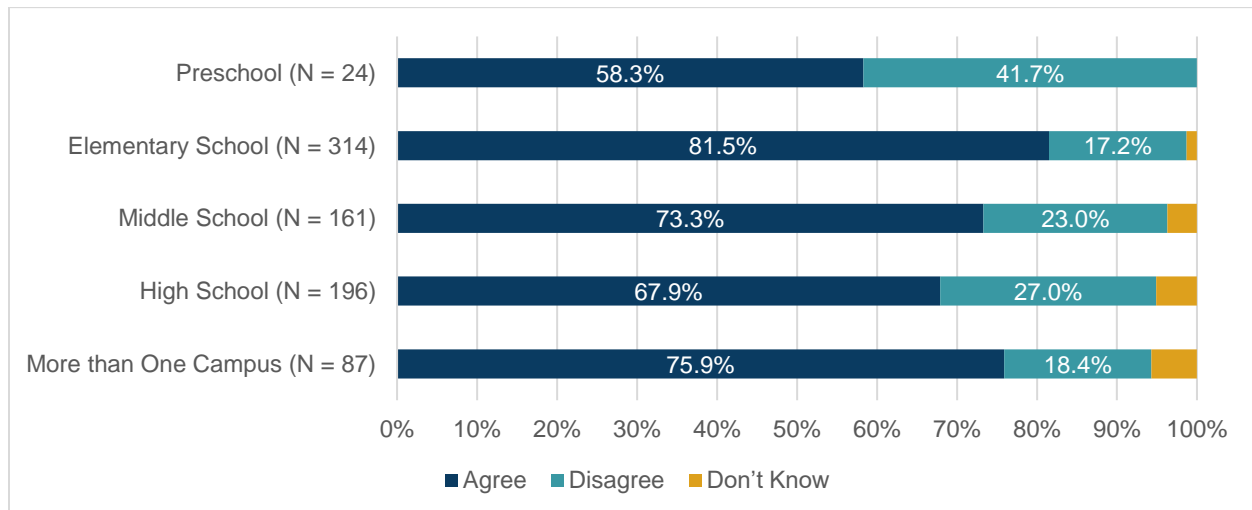
Source: Gibson Staff Survey

The District has not sufficiently articulated a shared vision for students with disabilities. Special Education is not specifically referenced in WCSD's *Performance Objectives and Strategic Priorities* (developed in 2013 and updated in 2017), which includes high-level strategic priorities and performance objectives for the District in the areas of academic performance, social and emotional learning, human capital, learning and work environments, community and parent engagement, and financial resources.

Further, the Special Education Department has not developed its own plan that includes a vision, mission, and goals for SWD, and there is no clear plan to address the compliance indicator exceptions highlighted later in this chapter. As demonstrated in the previous chapter, SWD have made recent gains in graduation rates and proficiency on state assessments. However, the challenges related to increasing enrollment of SWD with greater needs, a persistent achievement gap across subjects and grade levels, overrepresentation of disadvantaged and Limited English proficient (LEP) students in special education, and a historical pattern of serving SWD in more restrictive settings, require a systemic and collaborative approach to addressing them.

Recommendation 1: Develop a multi-year plan for sustained improvement for students with disabilities.

WCSD is commended for initiating this independent and comprehensive review of its special education programs and services, which has the overarching objective of ensuring that all district conditions needed for SWD to succeed are in place. The results of this review should be used to inform the development of a multi-year special education plan, which should articulate the District's shared vision for SWD, Special Education Department goals and objectives, strategies for accomplishing those goals and objectives, and performance indicators to measure success. The plan should be developed through a collaborative effort with District leaders (including the Superintendent, the Assistant Superintendent of Teaching and Learning, the Executive Directors of Elementary and Secondary Schools), the Director of Special Education, and representatives from other stakeholder groups such as principals, general education teachers, intervention specialists, special education service providers, and parents. While separate, this plan should be in alignment with the District's strategic plan.

Special Education Department Organization

The Special Education Department (herein referred to as the Department) is led by a Director of Special Education who reports to the Assistant Superintendent of Teaching and Learning. The Director of Special Education is responsible for directing and managing all aspects of special education programs and services and for ensuring compliance with all statutes and regulations at the federal, state, and local levels that govern the provision of services for SWD. Specific duties include:[8]

- Directing and managing comprehensive programs and related services for students with disabilities.

- Initiating and supervising evaluation of the programs' activities.

- Consulting with elementary and secondary principals on aspects of program implementation and assisting them in interpreting district policies and procedures relating to special education.

- Directing and managing District administrative procedures relating to special education student records content and maintenance; residency, enrollment, and attendance; rights and responsibilities; procedural safeguards; disciplinary actions; and, transfers between buildings.

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[8] Director of Special Education job description.

- Supervising and evaluating Department staff.

- Serving as liaison to the Ohio Department of Education, Office for Exceptional Children, Regional State Support Team, and other special education services groups.

- Preparing necessary reports and project proposals for submission to the Ohio Department of Education.

The Director of Special Education is supported in these responsibilities by seven Coordinators who are collectively responsible for the following duties across the District: [9]

- Assisting District and campus staff with the implementation of research-based practices that will support all students in accessing and progressing in the general curriculum.

- Providing oversight and support to maintain compliance with special education timelines.

- Serving as the district representative for in- and out-of-district IEP/ETR conferences.

- Assisting teachers in designing and implementing classroom management and instructional strategies that enhance and increase student learning and in developing compliant, appropriate, measurable, and collaborative IEP's based on content standards and periodic data collection.

- Providing District and building staff with the consultation and assistance needed to assure continuity between assessment data, the IEP, instruction, and intervention.

- Providing information and explanation to building and district administrators regarding State and Federal laws, recommended practices, District policies and procedures, high expectations for all students, and other topics related to special education essential for the delivery of services to students with disabilities.

- Supporting the participation of SWD in the general education curriculum and general education settings.

- Ensuring compliance with federal, state, and district procedures governing special education eligibility and procedural safeguards.

- Collecting, organizing, and presenting data to support the development of and recommendation for new programs, staffing increases, and equipment and supplies.

- Helping personnel evaluate the effectiveness of special education and related services through data collection and review.

- Coordinating, participating in, and providing professional development for staff.

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[9] Coordinator of Special Education job description.

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▪ Assisting building and district administrators with the completion of observations for staff evaluations.

The organizational chart for the Special Education Department is presented in Figure 25 below.

Figure 25. Special Education Department Organizational Chart, 2021-22
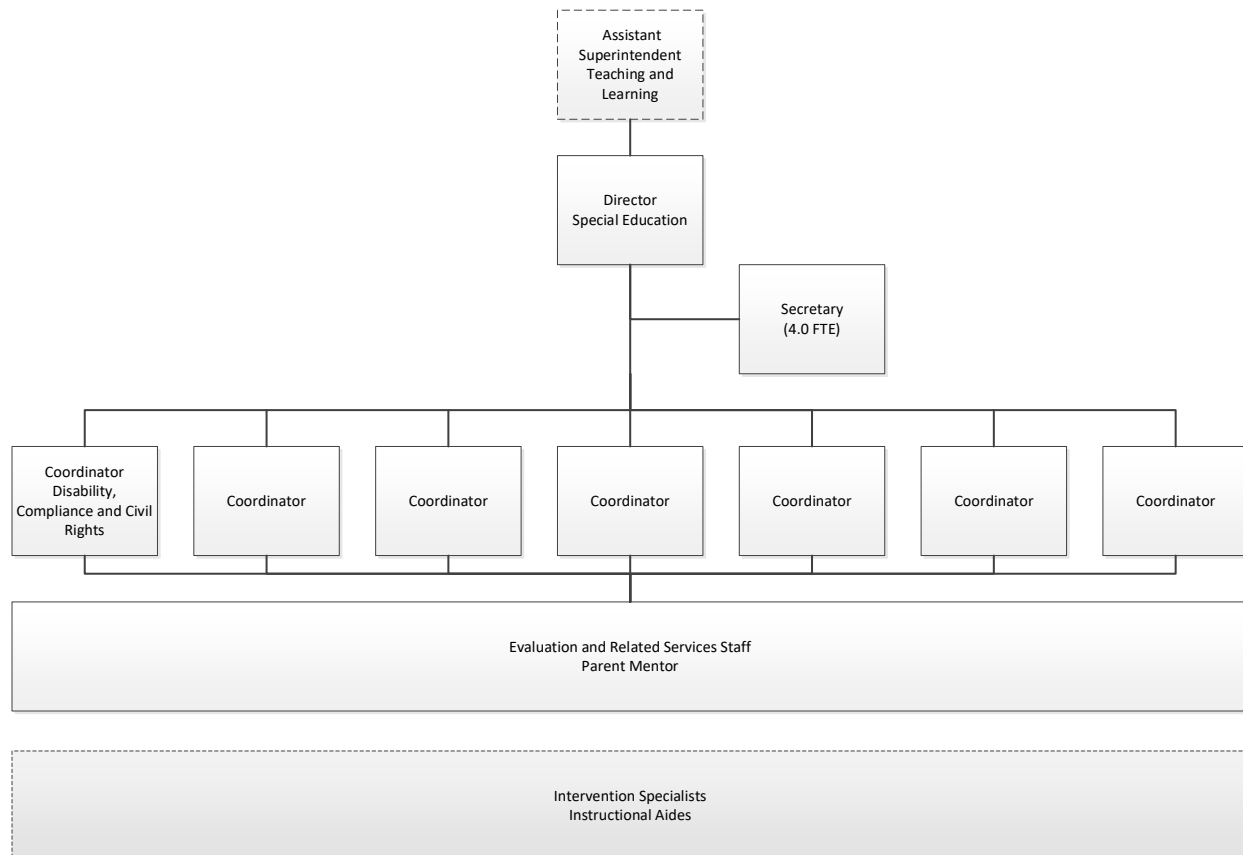
Source: Developed by Gibson Consulting Group based on interviews

Total Department staffing includes approximately 430.3 full-time equivalent (FTE) positions. This includes central office administrators and clerical staff, itinerant evaluation staff and related service providers, and campus-based teachers (i.e., Intervention Specialists) and instructional aides. As shown in Table 6 below, the total number of positions within the Department increased 11.9 FTE (2.8%) over the past four years. Only one position, Adaptive PE (APE)—experienced a net decrease in FTE.

Table 6. Special Education Department FTEs, 2018-19 and 2021-22

Position Type	2018-19	2021-22	Δ
Director	1.0	1.0	0.0
Parent Mentor	0.8	0.8	0.0
Secretary	3.3	4.0	0.7
Coordinator	7.0	7.0	0.0

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Position Type	2018-19	2021-22	Δ
Evaluation Staff and Related Service Providers	62.9	64.6	1.7
- Speech Language Pathologist	23.6	23.6	0.0
- Psychologist	14.3	16.0	1.7
- Occupational Therapist	10.5	10.5	0.0
- Physical Therapist	4.5	4.5	0.0
- Adapted Physical Ed	4.0	3.0	-1.0
- Behavior Specialist	3.0	4.0	1.0
- Transition Services	3.0	3.0	0.0
Intervention Specialist	158.5	163.9	5.4
Instructional Aide	184.9	189.0	4.1
Total FTEs	418.4	430.3	11.9

Source: WCSD position roster (DR #2) and WCSD Student Enrollment Data (DR #33/34 Revised)

Over this same time period, the total number of SWD increased 1.2% (27 students). This has resulted in a 2.8% increase in the total number of SWD per Special Education Department FTE (Table 7).

Table 7. Students with Disabilities per Department FTE, 2018-19 and 2021-22

Position Type	2018-19	2021-22	Δ
Total SWD	2,195	2,222	27
Director	2,195.0	2,222.0	27
Parent Mentor	2,743.8	2,777.5	33.8
Secretary	665.2	555.5	-109.7
Coordinator	313.6	317.4	3.9
Evaluation Staff and Related Service Providers	34.9	34.4	-0.5
- Speech Language Pathologist	93.0	94.2	1.1
- Psychologist	153.5	138.9	-14.6
- Occupational Therapist	209.0	211.6	2.6
- Physical Therapist	487.8	493.8	6.0
- Adapted Physical Ed	548.8	740.7	191.9
- Behavior Specialist	731.7	555.5	-176.2
- Transition Services	731.7	740.7	9.0
Intervention Specialist	13.8	13.6	-0.3
Instructional Aide	11.9	11.8	-0.1

Position Type	2018-19	2021-22	Δ
Student-Staff Ratio	**5.2**	**5.2**	**-0.1**

Source: WCSD position roster (DR #2) and WCSD Student Enrollment Data (DR #33/34 Revised)

Finding 2: Several functions within the Teaching and Learning Department are organizationally misaligned, with consequences that impact Special Education.

In 2021, WCSD's central office was reorganized to reduce the number of direct reports to the Superintendent and to provide more effective oversight over the functions of teaching and learning. The Superintendent's span of control (i.e., the number of direct supervisory reports) decreased from six positions (one Deputy Superintendent and five Executive Directors of Elementary Academic Affairs, Secondary Academic Affairs, Human Resources and Employee Relations, Communications and Technology, and Facilities and Operations) to just one position (the Deputy Superintendent). Under the new organizational structure, two Assistant Superintendent positions were created: an Assistant Superintendent of Teaching and Learning and an Assistant Superintendent of Operations (both of whom report to the Superintendent).

The Assistant Superintendent of Teaching and Learning has nine direct reports: 1) Executive Director of Elementary Schools; 2) Executive Director of Secondary Schools; 3) Director of Special Education; 4) Director of Alternative Education, Assessment, and Discipline; 5) Director of Mental Health and Wellness; 6) Coordinator of Comprehensive Continuous Improvement Plan (CCIP) and Grants; 7) Coordinator of Educational Equity; 8) Coordinator of Gifted Programs and Professional Development; and, 9) Coordinator of English Learner (EL) Programs.

Prior to the reorganization in 2021, the Director of Special Education reported to the Executive Director of Elementary Academic Affairs. This realignment of Special Education under the Assistant Superintendent of Teaching and Learning is appropriate, as special education provides programs and services to students in Pre-kindergarten through Grade 12. However, the Director of Preschool (who oversees preschool programs for SWD) currently reports to the Executive Director for Elementary Academic Affairs. This is problematic for three reasons:

- More than two-thirds (67.5%) of the students enrolled in the District's preschool program at the Early Learning Center (ELC) are SWD.

- Three of the State Performance Plan (SPP) indicators missed by WCSD are related to whether or not children with disabilities are entering Kindergarten ready to learn.

- The Special Education program budget far exceeds that of the Preschool program budget, yet a director-level position oversees both of these programs.

In addition, two other important functions within the Teaching and Learning Department appear to be organizationally misaligned:

- Oversight of the Section 504 program is diffused across several departments within Teaching and Learning. At the school level, counselors are responsible for the case management of students with disabilities who receive services under Section 504 (this topic is discussed further in *Chapter 4 –*

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Student Identification, Evaluation, and Placement), and oversight of the school counseling program resides with the Director of Mental Health and Wellness. However, one of the Coordinators within the Special Education Department is named as the District's Section 504 Compliance Officer. In this capacity, this position is responsible for ensuring compliance with all procedures and procedural safeguards required under Section 504 and providing training to ensure that all staff understand their responsibilities under Section 504. Feedback from stakeholders suggests a lack of consensus and confusion as to which department is responsible for Section 504, partly because responsibility for this function has shifted several times over the past few years.

▪ Responsibility for professional development resides with the Coordinator for Gifted and Talented and Professional Development. Although the topic of professional learning is discussed in greater detail in *Chapter 5 – Program Design and Implementation*, the District lacks a coherent professional learning system that aligns resources and guides the professional learning for all administrators, teachers, and instructional support staff. Combining these two responsibilities—gifted and talented and professional learning—into a single position appears to be due to the skills and capacity of the individual filling the position rather than the logical alignment of these two functions.

Recommendation 2: Reorganize the Department of Teaching and Learning to reduce the span of control of the Assistant Superintendent and provide better oversight and accountability for specialized learning programs.

To address the organizational misalignments and to improve accountability and oversight of key functions within the Department of Teaching and Learning, it is recommended that WCSD create a new Executive Director of Specialized Learning position that would oversee Special Education, Section 504, Gifted and Talented, and EL programs. Additionally, it is recommended that that preschool program be realigned under the Director of Special Education and that the Preschool Director position be reclassified the to a Coordinator position to better reflect the roles and responsibilities of the position. This position leveling is consistent with positions that oversee the Gifted and Talented and English Learner programs.

Figure 26 below illustrates the recommended organizational structure for the Teaching and Learning Department.

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Figure 26. Teaching and Learning Department Recommended Organizational Structure
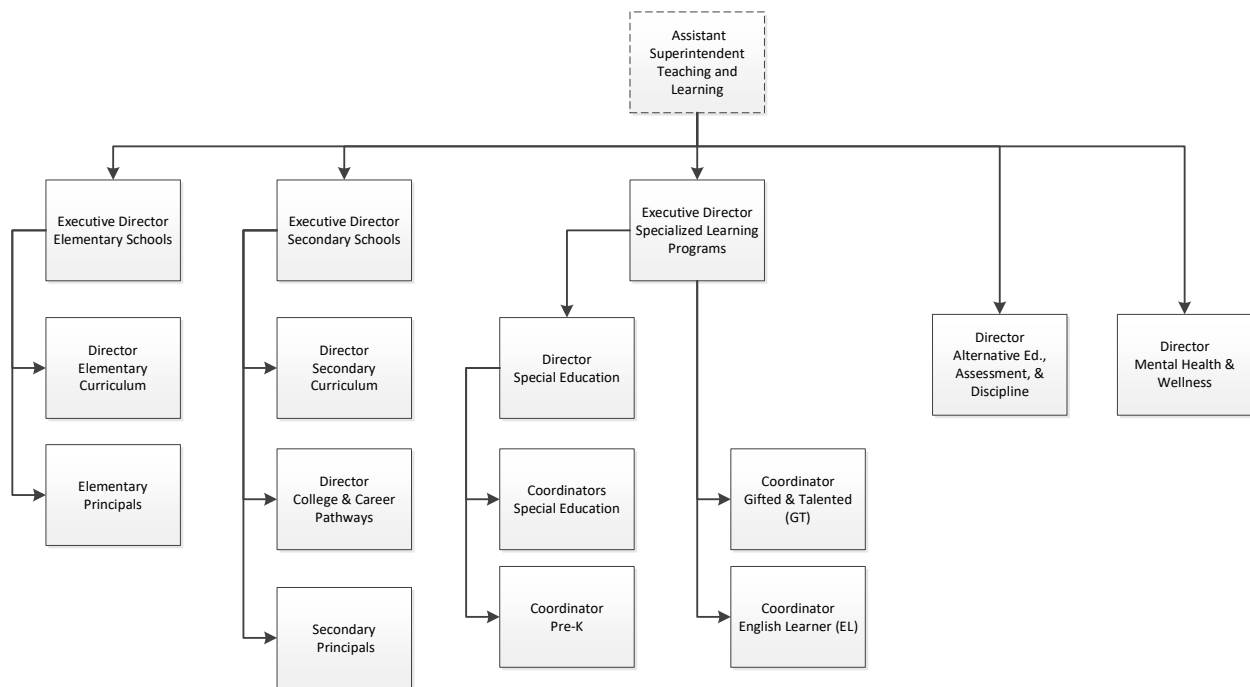
Finding 3: Special Education Coordinator responsibilities are not assigned in a manner that maximizes staff efficiency.

A central office that is organized efficiently and effectively plays an essential role in supporting improvement at the school level. As such, the review team assessed the Special Education Department's organizational structure with respect to:

- The strategic alignment of the Department within the District's overall organizational structure;

- The sufficiency and efficiency of central-office staffing levels given the nature of the work to be performed and/or current workloads;

- The logical alignment of organizational units and/or functions within the Special Education Department;

- The reasonableness of spans of control (i.e., the number of individuals reporting to a supervisor) given the nature and complexity of the work being overseen;

- Whether or not job descriptions are current and reflect the appropriate requirements, duties and responsibilities to meet the objectives of the Department; and,

- The degree to which stakeholders are satisfied with the accessibility and responsiveness provided by central office administrators and staff.

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To provide additional context for the assessment of the sufficiency of the Department's staffing levels, the review team collected publicly available staffing data from the websites of the five comparator districts. Benchmark data should be considered with some caution because 1) the scope of responsibilities for positions in other districts is undeterminable, and 2) it is possible that not all positions are listed on district websites. One district (South-Western City) does not identify any special education staff on its website. Nevertheless, key observations from this benchmarking assessment find that of the four other comparator districts:

- Three districts participate in the State's Parent Mentor program (as does WCSD).

- Three districts have a director-level position leading their special education department (as does WCSD), and two of the districts (Lakota Local and Pickerington Local) have an executive director-level position leading their department. While the latter two districts have fewer SWD than WCSD, their department's titles of "Special Services" and "Student Services", respectively, may indicate that other programs in addition to special education are organized within the department.

- WCSD has more administrator (i.e., coordinator) positions than all of the comparator districts. Hilliard City, which has more SWD than WCSD, is closest in staffing with six coordinator positions plus an assistant director position. Pickerington Local has seven coordinator positions, one of which is a preschool coordinator (a function that is currently resides outside of WCSD's Special Education Department).

- WCSD has a higher number of clerical support staff (i.e., secretaries) than the two other districts that include administrative support staff on their website. Secretarial staff in WCSD are responsible for providing administrative support to the Director and the coordinators, including but not limited to querying *IEP Anywhere* and generating needed reports; maintaining Excel spreadsheets of student enrollment and exit data; data entry; working with the District EMIS coordinator reporting Child Count data; answering phones; ensuring that record retention and destruction procedures are implemented; and, entering purchase orders and processing invoices.

Table 8 below provides a summary of the positions in each district's special education department.

Table 8. Comparator Districts Special Education Department Central Office Positions, 2022

District	Total SWD*	Central Office Positions	Clerical Positions
Westerville City	1,989**	1 Director of Special Education 7 Coordinators 1 Parent Mentor	5 Secretaries
South-Western City	3,691	Not publicly available	Not publicly available
Worthington City	1,570	1 Director of Special Education 3 Special Education Coordinators 1 Parent Mentor 1 Job Training Consultant	2 Administrative Assistants
Lakota Local	1,630	1 Special Services Executive Director	Not publicly available

District	Total SWD*	Central Office Positions	Clerical Positions
		4 Special Education Supervisors 1 Parent Mentor	
Pickerington Local	1,422	1 Executive Director of Student Services 1 Preschool Coordinator 1 Work Study Coordinator 5 Special Education Coordinators	3 Administrative Secretaries
Hilliard City	2,349	1 Director of Special Education 1 Assistant Director 1 Parent Mentor 6 Coordinators	Not publicly available

Source: District websites

*ODE October Headcount FY22

** Figures available from ODE will differ somewhat from the student-level data provided by WCSD. For this reason, ODE data is used when comparing WCSD to other districts.

One of the most critical functions of the central office is to support school-based staff in the delivery of high-quality instruction and related services. In addition to staffing levels, the review team also examined the roles and responsibilities of the program coordinators. The Director's span of control includes seven coordinators, each of whom has been assigned to support a group of schools and additional administrative responsibilities. Figure 27 below shows the distribution of responsibilities assigned to each of the seven coordinators.

Figure 27. Assigned Responsibilities of Department Coordinators, 2021-22

WCS SCHOOLS						
Annehurst	Huber Ridge	Mark Twain	Emerson/LF	Hawthorne	Cherrington	Alcott
McVay	Wilder	Robert Frost	Fouse	Pointview	Whittier	Hanby
Walnut Springs HS	Blendon MS	Genoa HS	South HS	North HS	Heritage HS	Central HS
OOD SCHOOLS						
Phoenix Central		St. Paul	CCCA	Reach	Eastwood Academy	Oakstone
Northside			Ventures	Ability Matters	Christian Life	Haugland
			FCBDD	OSSB/OSD	ATCW	
				Colerain/Chip	Boundless	
RESPONSIBILITIES						
Transportation	Secondary Principals	Scholarship	Civil Rights	Elementary Principals	IEP Anywhere	Psychologists/ Erin Bopp
Home Instruction	Curriculum & Instruction	Motor Team	504	SLP	Assistive Technology	Facilitators
Motor Team	Caseload/ Transition	Caseload/ Transition	Policy	Medicaid	Curriculum Council K-12	AA
AA	Scholarship	Medicaid	Transition Team	Hearing Impaired	K. Drummond & L. Hoskins	BOBW
Instructional Aides	Behavior Specialists		Parent Mentor	Instructional Coaches	Curriculum & Instruction	Transportation
SPED GROUPS						
LD 6-8	ED	AU	LD K-5	LD 9-12	ID	MD

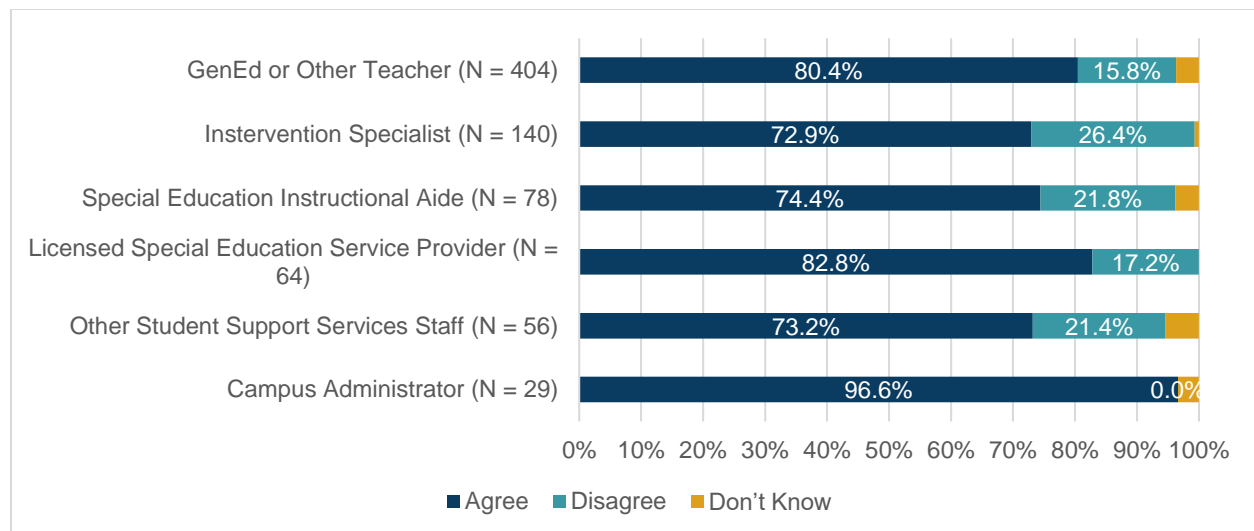Source: WCSD Special Education Department (DR #1)

As shown in the table above, many of the administrative responsibilities are shared by two coordinators (e.g., Alternate Assessments, Scholarship, Transportation, Motor Team, Medicaid). This can be problematic because having two or more positions jointly responsible for a function diffuses accountability

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within the Department. In addition, administrative responsibilities are often rotated amongst the coordinators each year. This can also be problematic because it may not always be clear to stakeholders outside of the Department who to contact regarding a specific function; some of the anecdotal feedback provided to the review team supports this assertion. However, this approach to assigning coordinator responsibilities is intentional by the Director to ensure that staff are cross-trained in all functional areas, and coordinators were mostly positive in their feedback regarding their assigned responsibilities and perceptions of balanced workloads.

In addition to the responsibilities listed above, coordinators are responsible for evaluating all of the non-OTES (Ohio Teacher Evaluation System) positions within the Department. This includes all of the evaluation staff and related service providers (e.g., SLPs, School Psychologists, Therapists). Each coordinator is assigned a mix of approximately eight non-OTES staff to evaluate, plus any additional positions for the administrative functions they are assigned. In some cases, non-OTES staff experience different supervisors year-over-year when coordinator assignments change. This approach to evaluating non-OTES positions may be problematic as there is a wide perception amongst non-OTES staff that there are inconsistencies in how coordinators conduct their performance evaluations. School psychologists expressed a concern that they are not being evaluated by another licensed school psychologist and that having different supervisors may contribute to their perceptions of high and unbalanced workloads (discussed further in Finding 5).

Overall, a high percentage of school-based administrators and staff agree that the Department's central office staff (i.e., Director and coordinators) are both accessible and responsive, but rates of agreement varied by employee group. Nearly 76% of staff that responded to the survey agreed that Department staff are accessible; campus administrators had the highest rate of agreement (96.6%), while intervention specialists had the highest rate of disagreement (26.4%).

Figure 28. Staff Survey: *Special Education Department staff are accessible.*

Source: Gibson Staff Survey

A lower percentage of staff (68.5%) that responded to the survey agreed that Special Education Department staff are responsive to their needs. Again, campus administrators had the highest rate of agreement (96.6%), while Special Education instructional aides had the highest rate of disagreement (28.2%).

Figure 29. Staff Survey: *Special Education Department staff (e.g., Director, Coordinators) are responsive to my needs.*
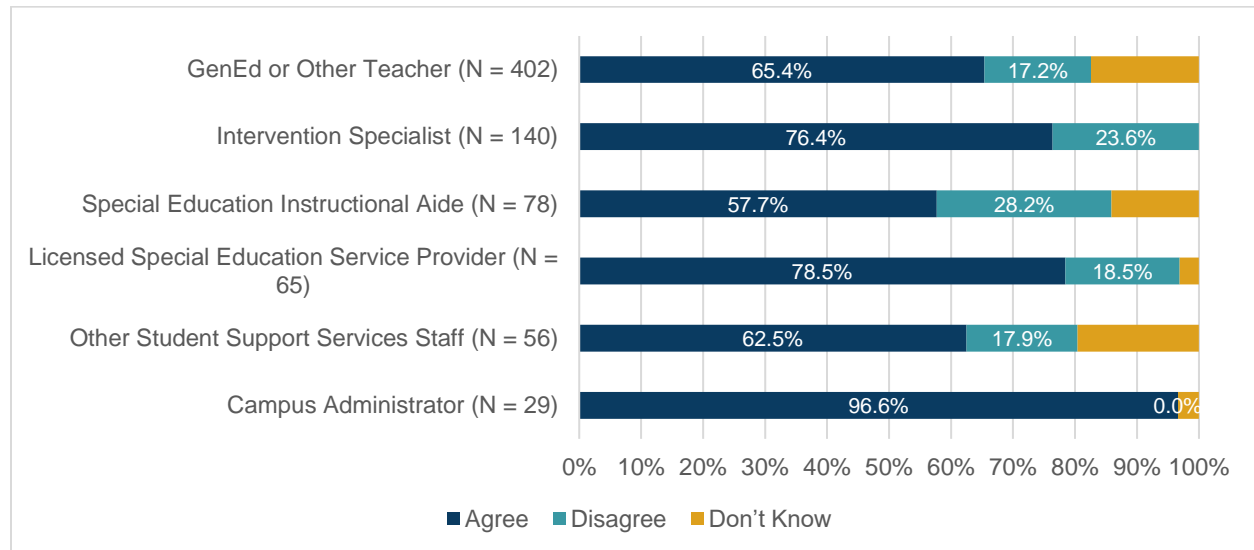
Source: Gibson Staff Survey

Anecdotal feedback provided during group interviews with campus administrators, intervention specialists, and paraprofessionals suggests that much of the work of the coordinators is centered around ensuring compliance with regard to ETR/IEP meetings both at WCSD and OOD campuses and to a much lesser extent on activities that support instruction for SWD (e.g., coaching, modeling). This context may contribute to some of the higher rates of disagreement by some employee groups.

Recommendation 3: Restructure the Special Education Coordinator's responsibilities to increase program accountability and improve instructional supports.

Downward trends in student-staff ratios, as well as staffing comparisons to other districts, suggest that WCSD may have a higher number of coordinator positions than currently needed. However, because the number of campuses is planned to increase over the next few years (adding an elementary and middle school), it is probable that the number of SWD along with the number of instructional and instructional support staff will increase. Rather than reducing the number of coordinator positions within the Department at this time, it is recommended that their roles and responsibilities be restructured to provide more instructional support to campuses. Specifically, the Department should:

- Transition responsibilities for attending initial ETR and IEP meetings to campus administrators, who can serve as the district representative in these meetings. Coordinators can and should continue to attend any initial ETR and/or IEP meetings that may be considered complex or otherwise challenging for various reasons. This will help to improve program accountability at the school level.

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- Develop a departmental organizational chart and publish it on the District's website to more clearly communicate position responsibilities for all staff within the Department.

- Evaluate the functions of the administrative support staff (i.e., secretaries) to determine whether or not any responsibilities can be streamlined through reduced paperwork, more efficient processes, or better use of information systems.

Program Staffing

Finding 4: Several job descriptions for Special Education Department positions are not current.

Board Policy PO3120.01 – Job Descriptions recognizes that it is essential for District and employee accountability for each staff member to be fully aware of the duties and responsibilities of her/her position. Job descriptions document and describe the essential roles and responsibilities for professional and classified staff positions and thereby promote organizational effectiveness and efficiency. This policy states that, among other things, job descriptions should be brief, factual, and whenever possible, generically descriptive of similar jobs. It also states that employees will be evaluated, at least in part, against their job descriptions.[10]

Gibson reviewed 20 job descriptions of positions that are within the scope of this review and found that many of them have not been updated in more than six years. As a result, many of the supervisory titles are incorrect. This can create confusion around reporting and accountability structures within the Department. Below are some examples:

- The job description for the Assistant Superintendent of Teaching and Learning incorrectly lists only a subset of positions currently under the supervision of the Assistant Superintendent. It also incorrectly states that this position supervises a Director of Professional Development/Gifted Programs and a Director of Educational Equity, both of which are currently coordinator-level positions.

- The Director of Special Education job description (last updated in 2016) lists the supervisor as the Executive Director of Elementary Academic Affairs. This position currently reports to the Assistant Superintendent of Teaching and Learning.

- Job descriptions for the Speech Language Pathologist, School Psychologist, Mental Health Specialist, Physical Therapist, and Occupational Therapist lists the supervisor as the Director of Special Education. In practice, these positions report to one of the program coordinators responsible for conducting the performance evaluation of all non-OTES staff.

- The Parent Mentor job description lists the supervisor as the Executive Director of Special Education. Anecdotal feedback provided during interviews suggests that this position reports to both the Director of Special Education and one of the program coordinators.

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[10] This policy was adopted September 14, 2009.

- Job descriptions do not exist for the Transition Specialist or American Sign Language (ASL) teacher position.

- There is only one job description for the Intervention Specialist position despite significant differences in the responsibilities of Intervention Specialists in inclusion and/or resource settings or in a specialized learning classroom (SLC).

Recommendation 4: Review and update job descriptions to ensure they accurately reflect assigned roles, responsibilities, reporting relationships, and position qualifications.

Updated job descriptions are essential for ensuring supervisors and staff understand the essential knowledge, skills, abilities, responsibilities, and reporting relationships for their position. In collaboration with the Human Resources Department, the Special Education Department should establish a plan to review and revise job descriptions every three years or as needed when job responsibilities or working conditions change. Job descriptions will also need to be updated and/or created to reflect any changes in position responsibilities and reporting structures.

***Finding 5: The Department's** staffing protocol is based upon ODE caseload maximums, not on workloads as required by the State's Administrative Code. .*

"Caseload" is defined as the number of children who receive specially designed instruction or direct related service from a service provider. "Workload" is defined as all services and duties assigned to service providers. This consists of direct and indirect (including but not limited to meetings, paperwork, and professional development) service to children with and without disabilities.

Administrative Code *3301-51-09 Delivery of Services Section (I) Service provider workload determination for delivery of service* requires that all school districts and other educational agencies determine the workload for an individual service provider based upon the following three factors. First, workload for an individual service provider must be determined by following a process, which must incorporate all areas of service provided to students with and without disabilities (e.g., staff meetings, professional development, travel); the severity of each eligible child's need and the level and frequency of services necessary to provide FAPE; and, the time needed for individual and collaborative planning. Second, school-age service providers (i.e., Intervention Specialists) will provide specially designed instruction in accordance with requirements that limit the number of students per licensed professional. Third, related service providers for preschool and school-age children with disabilities will provide specially designed instruction in accordance with requirements limiting the number of students per licensed professional.

The *Ohio Operating Standards for the Education of Children with Disabilities* requires districts to use a workload process to determine a service provider's caseload. Once the district determines the workload, it must decide if the workload can be completed as it is assigned. If not, the district must make changes. In addition, districts and service providers should evaluate workloads at different points during the school year. Although the Office for Exceptional Children does not prescribe which workload process should be utilized,

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it provides a calculator to help local school districts make decisions about workload for service providers working full time.[11]

The Special Education Department Director currently utilizes the caseload maximums established by the ODE—which limits the number of students per licensed professional—to determine school allocations for intervention specialists and related service provider positions. Although some allowances are made for campus enrollment, the number of new referrals, or the number of specialized learning classrooms on campus, individual staff workloads are not routinely calculated for licensed service providers, as required by *Administrative Code 3301-51-09 Delivery of Services.* This is problematic because the Department does not have a defensible method for ensuring that staffing levels are commensurate with student needs.

When asked about the sufficiency of District resources for SWD, most of the feedback provided by staff during group interviews or on the staff survey was unfavorable. For example, more than half (50.5%) of all staff that responded to the survey do not feel that their daily workload is manageable within the school day. Licensed service providers had the highest rate of disagreement (64.6%), followed by intervention specialists (61.4%). As stated in *Chapter 1 – Introduction*, the review team recommends that the District explore areas where disagreement rates exceed 20%, and consider addressing with more urgency any areas where disagreement rates exceed 30%.

Figure 30. Staff Survey: My daily workload is manageable within the school day.
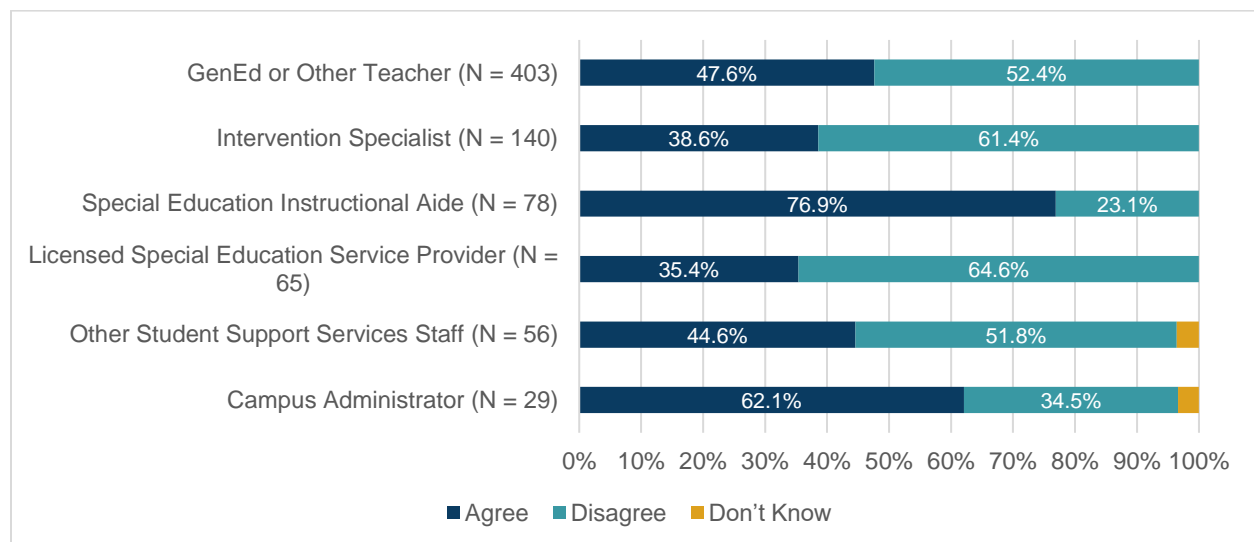
Source: Gibson Staff Survey

Just 29.2% of staff that responded to the survey agreed that sufficient staff is available to meet the needs of staff at their school, while 67.5% of staff did not agree. Disagreement rates were highest for staff at the ELC (91.7%), followed by staff at middle schools (74.7%) (Figure 31).

Figure 31. Staff Survey: *There is sufficient staff available to meet the needs of SWD at my school.*
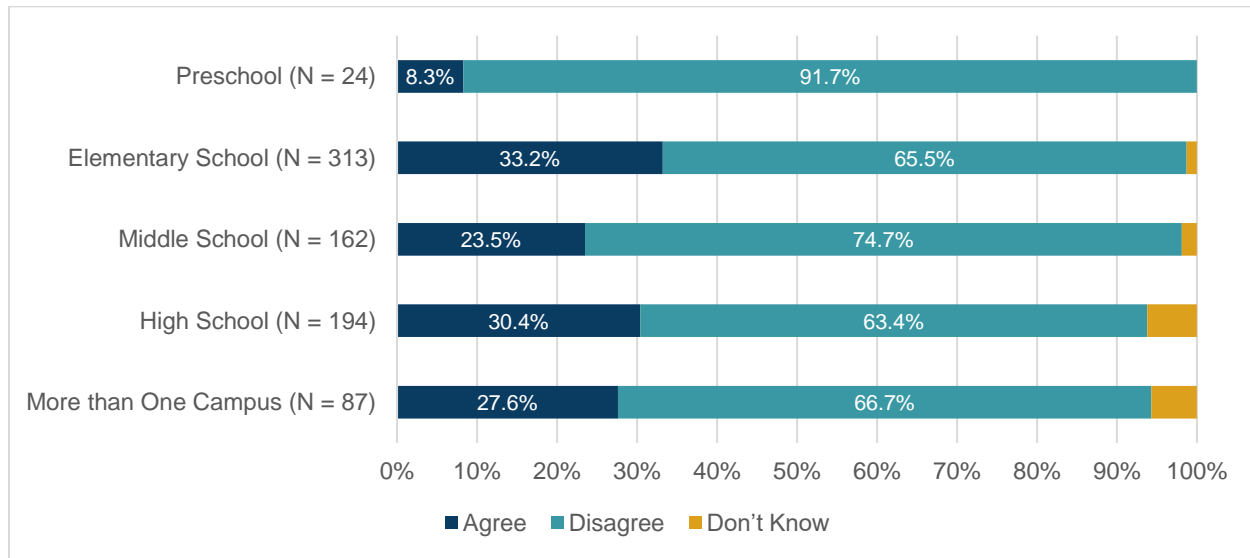
Source: Gibson Staff Survey

Further, less than half (47.2%) of all staff that responded to the survey agreed that the District provides adequate resources to meet the needs of SWD, and one-third (33.5%) agreed that resources are allocated equitably across campuses (Figure 32).

Figure 32. Staff Survey: Allocation of Resources (All Staff)
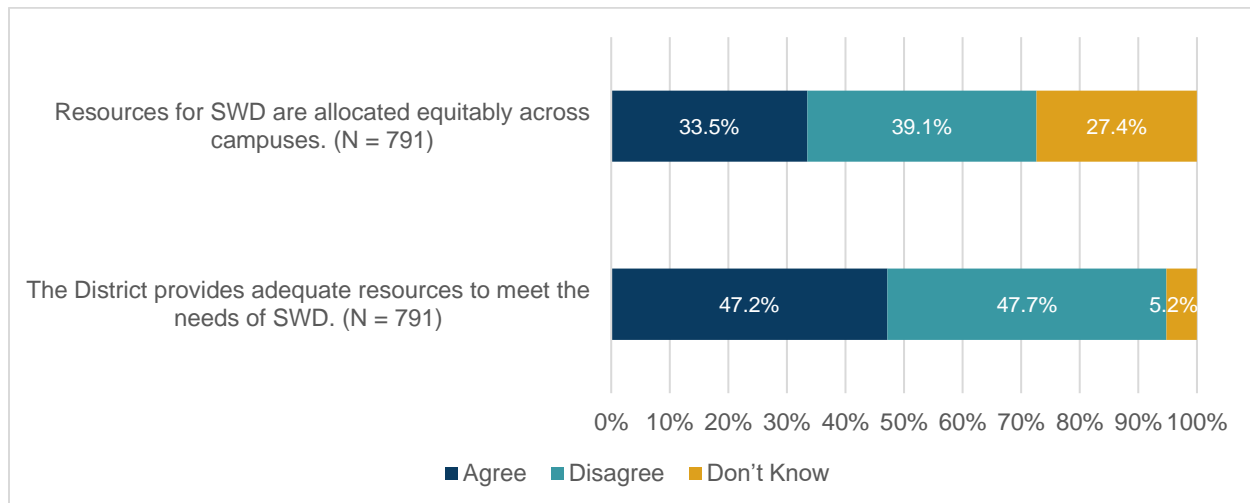
Source: Gibson Staff Survey

Other benchmarks and indicators suggest that WCSD may not be optimally staffed for some positions. The Ohio Department of Education provides comparative staffing data for all Ohio school districts. Table 9 below compares the number of educators per 1,000 students for each of the comparator school districts and the State average for select positions relevant to this review's scope. It is presented here to provide additional context for WCSD. Compared to the State average, WCSD has fewer general education teachers, special education teachers, psychologists, and APE teachers per 1,000 students than the State average, and more

OT/PTs per 1,000 students than the State average. The number of SLPs per 1,000 students is equal to the State average.

Table 9. Educators per 1,000 Students, 2021-22

Position	WCSD	South-Western City	Worthington City	Lakota Local	Pickerington Local	Hilliard City	State Avg.
Gen Ed Teachers	44.5	43.3	46.1	38.8	41.5	52.8	47.3
Sped Teachers	11.6	16.6	11.4	8.6	11.6	9.1	13.7
Teacher Aides	0*	14.4	13.9	14.8	8.9	12.6	14.3
SLPs	1.6	1.5	1.3	1.8	1.2	1.2	1.6
Psychologists	1.1	1.0	1.2	1.0	0.6	1.0	1.2
OT/PT	1.1	1.4	1.0	0.8	0.2	0.9	0.9
APE	0.3	0.3	0.1	0	0	0.3	0.1

Source: Ohio Department of Education, School Report Cards

*The number of teacher aides is not reported for WCSD.

In addition to the student-staff ratios (Table 9 above), the review team also analyzed trends in the number of Intervention Specialists relative to the number of Instructional Aides (Table 10). WCSD currently has an overall Intervention Specialist-to-Instructional Aide ratio of 0.87, indicating that there are 13% more instructional aides than intervention specialists. This ratio has decreased over the past five years, indicating that the number of aides supporting SWD has increase relative to the number of certificated teachers. Although this is not an uncommon practice in many school districts, as instructional aides typically cost about one-half that of a certified teacher, much of the research suggests that instructional aides have little, if any, positive impact on improving outcomes for SWD.[12] In fact, there are significant concerns, based on research, that the current use of instructional aides can decrease a student's access to certified teachers as well as the student's level of engagement in the classroom. Using an instructional aide also can decrease the general education teacher's level of engagement with the student when in the general education classroom.[13]

Table 10. Intervention Specialist-to-Instructional Aide Staffing Ratio, 2018-19 to 2021-22

Position	2017-18	2018-19	2019-20	2020-21	2021-22
Intervention Specialist	154.5	158.5	160.5	163.5	163.9
Instructional Aide	169.0	184.9	187.9	180.6	189.0
Intervention Specialist-Aide Ratio	**0.91**	**0.86**	**0.85**	**0.91**	**0.87**

Source: WCSD position roster (DR #2)

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[12] http://journals.sagepub.com/doi/abs/10.3102/01623737023002123.

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

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Recommendation 5: Determine an appropriate methodology for calculating workloads and caseloads when recommending staffing allocations for licensed service providers.

Calculating individual staff workload will support the District and Special Education Department with a quantitative means to determine the appropriate number of FTEs for Intervention Specialists and related service providers. Although there are many different methods for calculating workload (and ODE allows for flexibility in this area), it is recommended that the Department select a methodology in collaboration with the Westerville Education Association (WEA) and other stakeholders. The Department will also need to determine what and how data will be collected and ensure that all special education staff are trained on the defined procedures and protocols. Central office administrators will also need to be trained on how to analyze and calibrate data to inform staffing recommendations. It is recommended that staff workloads are calculated at least two times per year to calibrate for growth and plan staffing for the following school year.

Other considerations that also drive staffing levels are discussed in more detail in later chapters of this report. They include:

- The need for service minutes in student IEPs to reflect accurately any time a SWD receives specially designed instruction (SDI), regardless of the educational setting. Service minutes in student IEPs are used to calculate staff workload. (See *Chapter 4 – Student Identification, Evaluation, and Placement.*)

- The need for school master schedules to support efficient service delivery models. While the central office is responsible for allocating positions to campuses, responsibility for how those positions are utilized often rests with campus administrators. Inefficient service delivery models contribute to perceptions that staffing resources are inadequate. (See *Chapter 5 – Program Design and Implementation.*)

Financial Management

Special Education represents a significant and increasing investment of WCSD resources. Table 11 below presents annual operating expenditures (all funds) for Special Education by Object Code, or type of expenditure, from 2017-18 to 2020-21. Over this four-year period, total program expenditures increased $4,685,320 (14.8%) to more than $36.4 million. This increase was mostly driven by a 16.8% increase in personnel services and a 32.7% increase in other objects (e.g., County Board of Education Contributions, Out of Court Settlements).

Table 11. WCSD Special Education FYTD Actual Expenditures (All Funds), 2018 and 2021

Object Code Category	2018	2021	Δ
100 Personal Services – Employees' Salaries and Wages	$15,745,663	$18,389,884	$2,644,221
200 Employees' Retirement and Insurance Benefits	$5,419,052	$6,397,462	$978,410
400 Purchased Services	$5,082,879	$4,283,128	($799,751)
500 Supplies and Materials	$217,333	$360,141	$142,808

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Object Code Category	2018	2021	Δ
600 Capital Outlay	$7,097	$3,836	($3,261)
800 Other Objects	$5,264,794	$6,987,687	$1,722,893
Grand Total	**$31,736,818**	**$36,422,138**	**$4,685,320**

Source: WCSD provided data (Data Request #10)

Program expenditures per SWD increased $2,234 (16.5%) over this time period, as reflected in Table 12.

Table 12. WCSD Special Education FYTD Actual Expenditures (All Funds) per SWD, 2018 and 2021

Object Code Category	2017-18	2020-21	Δ
Total Special Education Expenditures	$31,736,818	$36,422,138	$4,685,320
Total SWD	2,249	2,216	(33)
Average Expenditures per SWD	**$14,112**	**$16,436**	**$2,324**

Source: WCSD provided data (Data Request #10)

Maintenance of Effort (MOE)

Maintenance of Effort (MOE) refers to the requirement that all school districts that receive federal funding under part B of the IDEA 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. In Ohio, a school district's Treasury Department is responsible for submitting calculations annually to ODE, and then ODE annually compares the total district local or state and local expenditures to the Education Management Information System (EMIS) to determine if MOE has been met. Districts are subsequently notified by the ODE's Office for Exceptional Children (OEC) if they failed IDEA MOE. A review of the District's expenditure data shows that WCSD is compliant with all MOE requirements.

Commendation 1: Average Medicaid revenue per Medicaid-eligible student increased 25% over the last five years.

School districts rely on Medicaid reimbursements to help offset the high costs of services for special education students with medical, emotional, behavioral, and mental health needs. WCSD participates in the Ohio Medicaid Schools Program (MSP), a voluntary program for districts to help offset special education costs mandated by the IDEA for Medicaid-enrolled students. Allowable expenditures include therapy services that are indicated on a student's IEP, specialized transportation services, and certain administrative activities. As shown in Figure 33 below, the District's Medicaid revenues decreased from FY17 to FY19 and then increased substantially from FY20 to FY21.

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Figure 33. WCSD Medicaid Revenue, 2017 to 2021
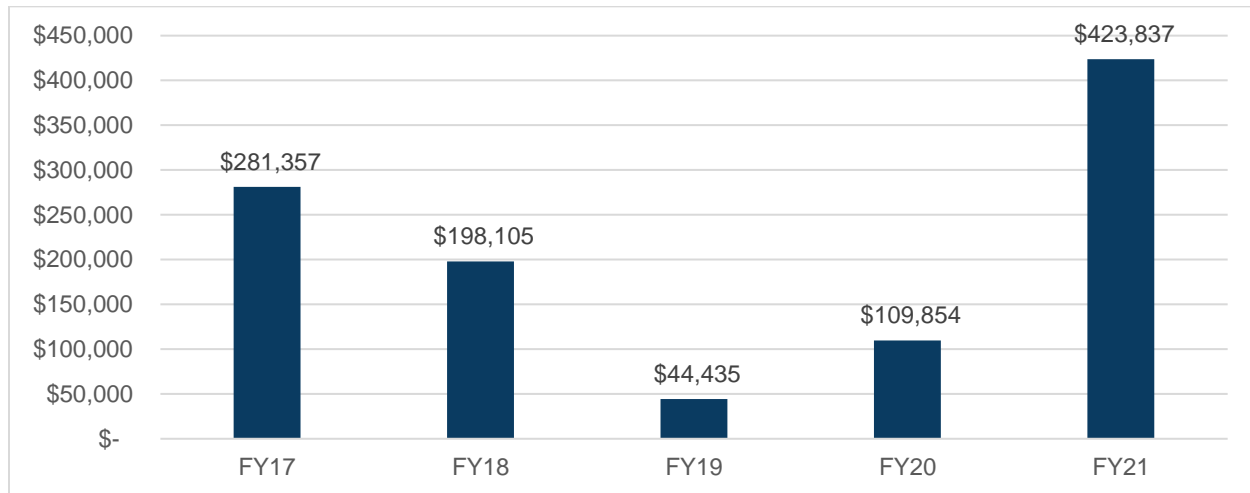
Source: WCSD provided data (Treasury Department)

Over this same period, the percentage of Medicaid-eligible students increased 3.1 percentage points and the average revenue per Medicaid-eligible student increased $92 (24.6%).

Table 13. WCSD Special Education Medicaid Eligibility Rates, 2017 to 2021

Year*	Number of Students with IEPs	Number of Students with IEPs Who Were Medicaid Eligible	% Students with IEPs Who Were Medicaid Eligible	Medicaid $ per Eligible SWD
FY17	1,872	752	40.2%	$374
FY20	2,235	858	38.4%	$128
FY21	2,136	909	42.6%	$466

Source: ODE

*FY18 and FY19 data are not available on the ODE website

In 2018-19, WCSD changed its Third-Party Administrator (TPA). Before the change, service providers did not actively collect and submit for reimbursement Medicaid-eligible services, evidenced by the low Medicaid revenues reported that year (Figure 33). Additionally, WCSD also renegotiated its contract with the WEA to explicitly include language for Medicaid billing. The WEA master contract states that "each bargaining unit member who by virtue of their work assignment is required to complete Medicaid billing, shall be provided the equivalent of up to four contract days at the individual bargaining unit member's per diem in order to complete such billing". Members are responsible for keeping a timesheet of the hours worked outside of the contract to complete Medicaid billing and submit a timesheet to the Treasurer's office for payment no later than June 30th of the school year.[14] Although not specified in the contract, the Department

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[14] Master contract between the WEA and the Westerville Board of Education, effective August 1, 2021 through July 31, 2024.

encourages all service providers to submit their required documentation for reimbursement on the first Monday of each month and sends quarterly reminders to all staff to do so.

Program Compliance and Accountability

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

Table 14 below shows WCSD's outcomes for the 2018-19 school year (2019-20 District Profile). Overall, WCSD achieved a Special Education performance rating of "Meets Requirements", having met State targets for 17 of the 23 indicators.[15]

Table 14. SPP Indicators and WCSD Outcomes, 2019-20

Indicator	WCSD Rate	ODE Target*	WCSD Met Target
Are young children with disabilities entering kindergarten ready to learn?			
6A. Regular Preschool Setting	77.8%	≥52.3%	Yes
6B. Separate Preschool Setting	10.2%	≤38.4%	Yes
7A. Preschool Social-Emotional Skills – Increased Rate of Growth	91.8%	≥81.0%	Yes
7A. Preschool Social-Emotional Skills – Age Level Skills at Exit	36.7%	≥52.0%	No
7B. Preschool Acquisition and Use of Knowledge and Skills – Increased Rate of Growth	91.7%	≥81.2%	Yes
7B. Preschool Acquisition and Use of Knowledge and Skills – Age Level Skills at Exit	42.9%	≥51.3%	No
7C. Preschool Use of Appropriate Behaviors to Meet Their Needs – Increased Rate of Growth	91.7%	≥83.3%	Yes
7C. Preschool Use of Appropriate Behaviors to Meet Their Needs – Age Level Skills at Exit	51.0%	≥62.5%	No
Are children with disabilities achieving at high levels?			
3B. Reading Participation Rate*	99.1%	≥98.0%	Yes
3B. Math Participation Rate*	99.1%	≥98.0%	Yes
3C. Reading Proficiency Rate*	33.4%	≥25.9%	Yes
3C. Math Proficiency Rate*	32.5%	≥29.5%	Yes

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[15] Some indicators are not measured every year and are noted as "NR". In 2018-19, six indicators were not measured.

Indicator	WCSD Rate	ODE Target*	WCSD Met Target
4A. Discipline Discrepancy Rate	<1.0%	<1.0%	Yes
4B. Discipline Discrepancy Rate by Race	NR	<2.5%	NR
5A. SWD Served in Regular Classroom ≥ 80% of the Day	60.8%	>65.0%	No
5B. SWD Served in Regular Classroom < 40% of the Day	14.9%	≤10.0%	No
5C. SWD Served in Separate Facilities	1.9%	≤4.0%	Yes
Are youth with disabilities prepared for life, work and postsecondary education?			
1. Graduation Rate*	78.2%	≥73.8%	Yes
2. Drop-out Rate*	10.1%	≤21.5%	Yes
13. Secondary Transition	100%	100%	Yes
14A. Post-School Outcomes – In Higher Ed	NR	≥39.7%	NR
14B. Post-School Outcomes – In Higher Ed or Competitively Employed	NR	≥75.0%	NR
14C. Post-School Outcomes – In Higher Ed, Competitively Employed, or Training	NR	≥84.0%	NR
Does the district implement IDEA to improve services and results for children with disabilities?			
8. Parent Involvement Survey	NR	94.0%	NR
11. Child Find	99.4%	100%	No
Are children receiving equitable services and supports?			
9. Disproportionality in Special Education	≤2.5%	≤2.5%	Yes
10. Disproportionality in Specific Disabilities	≤2.5%	≤2.5%	Yes

Source: Ohio Department of Education

*2018-19 ODE Target

**Some indicators are not measured every year and are noted as "NR".

Table 15 below compares WCSD to the five benchmark districts for each measured indicator.

Table 15. SPP Indicators and Outcomes, WCSD and Comparator Districts, 2019-20

Indicator	Westerville City	South Western	Lakota Local	Hilliard City	Pickerington Local	Worthington City
Are young children with disabilities entering kindergarten ready to learn?						
6A. Regular Preschool Setting	Yes	Yes	Yes	Yes	No	Yes
6B. Separate Preschool Setting	Yes	Yes	Yes	Yes	No	Yes

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Indicator	Westerville City	South Western	Lakota Local	Hilliard City	Pickerington Local	Worthington City
7A. Preschool Social-Emotional Skills – Increased Rate of Growth	Yes	Yes	Yes	Yes	No	Yes
7A. Preschool Social-Emotional Skills – Age Level Skills at Exit	No	No	No	Yes	No	No
7B. Preschool Acquisition and Use of Knowledge and Skills – Increased Rate of Growth	Yes	Yes	Yes	Yes	Yes	No
7B. Preschool Acquisition and Use of Knowledge and Skills – Age Level Skills at Exit	No	No	No	Yes	Yes	Yes
7C. Preschool Use of Appropriate Behaviors to Meet Their Needs – Increased Rate of Growth	Yes	Yes	Yes	Yes	No	Yes
7C. Preschool Use of Appropriate Behaviors to Meet Their Needs – Age Level Skills at Exit	No	No	No	Yes	Yes	No
Are children with disabilities achieving at high levels?						
3B. Reading Participation Rate*	Yes	Yes	Yes	Yes	Yes	Yes
3B. Math Participation Rate*	Yes	Yes	Yes	Yes	Yes	No
3C. Reading Proficiency Rate*	Yes	Yes	Yes	Yes	Yes	Yes
3C. Math Proficiency Rate*	Yes	No	Yes	Yes	Yes	Yes
4A. Discipline Discrepancy Rate	Yes	NR	NR	NR	NR	NR
4B. Discipline Discrepancy Rate by Race	NR	NR	NR	NR	NR	NR
5A. SWD Served in Regular Classroom ≥ 80% of the Day	No	Yes	No	Yes	Yes	Yes
5B. SWD Served in Regular Classroom < 40% of the Day	No	No	No	Yes	Yes	Yes
5C. SWD Served in Separate Facilities	Yes	Yes	Yes	Yes	Yes	Yes

Indicator	Westerville City	South Western	Lakota Local	Hilliard City	Pickerington Local	Worthington City
Are youth with disabilities prepared for life, work and postsecondary education?						
1. Graduation Rate*	Yes	Yes	Yes	Yes	Yes	Yes
2. Drop-out Rate*	Yes	Yes	Yes	Yes	Yes	Yes
13. Secondary Transition	Yes	Yes	Yes	Yes	Yes	Yes
14A. Post-School Outcomes – In Higher Ed	NR	NR	NR	NR	NR	NR
14B. Post-School Outcomes – In Higher Ed or Competitively Employed	NR	NR	NR	NR	NR	NR
14C. Post-School Outcomes – In Higher Ed, Competitively Employed, or Training	NR	NR	NR	NR	NR	NR
Does the district implement IDEA to improve services and results for children with disabilities?						
8. Parent Involvement Survey	NR	NR	NR	NR	NR	NR
11. Child Find	No	Yes	Yes	Yes	Yes	Yes
Are children receiving equitable services and supports?						
9. Disproportionality in Special Education	Yes	Yes	Yes	Yes	Yes	Yes
10. Disproportionality in Specific Disabilities	Yes	Yes	No	Yes	Yes	No

Source: Ohio Department of Education

*2018-19 ODE Target

Note: Some indicators are not measured every year and are noted as "NR".

Finding 6: Department administrators cannot easily access or analyze a cross-section of student information needed for decision-making.

The primary information systems utilized by the Special Education Department are *IEP Anywhere,* the special education student information system that contains IEPs for both students with disabilities and students with a Section 504 plan, and *PowerSchool,* the District's student information system. The Department also analyzes student performance and progress monitoring data housed in other curriculum-based platforms such as *iReady*, *S.P.I.R.E., Bridges,* and *Panorama*. None of these systems are integrated, requiring administrators to generate reports from disparate information systems for reporting and analysis. Special Education administrators rely on the Academic Enrichment Center (AEC) to provide reports related to student discipline (e.g., in-school suspensions, out-of-school suspensions, Manifestation Determination Reviews (MDRs)), and student performance (e.g., OST scores). Discipline data are provided to the Department quarterly, which is insufficient for monitoring compliance on this indicator. Further, classroom-

level data regarding student progress on IEP and BIP goals, and the use and effectiveness of accommodations and modifications, is housed in teacher-created documents.

The Department does not have the ability to analyze longitudinal student data across a variety of indicators, such as academic growth, discipline incidents, LRE changes, and eligibility changes.

The District previously implemented a data management and analytics solution that would have provided real-time insights into district data across multiple systems via a data dashboard. Feedback provided by various central office administrators during this review was consistent in that the implementation was unsuccessful and the system is not currently being used.

Recommendation 6: Implement a data management system that allows for real-time access and analysis of student data across multiple platforms.

The review team acknowledges that there may be some resistance to this recommendation due to the challenges the District experienced recently with during the attempted implementation of a data management system. Nonetheless, having such a system, accompanied with data visualization tools (i.e., data dashboard) is necessary to support management analysis of up-to-date information about students, teachers, and schools in order to make better-informed and more impactful decisions to improve instructional practices and student achievement.

A data dashboard can provide a visual display of key performance indicators (KPIs), metrics, and other data points that would be useful to district administrators, campus leaders, student support teams (SSTs), and professional learning communities (PLCs) as they make decisions related to serving students with disabilities (and all students).

Chapter 4 – Student Identification, Evaluation, and Placement

This Chapter provides an overview of the District's processes for identifying and placing students in Special Education. It is organized into the following sections:

- Student Identification

- Multi-Tiered System of Supports (MTSS)

- Individualized Education Program (IEP)

- Section 504

Student Identification

In accordance with federal law, WCSD assumes responsibility for the location, identification, and evaluation of all children from birth through age 21 who reside within the district and who require special education and related services. This includes students who are advancing from grade to grade; enrolled by their parents in private elementary or secondary schools, including religious schools located in the district (regardless of the severity of their disability); wards of the state; children who are highly mobile, such as migrant and homeless children; and, children who are home-schooled. Child Find is legally required and is the first step in finding children with disabilities and getting them the support and services, they need to succeed in school.

Representation by Student Demographics

WCSD has a diverse student population, with representation that includes White (52.3%), Black or African-American (26.2%), Two or More Races (8.8%), Hispanic/Latino (8.0%), and Asian (4.6%) students. The demographics of SWD closely mirror the non-SWD/Section 504 (i.e., "Other Students") population (Figure 34). However, the demographics of students with a Section 504 plan differ significantly from the non-SWD/Section 504 student population, with White students overrepresented by 21.2 percentage points, Black or African American students underrepresented by 15.9, and Hispanic/Latino students underrepresented by 3.4 percentage points.

Figure 34. Representation of SWD, Section 504, and Other Students by Race/Ethnicity, 2021-22
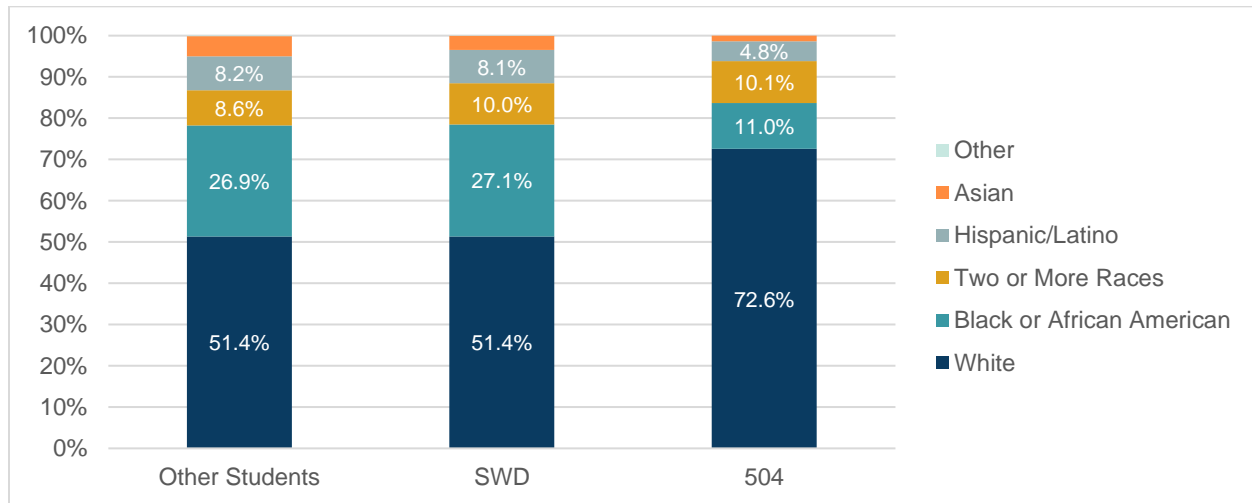
Source: WCSD Student Enrollment Data (DR #33/34 Revised)

Students who are economically disadvantaged or have limited English proficiency (LEP) are over-represented in the special education student population and are underrepresented in the Section 504 student population (Figure 35).

Figure 35. Representation of SWD, Section 504 and Other Students by Disadvantagement and LEP Status, 2021-22
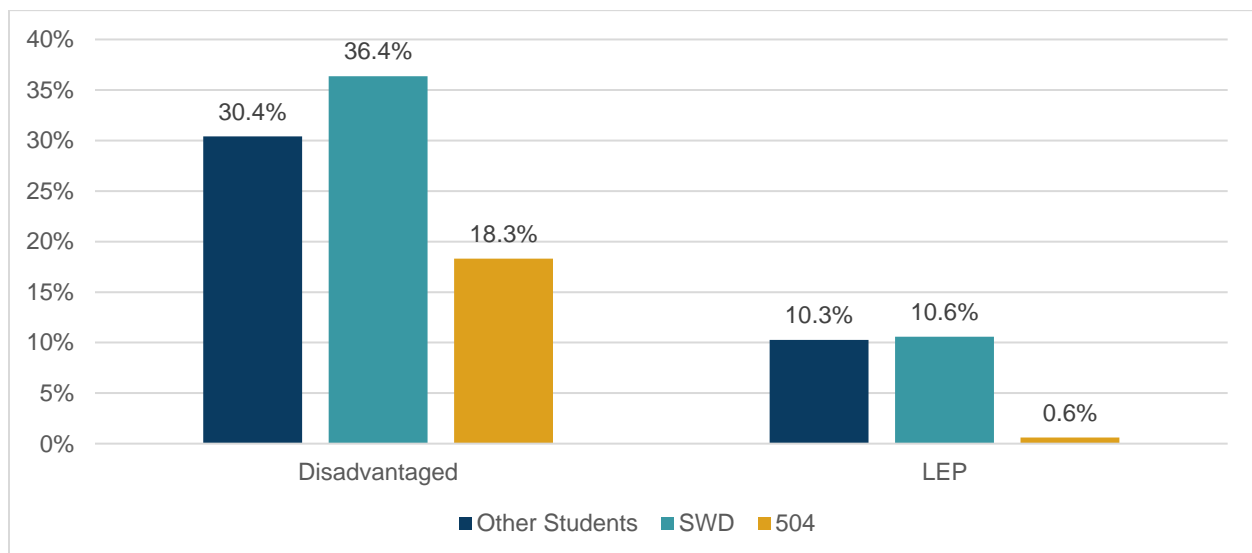
Source: WCSD Student Enrollment Data (DR #33/34 Revised)

Male students are overrepresented in both the special education and Section 504 student populations by 15.1% and 9.2% percentage points, respectively.

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Figure 36. Representation of SWD, Section 504 and Other Students by Gender, 2021-22
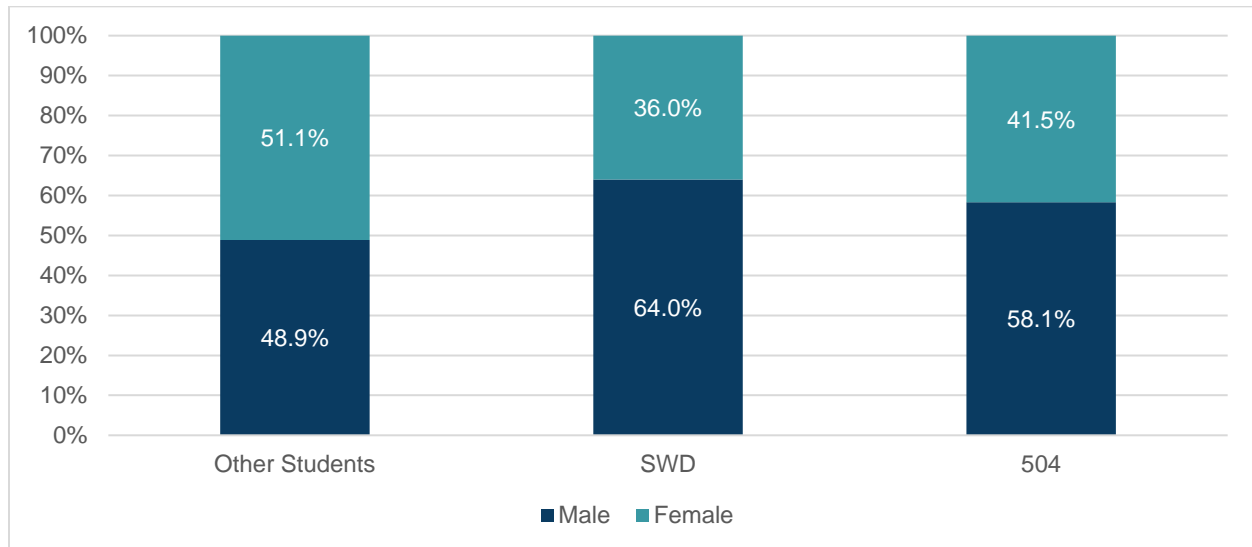
Source: WCSD Student Enrollment Data (DR #33/34 Revised)

The state of Ohio defines a gifted student as one who "performs or shows potential for performing at remarkably high levels of accomplishment when compared to others of their age, experience, or environment." Approximately 15% of students in Ohio are identified as gifted.[16] In WCSD, 22.6% of the total student population is identified as gifted and receiving program services. Students who are receiving both special education and gifted services are commonly referred to as twice-exceptional (2E). In WCSD, 2E students account for 5.6% of the special education student population and 29% of the Section 504 student population.

Figure 37. Representation of SWD, Section 504 and Other Students by Gifted Status, 2021-22

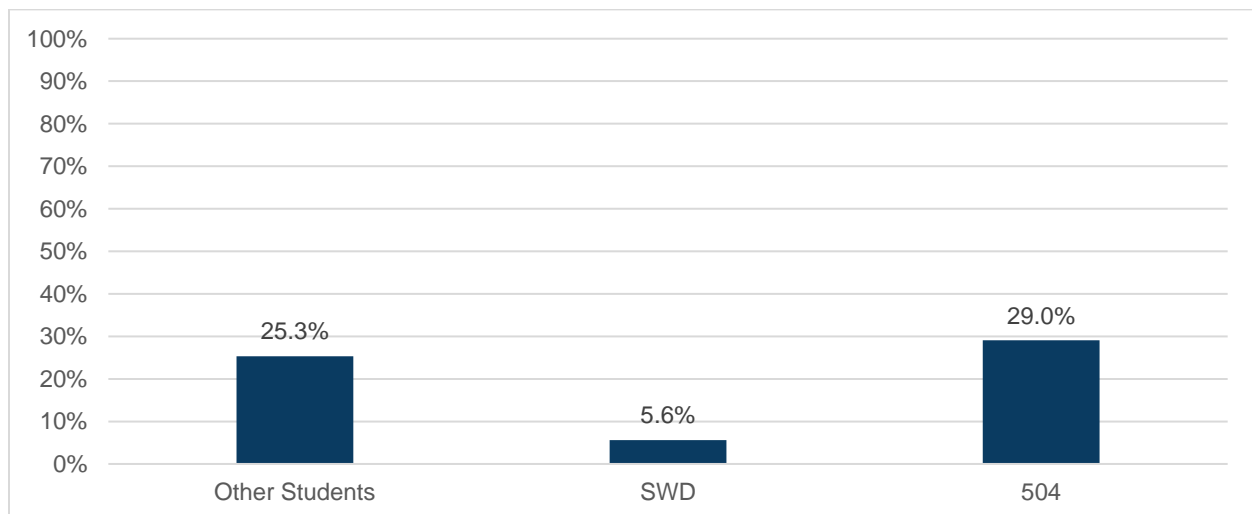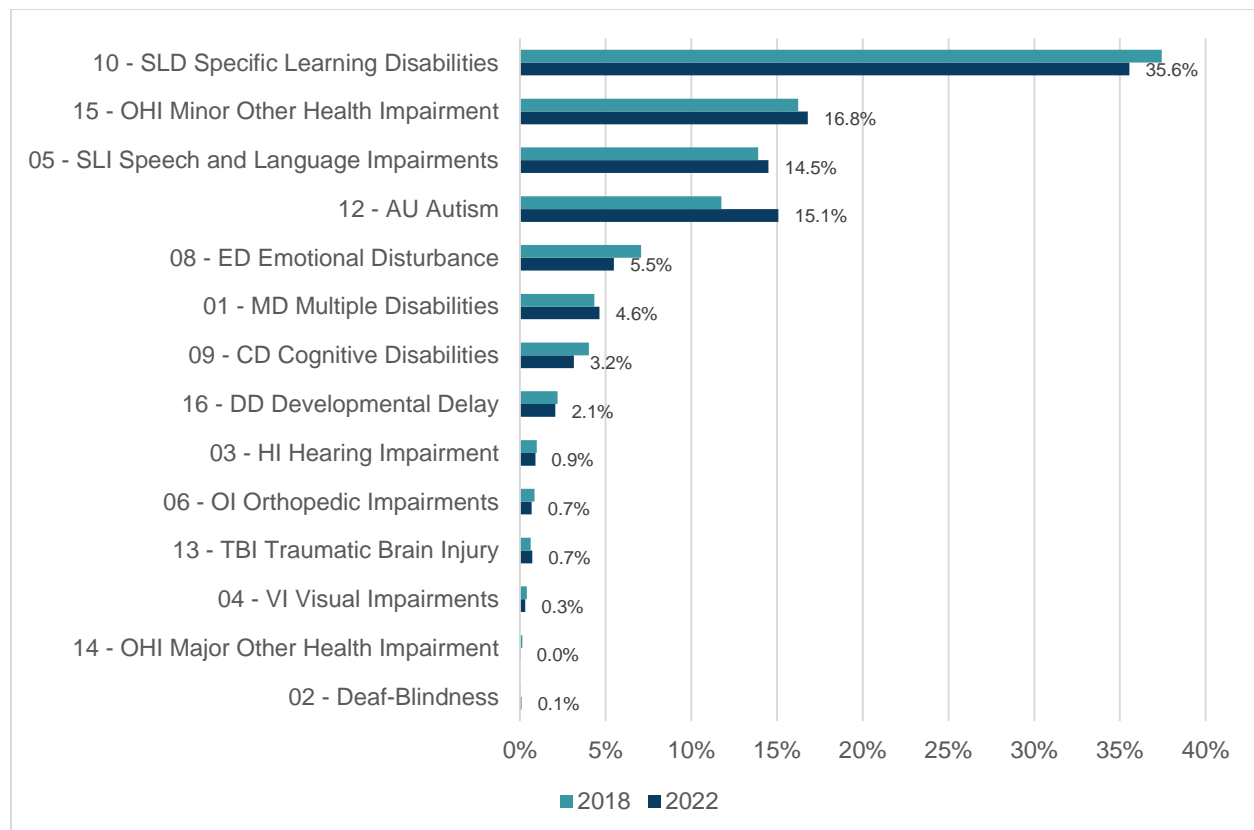Source: WCSD Student Enrollment Data (DR #33/34 Revised)

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[16] Referenced at: https://education.ohio.gov/Topics/Other-Resources/Gifted-Education.

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Representation by Disability Category

The Individuals with Disabilities Education Act (IDEA) lists thirteen different disability categories under which children ages 3 through 21 can qualify for special education services. To qualify for special education and related services under the IDEA, a student must meet the definition of one or more of the 13 categories of disabilities *and* must need special education and related services as a result of their disability.

Figure 38 compares the percentage of students served in each disability category from 2017-18 to 2021-22. Representation of students across the disability categories has remained relatively constant over the past five years, except for students with Autism, which increased 3.3 percentage points, and students with Specific Learning Disabilities and Emotional Disturbance, which decreased 1.9 and 1.6 percentage points, respectively.

Figure 38. SWD Representation by Primary Disability, 2017-18 and 2021-22

Source: WCSD Student Enrollment Data (DR #33/34 Revised)

Note: Disability categories are representative of the student's primary disability.

In 2021-22, four disability categories – Specific Learning Disabilities (SLD), Other Minor Health Impairment (OHI), Autism (AU), and Speech and Language Impairment (SLI) – accounted for 79.3% of all SWD in WCSD. These disabilities are often referred to as "high incidence disabilities" because they typically comprise the most common disability types in school systems. Three of these disabilities (SLD, OHI, and AU), along with Developmental Delay (DD), are also commonly referred to as "judgmental disabilities"

because they are open to varying interpretations of eligibility. As a result, students with similar characteristics may be identified as having different disabilities.

The IDEA defines the eligibility criteria for SLD, OHI, AU, and DD as follows:[17]

- Specific Learning Disability (SLD) is "a disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, which disorder may manifest itself in the imperfect ability to listen, think, speak, read, write, spell or do mathematical calculations, including conditions such as perceptual disabilities, brain injury, minimal brain dysfunction, dyslexia, and developmental aphasia." To determine whether a student is eligible for special education due to an SLD, the district must evaluate the student in compliance with special evaluation procedures in addition to the general evaluation requirements for all students with disabilities.

- Other Health Impairments (OHI) encompasses a wide range of medical conditions. According to the IDEA, the condition must result in the student's "limited strength, vitality, or alertness," and the condition must result in the need for special education and related services. Examples of chronic or acute health conditions which may render students eligible include asthma, attention deficit hyperactivity disorder, diabetes, lead poisoning, leukemia, and Tourette syndrome.

- Autism (AU) refers to "a developmental disability significantly affecting verbal and nonverbal communication and social interaction, generally evident before age three, that adversely affects a child's educational performance." This federal definition then proceeds to name traits commonly related to the condition: "Other characteristics often associated with autism are engaging in repetitive activities and stereotyped movements, resistance to environmental change or change in daily routines, and unusual responses to sensory experiences."

- Developmental Delay (DD) - Because it is often difficult to obtain a medical diagnosis of certain disabilities in very young children, the IDEA gives states the option to recognize children ages 3 through 9, or any subset of that age range, who need special education and related services as a result of developmental delays in physical development, cognitive, communication, social or emotional development, or adaptive development as children with disabilities. Ohio recognizes and defines DD as an eligibility category for children ages 3 through 5 who are experiencing a delay in one or more of the following areas: physical development, cognitive development, communication development, social or emotional development, or adaptive development. The term may be used in place of the following disability categories: intellectual disability, emotional disturbance, and speech or language impairment.

Table 16 compares the percentage of students served in each disability category for WCSD and the benchmark districts. Notably, there are wide variations in the percentages of students identified with the "judgmental disabilities," which may be a reflection of differences in the identification and evaluation practices across districts (e.g., the percentage of students with Autism ranges from 11.2% at Hilliard City to 17.3% at Pickerington Local). OHI is shaded in blue because WCSD's identification rate is notably lower (3.2 percentage points) than the average of the comparator districts, and SLD is shaded in orange because

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[17] 34 CFR 300.8(a)(1).

WCSD's identification rate is notably higher (2.5 percentage points) than the average of the comparator districts; WCSD's identification rate is within 1.5 percentage points of the comparator district average for all other disability categories.

Table 16. SWD Representation by Primary Disability, FY 2020-21*

Disability	Hilliard City	Lakota Local	Pickerington Local	South-Western City	Westerville City	Worthington City
Autism**	11.2%	13.3%	17.3%	11.5%	11.9%	13.1%
Cognitive Disabilities	3.5%	4.7%	2.5%	6.8%	3.7%	2.9%
Deaf-Blindness	<0.4%	0.0%	0.0%	0.0%	0.0%	<0.6%
Deafness (Hearing Impairments)	0.8%	0.7%	<0.7%	0.4%	<0.5%	0.8%
Developmental Delay**	1.4%	0.0%	1.2%	2.1%	1.2%	1.6%
Emotional Disturbance (SBH)	2.6%	5.1%	5.4%	4.5%	5.7%	4.9%
Multiple Disabilities (other than Deaf-Blind)	2.2%	5.2%	3.6%	2.5%	4.6%	1.9%
Orthopedic Impairments	0.6%	<0.6%	<0.7%	0.7%	0.8%	<0.6%
Other Health Impaired (Major)	<0.4%	<0.6%	<0.7%	0.3%	<0.5%	<0.6%
Other Health Impaired (Minor)**	25.2%	21.9%	15.0%	24.5%	18.1%	20.2%
Specific Learning Disabilities**	35.8%	34.1%	39.8%	36.8%	40.0%	40.8%
Speech and Language Impairments	16.0%	13.2%	12.7%	9.4%	12.6%	12.5%
Traumatic Brain Injury	<0.4%	0.8%	1.1%	0.4%	0.8%	<0.6%
Visual Impairments	<0.4%	<0.6%	<0.7%	0.2%	<0.5%	<0.6%

Source: Data obtained through ODE Public Information Request (PIR)

*2020-21 represents the most current year data from ODE

**Considered a "judgmental disability" because the criteria for eligibility is open to interpretation

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Representation by Student Demographics and Disability Category

ODE monitors school districts' significant disproportionality by identifying students with one of six primary disability categories by race/ethnicity. As shown in *Chapter 3 – Department Organization and Management* (Table 14), WCSD has met the State targets for Indicator 9 (Disproportionality in Special Education) and Indicator 10 (Disproportionality in Specific Disabilities) and has not been identified as having significant disproportionality in any category.

Figure 39 shows SWD representation by race/ethnicity and disaggregated by high incidence disability category. Black or African American students and Hispanic/Latino students are more likely to be identified as SLD than other students; Asian students are more likely to be identified with Autism than other students; and, White students are more likely to be identified as SLI than other students.

Figure 39. SWD Representation by High Incidence Disability Category and Race/Ethnicity, 2021-22
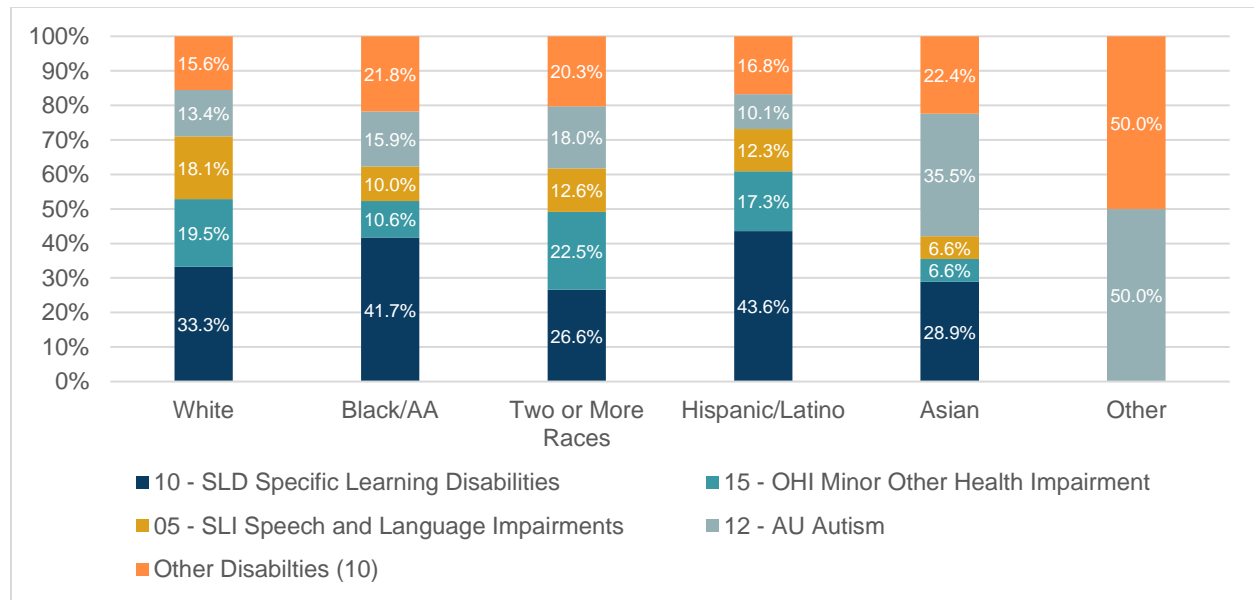
Source: WCSD Student Enrollment Data (DR #33/34 Revised)

Students with disabilities who are also disadvantaged are overrepresented in the SLD disability category (11.2 percentage points) and underrepresented in the SLI disability category (7.2 percentage points).

Figure 40. SWD Representation by High Incidence Disability Category and Disadvantagement, 2021-22

Source: WCSD Student Enrollment Data (DR #33/34 Revised)

Students with disabilities who are also LEP are overrepresented in the SLD disability category (16.9 percentage points) and underrepresented in the OHI and SLI disability categories (11.2 and 5.3 percentage points, respectively).

Figure 41. SWD Representation by High Incidence Disability Category and LEP, 2021-22

Source: WCSD Student Enrollment Data (DR #33/34 Revised)

Female students with disabilities are more likely to be identified with SLD than their male counterparts, while male students are more likely to be identified with Autism than female students; there are no significant differences across other disability categories.

Figure 42. SWD Representation by High Incidence Disability Category and Gender, 2021-22
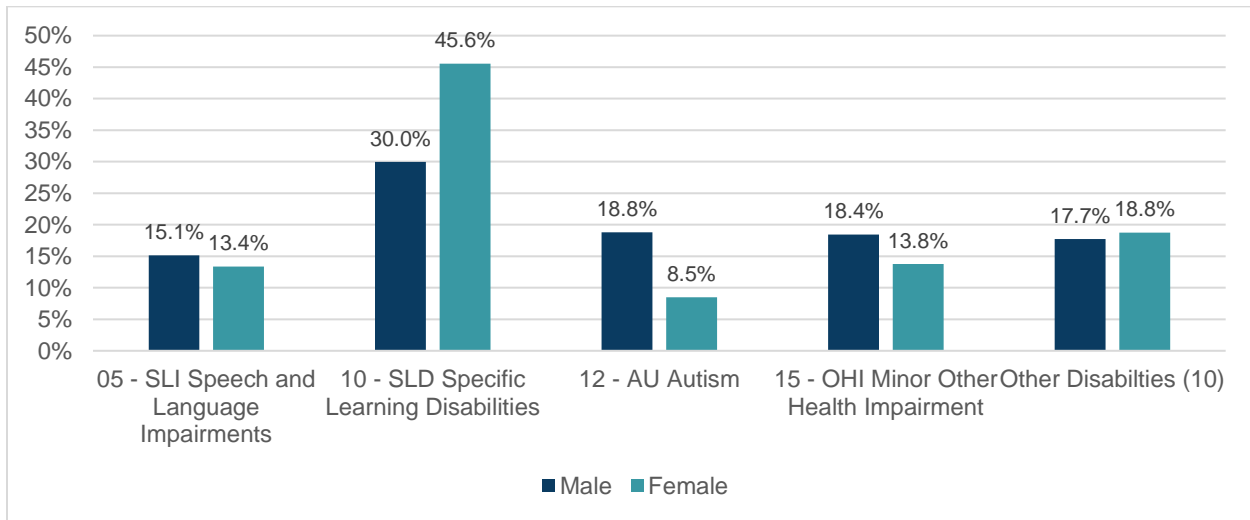
Source: WCSD Student Enrollment Data (DR #33/34 Revised)

Students with disabilities who are also gifted (2E) are overrepresented in the SLI (16.9 percentage points), Autism (7.8 percentage points), and OHI (6.8 percentage points) disability categories and underrepresented in the SLD disability category (24.1 percentage points).
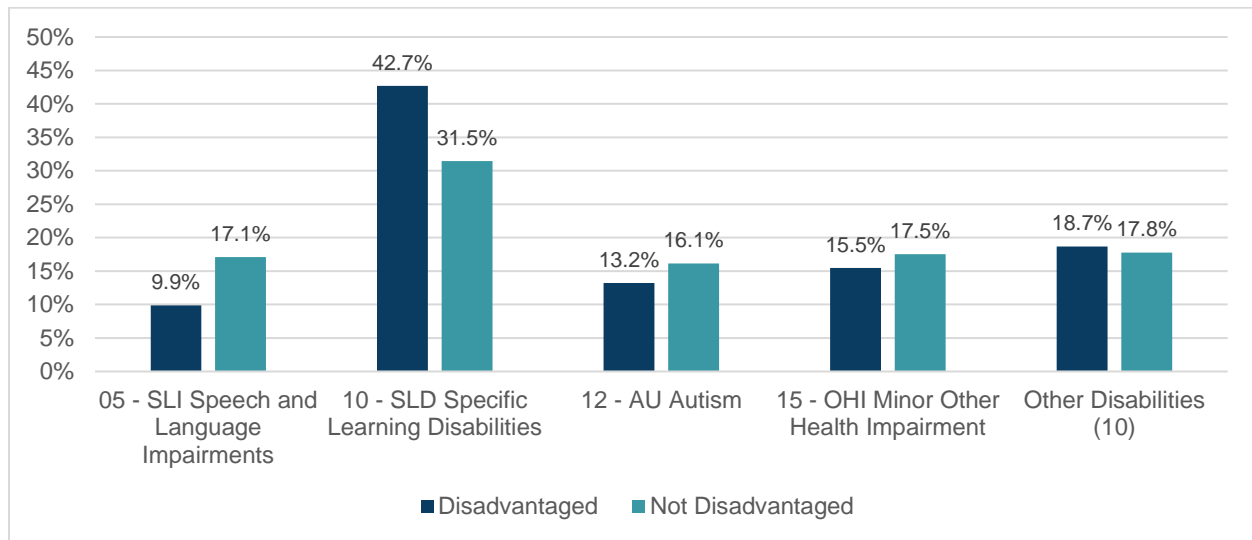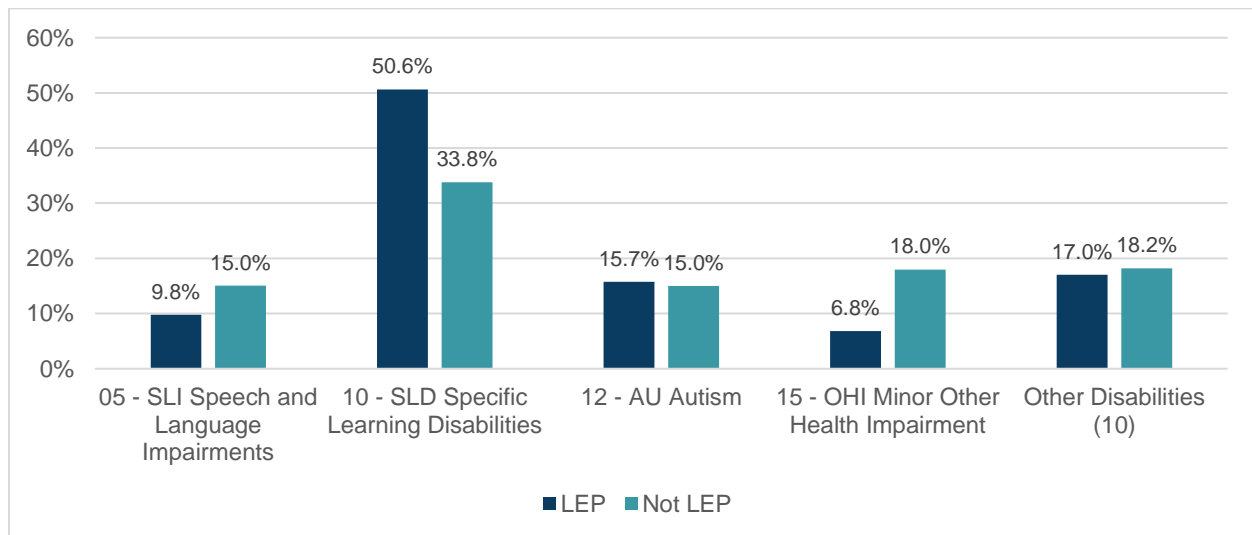
Figure 43. SWD Representation by High Incidence Disability Category and Gifted, 2021-22
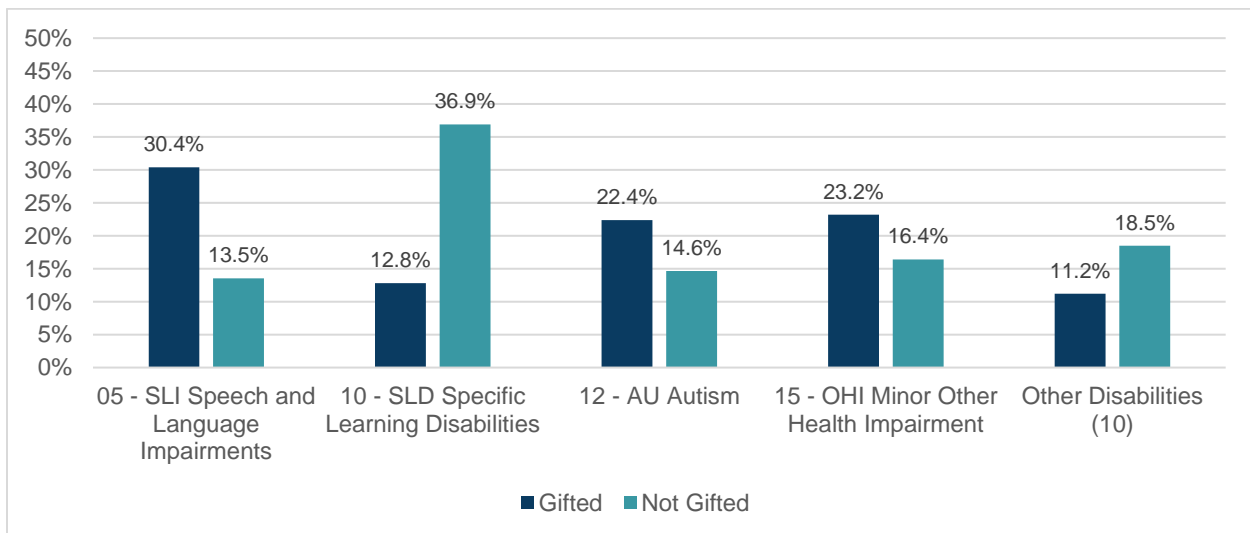
Source: WCSD Student Enrollment Data (DR #33/34 Revised)

Multi-Tiered System of Supports (MTSS)

Multi-Tiered System of Supports (MTSS) is an intervention and instructional framework that creates the necessary systems to ensure all students have access to a high-quality educational experience. This section reviews WCSD's progress towards implementing an MTSS framework across campuses. While intervention supports are offered as a core component of the general education curriculum, successful implementation of MTSS will reduce unnecessary referrals to special education.

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MTSS Framework

MTSS is a data-based, problem-solving framework that integrates instruction, intervention, and assessment to meet the academic and behavior needs of all students. It is designed to provide multiple levels of support for all students, including those with disabilities, with Section 504 plans, who are LEP and/or gifted, to close achievement gaps. MTSS provides universal academic and behavioral instruction and support to all students (Tier 1), adds targeted support/instruction as needed (Tier 2), and intensive, individualized support/instruction as needed (Tier 3). All levels of support are aligned with the universal core academic and behavior instruction and support that is a baseline for all students. When implemented as intended, MTSS leads to increased academic achievement by supporting rigorous core instruction, strategic/targeted interventions, and improved student behavior. Furthermore, the framework has been successfully used to support a reduction in disproportionate special education referrals of students based on race, gender, socioeconomic or English learner status.

As an umbrella framework, MTSS includes both Response to Intervention (RTI) and Positive Behavioral Intervention and Supports (PBIS). Figure 44 below illustrates the key components of each of these frameworks.

Figure 44. Multi-Tiered System of Supports (MTSS) Framework
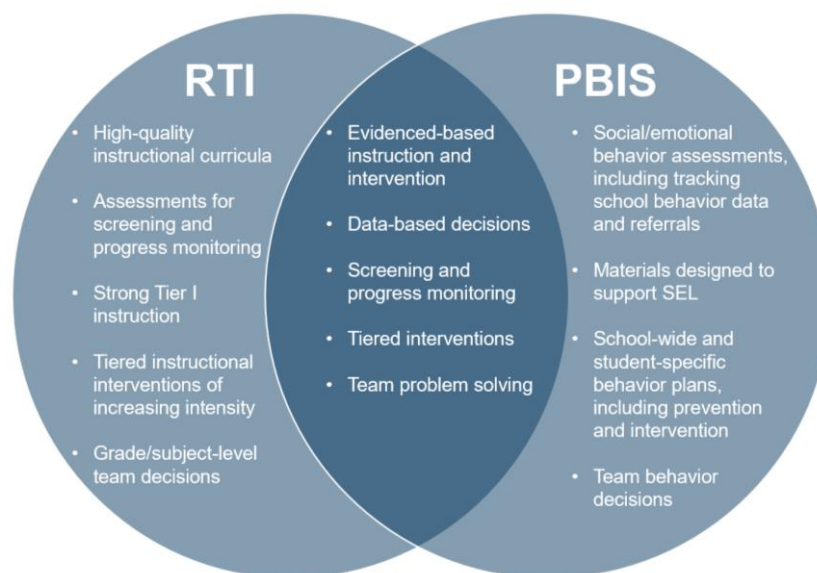
Source: Adapted by Gibson from multiple sources

MTSS/RTI Implementation in WCSD

Implementation of the MTSS framework in WCSD is in transition. In 2017-18, WCSD was audited by the Ohio Department of Education (ODE), which recommended that, among other things, the District streamline its MTSS/RTI processes. The ODE, through the State Support Team (SST), provided training to WCSD administrators on the MTSS framework. Subsequent to that training, a multi-departmental District Leadership Team (now referred to as the MTSS District Team), and a subcommittee (now referred to as

the MTSS Workgroup) comprised of a Special Education Coordinator and three LSSPs, were established with the goal of streamlining and improving district practices around MTSS.

In April 2019, the subcommittee provided training to all elementary and secondary principals based on information provided by the SST. The subcommittee also developed an Intervention Toolkit to provide information to guide teachers and intervention teams in providing proper supports to students. The Intervention Toolkit, which is in the format of an Excel spreadsheet, provides information on diagnosing a problem related to a specific area of concern, selecting a research-based intervention, setting an intervention schedule, and monitoring progress. Links to specific assessment tools are also included in the toolkit. All elementary principals and instructional coaches were trained on how to use the Intervention Toolkit so that they could then scaffold that information to teachers at their campus. Secondary schools are still operating under the old model of intervention with Intervention Assistance Teams (IAT) and will be trained in MTSS during the 2022-23 school year. PBIS training occurred for all secondary schools during 2021-22.

Commendation 2: WCSD utilizes several universal screeners to identify students who are at risk of learning difficulties.

Gaps in the basic skills are the root of many later learning difficulties, and early detection and intervention can help students reach their potential. Universal screening is the administration of an assessment to all students in a classroom to identify students who are at-risk for learning difficulties. WCSD utilizes several universal screeners and other instructional tools to determine which students may be struggling with reading and math skills, or behavioral skills.

- *iReady* is an assessment and instructional tool that provides an initial view of all students' foundational skills to help teachers identify students who may have challenges in reading or math.[18] *iReady* is administered three times per year to students in Kindergarten through Grade 8, and is often paired with classroom-based assessments through *Fundations*, *Bridges,* and other Board-approved curriculums.

- *Comprehensive Test of Phonological Processing (CTOPP)* is a norm-referenced assessment that helps to evaluate phonological processing abilities as a prerequisite to reading fluency. It is a measure of phonological awareness, phonological memory and naming, and is often used to identify students with Dyslexia. The CTOPP is administered to all Kindergarten students at the beginning of the year.

- *Panorama* is a universal screener used to measure and monitor students' social and emotional learning (SEL). Screener results are used with other information to support students academically and behaviorally.

[18] Only the assessment portion of *iReady* is currently being utilized.

Finding 7: The MTSS/RTI framework is not implemented consistently nor with fidelity at campuses, particularly at the secondary level.

Analysis of initial referral rates and quality of referrals to special education, quantitative feedback provided on the staff survey, and qualitative feedback provided to the review team by campus administrators and staff during school visits are all evidence of inconsistent MTSS/RTI practices across the district. Key observations related to each of these areas are discussed below.

Initial referral rates and the quality of referrals vary across campuses.

Two indicators of program quality are the initial referral rate and the quality of referrals (i.e., the percentage of students who meet the eligibility criteria for special education). The total number of initial referrals to special education have decreased 38.1% over the past four years, with the most significant drop occurring in the past two years as a result of the COVID-19 pandemic when many students were remote learning (Figure 45). Although it is not included in the figure below, the plurality of staff that provided feedback to the review team during individual and group interviews reported a significant increase in the number of initial referrals this year as students returned to in-person learning, and that the students being identified have significantly greater needs than in prior years. This is evidenced by the decrease in the percentage of students that did not qualify (DNQ) for special education services.[19] A low DNQ rate reflects more certainty in the referral process.

Figure 45. Total Initial Referrals and Eligibility Rates, 2017-18 to 2020-21
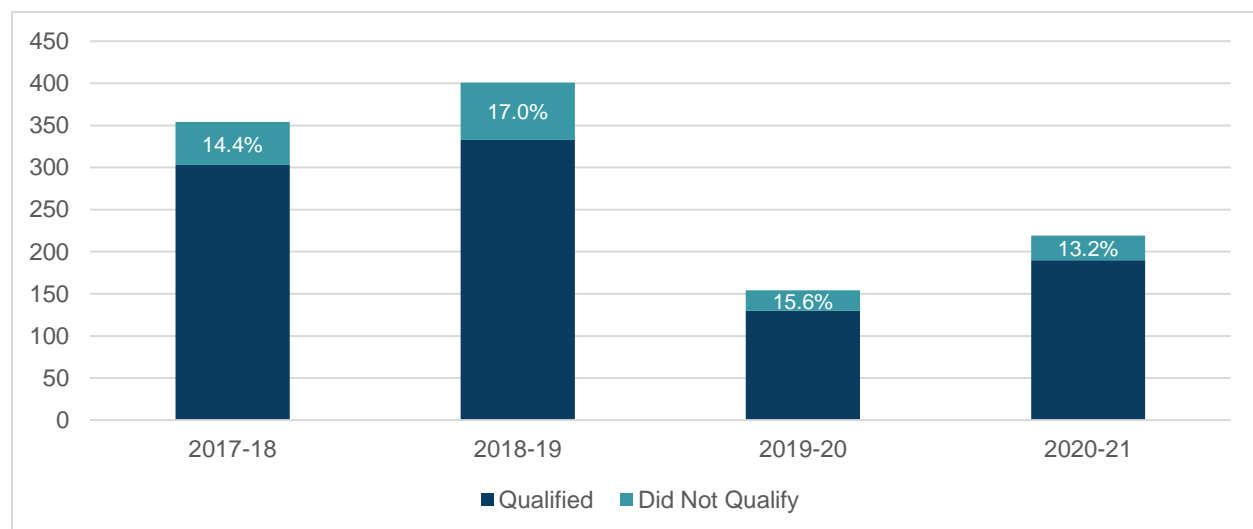
Source: WCSD Student Eligibility Data (DR #36)

Further analysis of referral data shows that the total number of initial referrals and qualifying rates vary across school levels. In 2020-21, referrals at elementary schools accounted for 69.4% of all initial referrals, while middle and high schools accounted for 8.7% and 10.5% of all initial referrals, respectively. Referrals from students who are home-schooled or are in a private or nonpublic school setting accounted for the

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[19] Suspected disability was not included in data files provided to the review team so it is unclear in which disability categories students did not qualify.

remainder of initial referrals (11.4%). While the total number of initial referrals decreased over the past four years, the decrease occurred disproportionately at middle schools, which accounted for 18.4% of all initial referrals in 2017-18, compared to 8.7% in 2020-21. This decrease may indicate problematic identification practices at middle schools. Conversely, initial referrals from students in a private or nonpublic school setting accounted for 5.6% of all initial referrals in 2017-18 and 10% of all initial referrals in 2020-21.

Figure 46. Total Initial Referrals for Special Education by School Level, 2017-18 to 2020-21
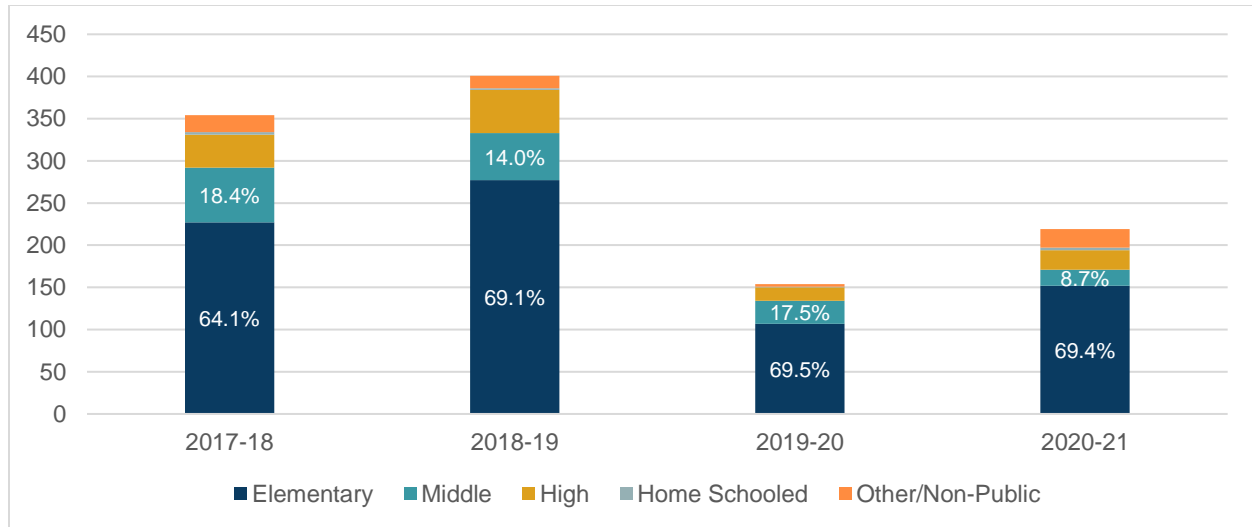
Source: WCSD Student Eligibility Data (DR #36)

In general, initial referrals at elementary schools have the lowest DNQ rates, while middle schools have the highest DNQ rates. On average, DNQ rates have decreased since 2018-19, mostly driven by decreased rates at elementary schools and for students in other/nonpublic settings. DNQ rates increased for middle and high school and home-schooled students (who represent less than 1% of all initial referrals).

Table 17. Percent DNQ by School Level, 2018 to 2021

Level	2017-18	2018-19	2019-20	2020-21
Elementary	9.7%	15.2%	15.0%	9.9%
Middle	27.7%	23.2%	18.5%	31.6%
High	17.9%	19.6%	12.5%	21.7%
Home Schooled	33.3%	0.0%	0.0%	33.3%
Other/Non-Public	15.0%	20.0%	33.3%	9.1%
Average	**14.4%**	**17.0%**	**15.6%**	**13.2%**

Source: WCSD Student Eligibility Data (DR #36)

Wide variations in referral and DNQ rates across campuses are important indicators of inconsistent early identification practices and MTSS effectiveness district-wide. For example, low DNQ rates may indicate that every attempt has been made to support students through early interventions, 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. Figure 47 below shows the total initial referrals for elementary schools disaggregated by the number of students who met (qualified) and did not meet (DNQ) the eligibility criteria for special education.

Figure 47. Total Initial Referrals and Eligibility Rates, Elementary Schools, 2020-21
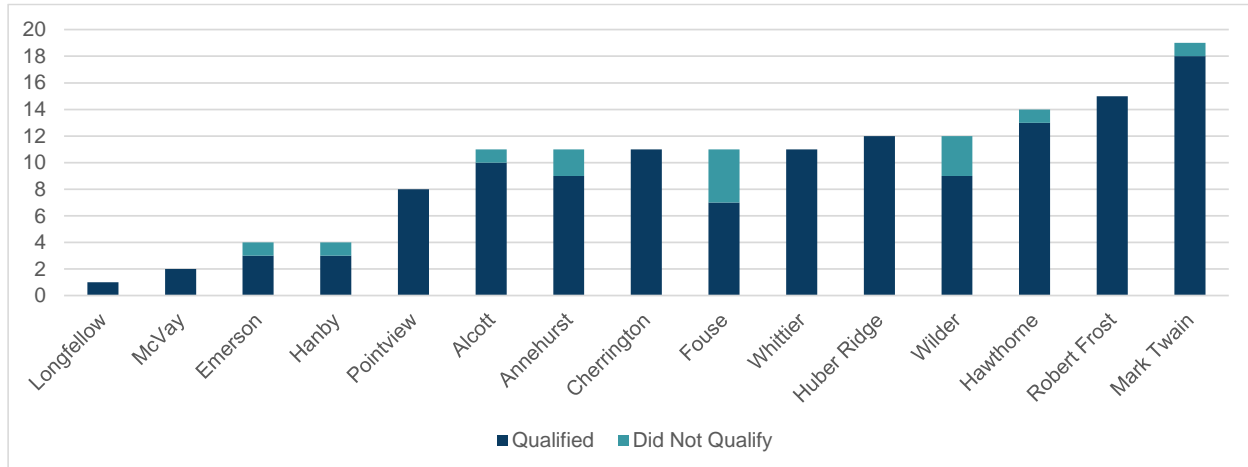
Source: WCSD Student Eligibility Data (DR #36)

Total initial and qualifying referrals also varied across secondary schools (Figure 48).

Figure 48. Total Initial Referrals and Eligibility Rates, Secondary Schools, 2020-21
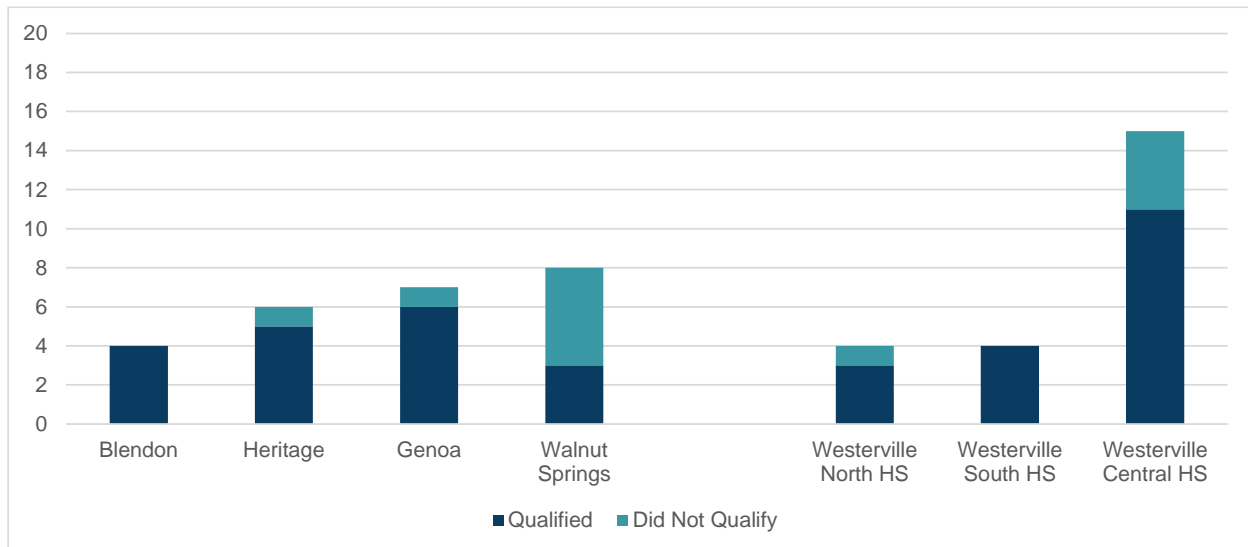
Source: WCSD Student Eligibility Data (DR #36)

A high percentage of staff that responded to the staff survey indicated that their campus does not have an effective early intervention model to address student academic and behavioral needs, and some staff perceives bias in intervention and referral practices.

Further evidence of inconsistent MTSS practices is supported by feedback on the staff survey. Overall, 66.5% of staff that responded to the survey agreed that an early intervention model is used at their campus

to address student learning needs and reduce referrals to special education. Agreement rates varied by position type category, with a relatively high percentage of staff indicating that they are not sure (63.3% of instructional aides, 29.8% of other student support services staff, and 20% of intervention specialists). Across all survey questions related to MTSS and/or interventions, there appears to be a wide disconnect between the perceptions of campus administrators and all other staff.

Figure 49. Staff Survey: MTSS/RTI or other early intervention model is used at my school to address individual learning needs and reduce referrals to special education.
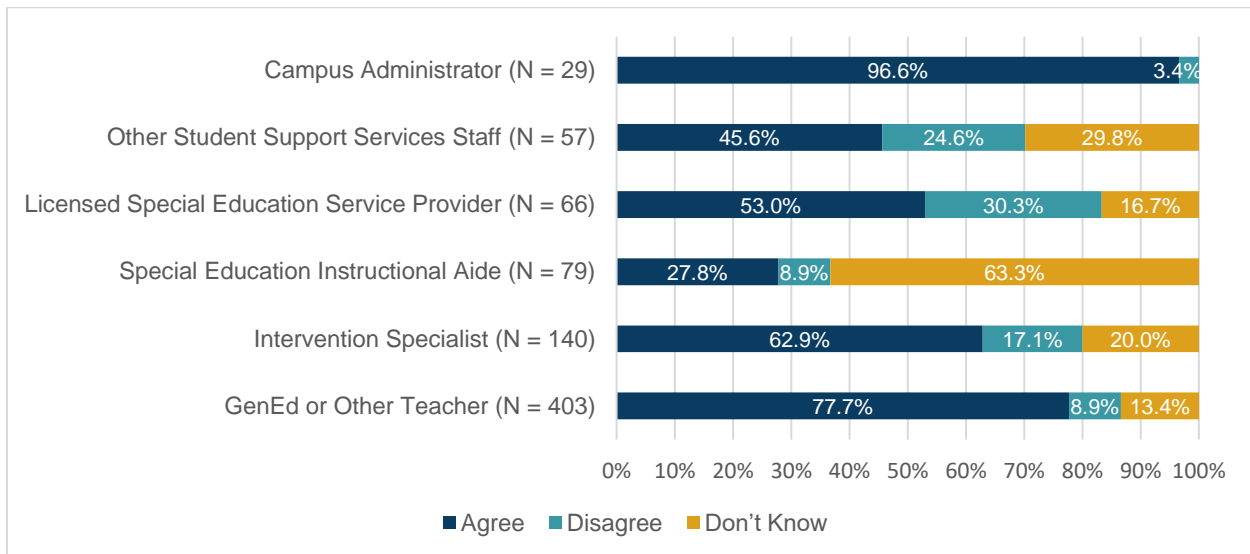
Source: Gibson Staff Survey

Agreement rates to this statement varied by school level. Staff at elementary schools had the highest rate of agreement (82.2%), while staff at the preschool had the highest rate of disagreement (28%).

Figure 50. Staff Survey: MTSS/RTI or other early intervention model is used at my school to address individual learning needs and reduce referrals to special education.

Source: Gibson Staff Survey

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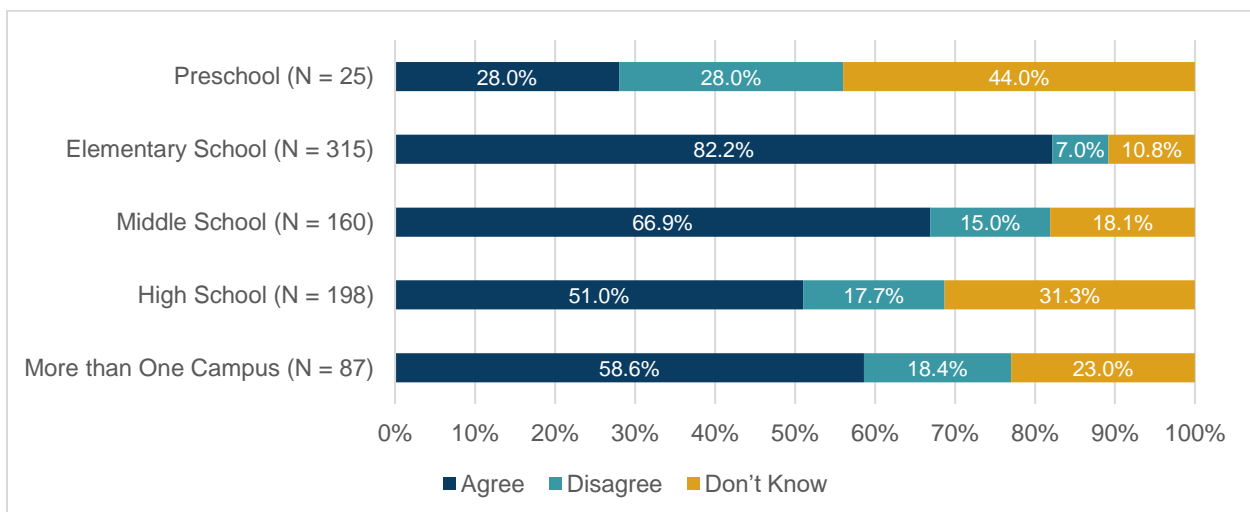
Staff was also queried about processes for academic and behavior interventions. Overall, 60% of staff agreed that their campus has a clear and effective process for providing academic interventions, while 30.9% of staff disagreed. Campus administrators had the highest rate of agreement (82.8%), and licensed special education service providers had the highest rate of disagreement (45.5%).

Figure 51. Staff Survey: My campus has a clear and effective process for providing academic interventions.
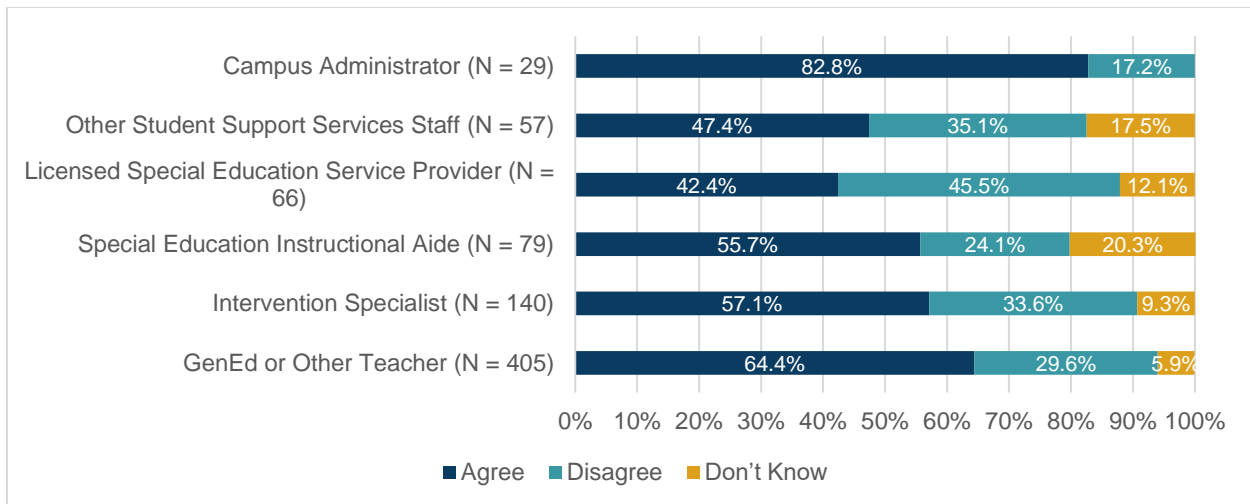
Source: Gibson Staff Survey

With the exception of staff at the preschool, rates of agreement and disagreement were similar across school levels.

Figure 52. Staff Survey: My campus has a clear and effective process for providing academic interventions.
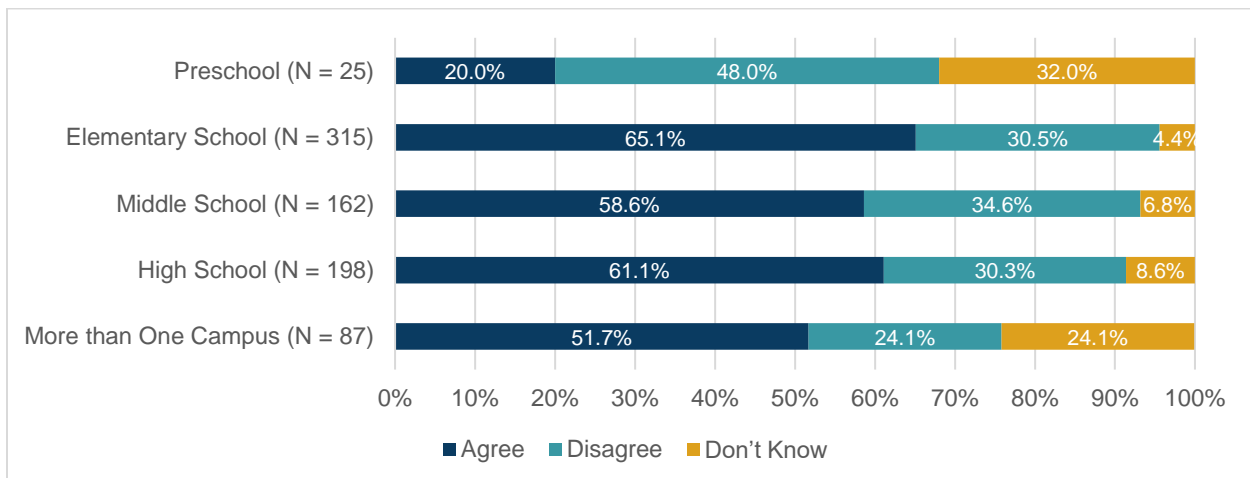
Source: Gibson Staff Survey

When asked about perceived bias in special education identification and evaluation processes, 65% of staff that responded to the survey agreed that the special education student identification and evaluation process is unbiased, while 20.5% of staff disagreed with this sentiment. Campus administrators had the highest rate

of agreement (72.4%), while licensed service providers had the highest rate of disagreement (33.3%). This is notable since the licensed special education service providers include the LSSPs, SLPs and other therapists directly involved in the evaluation process.

Figure 53. Staff Survey: The special education student identification and evaluation process is unbiased.
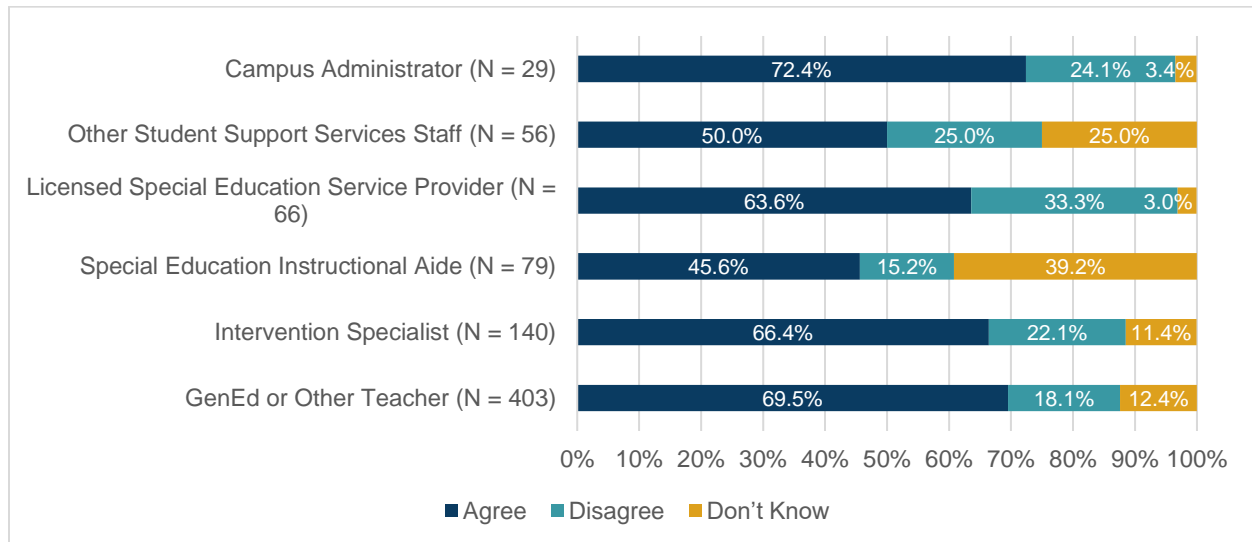
Source: Gibson Staff Survey

Staff at elementary schools had the highest rate of agreement (70%), while staff at the preschool had the highest rate of disagreement (40%).

Figure 54. Staff Survey: The special education student identification and evaluation process is unbiased.

Source: Gibson Staff Survey

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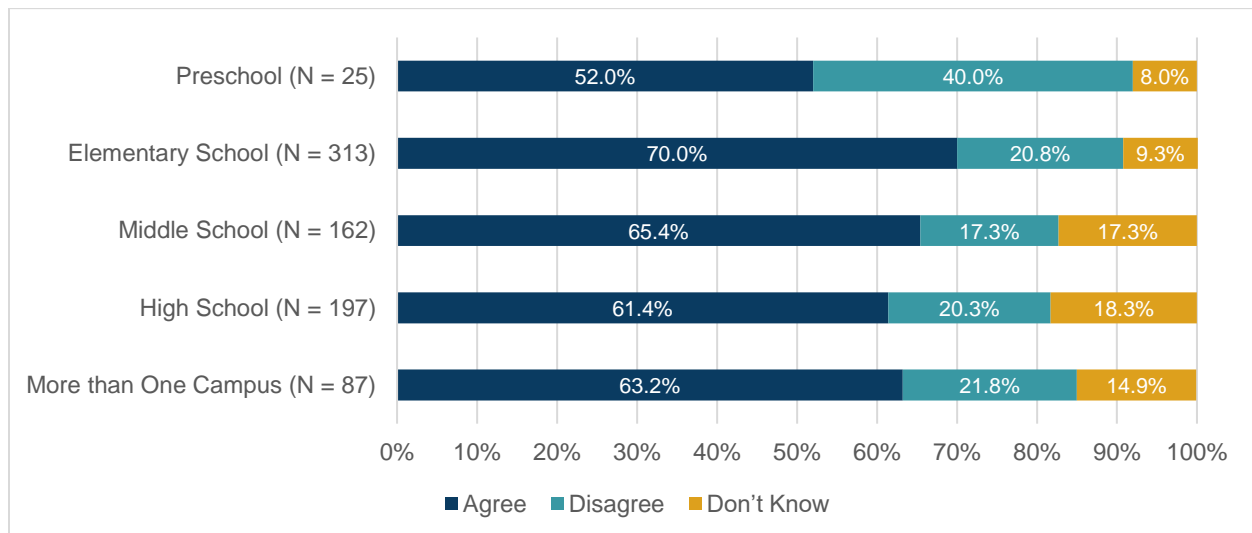
Varying approaches and practices for providing academic interventions were observed during campus visits and classroom observations.

The review team visited nine campuses and conducted 42 classroom observations. During that time, they conducted interviews with campus administrators and staff to better understand school structures and practices related to special education, including the provision of early interventions and supports to students who are struggling academically or behaviorally. Overall, elementary campuses had more defined intervention and pre-referral practices than what was observed at secondary campuses, and all campuses had different and school-specific strategies and approaches for implementing them. Below are some examples of differing practices reported by campus administrators during school visits:

- *Different vernaculars were used by administrators and staff when describing their early intervention teams.* Terms most frequently cited included the Student Support Team (SST), the Intervention Assistance Team (IAT), the RTI team, and the MTSS team. Having a common language is first and foremost when implementing a district-wide practice.

- *The position responsible for leading the student support team and the composition of student support teams also differed across campuses.* On some campuses, this role is performed by either the principal or assistant principal; on other campuses, it is performed by an instructional coach, a school psychologist, a counselor, or a TOSA. Having different positions responsible for this role across campuses makes it challenging for the central office to provide supports through role-specific professional development.

- *School schedules, particularly at the secondary level, do not consistently support intervention time.* At the middle and high school levels, academic interventions primarily occur in study halls (i.e., Academic Support Classes, Reading Lab, Math Lab). Teacher assignment to these classes is a rotating duty assignment and, per the WEA contract, teachers are not required to teach during this time. Anecdotal feedback provided to the review team is that some teachers provide interventions during this time; some do not. A haphazard approach to providing early interventions and supports will not close achievement gaps.

- *When specifically asked about the intervention resources and progress-monitoring tools, most campus-based staff were unfamiliar with the Intervention Toolkit.* This is problematic as this resource was designed specifically to support teachers and intervention teams in identifying and implementing research-based interventions.

- *There is not a consistent definition of Tier 2 and Tier 3 interventions.* Campus administrators described Tier 2 and Tier 3 interventions very differently. For example, one campus administrator noted that Tier 3 interventions are provided routinely by a general education teacher, while another administrator at a different campus noted that Tier 3 interventions were delivered in "special education cross-categorical classes." One administrator noted that Tier 3 interventions were "delivered by special education aides during their free time."

- *The duration and frequency of intervention cycles for academic interventions varied widely across campuses.* The duration of intervention cycles ranged from every three to four weeks at one campus to 10 to 12 weeks at another campus. For reference, the Intervention Toolkit suggests a

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six-week intervention cycle, which is standard and best practice. Campuses also reported differences in the number of intervention cycles typically provided to a student prior to a referral to special education. An appropriate intervention cycle allows sufficient time for teachers to provide a needed intervention and then to assess for progress.

Finding 8: The central office is not sufficiently supporting campuses in implementing MTSS effectively, nor is it holding them accountable for results.

In general, the role of the central office is to provide guidance, resources, and supports to campuses and then hold staff accountable for implementation. With regard to MTSS, the central office has not been effective in any of these areas. The review team identified several root causes contributing to the lack of fidelity and inconsistent implementation of MTSS in the District.

Several offices and departments coordinate efforts related to MTSS, but there is no accountability for oversight of implementation.

As described previously, an MTSS District Team was established in 2019 after the ODE audit, and is comprised of the Executive Directors of Elementary and Secondary Academics, the Directors of Elementary and Secondary Curriculum and Instruction, the Director of Special Education, the Coordinator of Student Well-being and Mental Health, the Coordinator of State and Federal Grants/CCIP, a Special Education Coordinator, and three LSSPs. While cross-departmental collaboration is essential, no single department is responsible for coordinating and leading the efforts of MTSS in the District. The MTSS Work Group meets bi-weekly to discuss MTSS, but a plan has not been developed and presented to the MTSS District Team outlining the roles and responsibilities, goals and objectives, or specific activities and timeline for completion for MTSS implementation. As a result, progress on MTSS implementation in WCSD has been slow.

There are no standard operating procedures or guidance documents to assist campus administrators and intervention teams in implementing the MTSS framework.

Standard operating procedures provide documentation of processes that should be followed to ensure they are implemented consistently and with fidelity. WCSD has not developed any procedural or guidance documentation to support campuses and intervention teams implementing MTSS. As mentioned previously, there is not a common language used throughout the district to describe the intervention teams or the tiered levels of support being provided to students. Standard operating procedures also serve as a consistent reference point for teachers and intervention teams year over year, which is particularly important in the context of high staff turnover.

Very limited training has been provided to support campuses in implementing MTSS.

Aside from the overview provided by the State Support Team and the training provided by the MTSS Work Group, there has not been any formal training on MTSS processes provided to campus administrators or intervention team members. Training is the cornerstone of any new initiative; without it, there is little chance that processes will be implemented consistently and with fidelity.

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WCSD lacks curricula for providing Tier 3 math interventions at the elementary level and Tier 2 reading and Tier 2 and Tier 3 math interventions at the secondary level.

At the elementary level, WCSD utilizes the *Fundations* curriculum for Tier 2 reading interventions and *S.P.I.R.E.* for Tier 3 reading interventions. *Bridges Intervention* is used for Tier 2 math interventions. The District does not have a curriculum for Tier 3 math interventions at the elementary level, nor does it have a curricula for Tier 2 reading or Tier 2 and Tier 3 math at the secondary level. The District has provided the *iReady* online reading and math curriculum for middle schools, which creates personalized learning paths for students. Use of this curriculum is inconsistent. This lack of available curricula is problematic because without a curriculum, teachers tend to provide accommodations or modifications of the core curricula in lieu of an intervention.

Recommendation 7: Provide campuses with adequate resources and supports to implement MTSS with fidelity.

The District recently hired four elementary MTSS Coach positions who will be assigned to the highest-need Title I elementary schools (Hawthorne, Huber Ridge, Minerva Park, and Pointview). These positions will be responsible for analyzing school-level and student-level data to look at performance trends and recommend appropriate general education intervention supports, creating coaching opportunities that support classroom-based general education supports, and administering general education intervention for students needing individual specialized support that cannot be provided in the classroom.[20] The addition of these positions is commendable and will support efforts to build capacity in the district regarding MTSS processes beginning in the 2022-23 school year.

To further support the implementation of MTSS, it is recommended that the District:

- Formulate a district-level plan to map out strategies and activities for supporting campuses in implementing MTSS with fidelity. Developed by the MTSS District Team, the plan would serve as a roadmap for identified strategies, activities, and resource requirements to ensure all schools are equipped with the resources and supports they need to implement MTSS (inclusive of RTI and PBIS). The plan would also serve as a vehicle for communicating to District leadership and other stakeholders how the District is progressing against the plan.

- Develop an MTSS handbook that would be used as the primary artifact for articulating the District's framework and approach to providing multi-tiered interventions and supports for students who are struggling academically and/or behaviorally. The handbook should clearly communicate a shared vision for MTSS, expectations for district-wide implementation, staff roles and responsibilities on the student support team, processes for setting up data systems, and guidelines for providing evidence-based interventions. The handbook can also provide links to other supporting resources and protocols.

- Facilitate professional development around the basics of MTSS. Hold campus-based sessions annually so that all administrators and staff, new and experienced, are familiar with MTSS

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[20] WCSD Elementary MTSS Coach job description.

protocols, use a common language, and embrace a culture of inclusion and wrap-around support for all students.

▪ Provide professional development to campus administrators and student support team leads on the MTSS framework, processes, and protocols (including the Intervention Toolkit). A consistent, standard process will help guard against any bias when making decisions to support students. WCSD should actively work to shift the mindset of educators from whether or not students are responding to an intervention to how well educators are responding to where students are in their learning.

▪ Support campuses in building master schedules that allow for interventions to take place, particularly at the secondary level.

▪ Provide a curriculum for Tier 2 and Tier 3 interventions for elementary math and secondary reading and math. In middle schools, set expectations for the use of *iReady* lessons and learning pathways for students needing intervention.

▪ Ensure ongoing communication with parents about their child's progress and area(s) of need. Parents are required to receive notification of the intervention plan before the intervention begins, so it is imperative that all campus leaders collaborate to ensure that parent communications are timely, relevant, and comprehensive.

MTSS/PBIS Implementation in WCSD

Ohio's strategic plan for education, *Each Child, Our Future*, explicitly recognizes the need for a positive climate in every school to support student well-being, academic achievement, and future success. In 2019, Ohio enacted House Bill 318 (the Supporting Alternatives for Fair Education (SAFE) Act), which is one of the strongest state laws in the country addressing multi-tiered behavioral supports in the interest of reducing disciplinary referrals, especially for prekindergarten through Grade 3 students. This bill strengthens requirements for school districts to implement PBIS, social-emotional learning supports, and trauma-informed practices.[21]

District implementation of PBIS is notated on the Ohio School Report Cards as "yes" or "no." The district report card measure is based on schools' self-report of one of six letter codes for PBIS implementation:

A. ***Work on PBIS has not yet begun.***

B. ***Exploration and Adoption*** – Researching PBIS, exploring readiness, and securing staff and administration that are in agreement to implement the PBIS.

C. ***Installation*** – Creating the PBIS team, completing PBIS team training, and establishing initial systems, data-decisions, policies, and practices that will be required to implement PBIS.

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[21] Referenced at: https://education.ohio.gov/Topics/Student-Supports/Ohio-PBIS.

D. ***Initial Implementation*** – Rolling out and implementing PBIS school-wide with a focus on Tier I supports.

E. ***Full Implementation*** - Implementing PBIS with all systemic components and a range of interventions (Tier I, II, and III supports)

F. ***Innovation and Sustainability*** – Routinely checking fidelity and outcomes of implementation using national assessments and revising and updating practices and systems as needed.

The implementation of PBIS involves a long-term commitment to a process of evaluation, planning, development, and renewal. According to ODE, schools typically need to anticipate a three- to eight-year commitment in order to develop the highest quality program implemented with fidelity. In 2020-21, WCSD reported that four campuses are in the Initial Implementation stage of PBIS implementation, 18 are in the Full Implementation stage, and one is in the Innovation and Sustainability stage of PBIS implementation.

Finding 9: The District lacks clearly defined Tier 2 and Tier 3 interventions for behavior.

A high percentage of staff perceive that their campus does not have clear and effective processes for providing behavior interventions. Despite most schools self-reporting that they are in the full implementation phase of PBIS, just 43.3% of staff agreed that their campus has a clear and effective process for providing behavior interventions (more than half (51.2%) of staff disagreed). Again, campus administrators had the highest rate of agreement (79.3%), while licensed special education service providers had the highest rate of disagreement (66.7%).

Figure 55. Staff Survey: My campus has a clear and effective process for providing behavior interventions.
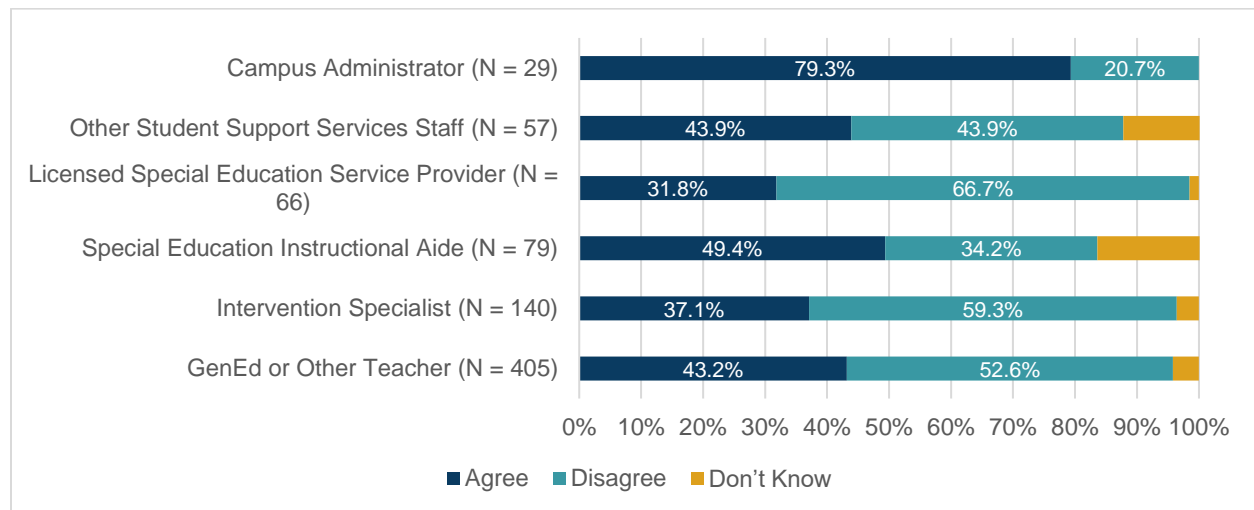
Source: Gibson Staff Survey

Staff that reports to more than one campus had the highest rate of agreement (48.3%), and staff at preschool (76%) and middle schools (56.2%) had the highest rates of disagreement.

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Figure 56. Staff Survey: My campus has a clear and effective process for providing behavior interventions.
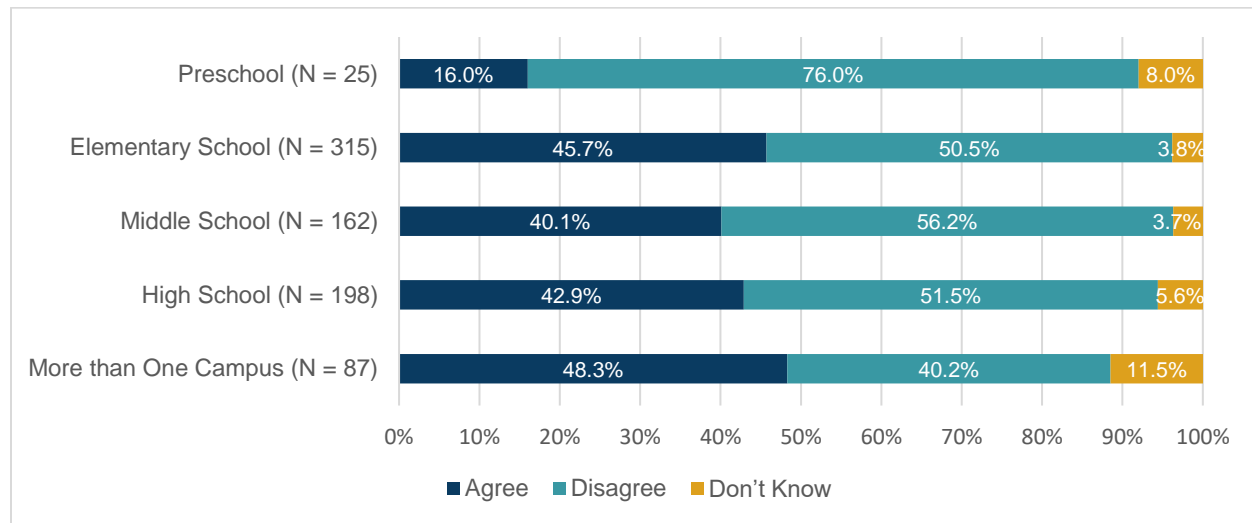
Source: Gibson Staff Survey

Tier 1 behavioral interventions are provided by the general education teacher. The Intervention Toolkit referenced previously directs teachers to shared Google folders that include documents for PBIS resources for preventative strategies that should be in every classroom; a behavior flowchart to help teachers identify behavioral strategies based on function; data collection sheets to guide teachers in collecting data to track behavior; resources for selecting basic behavior interventions; and, information for conducting a formal Functional Behavior Assessment (FBA) and Behavior Improvement Plans (BIP).

Tier 2 and Tier 3 interventions at the secondary level are typically provided by a TOSA Mental Health Specialist, an itinerant position responsible for supporting district-wide programming, projects, and initiatives addressing mental health/wellness education and intervention. In 2021-22, the district had 5 FTE TOSA Mental Health Specialist positions. Special Education Behavior Specialists are often relied upon when crisis situations arise but are not part of the tiered level of interventions. Tier 2 and Tier 3 interventions at the elementary level are not formalized, and therefore interventions tend to be reactive when crises occur, and itinerant social workers or the mental health counselors are called on to intervene. Further, 36.2% of staff that responded to the survey indicated that processes for progress monitoring student behavior are inconsistent.

During school visits, campus administrators indicated that there is not a district-wide curriculum for providing behavior interventions. There is familiarity with the *Collaborative for Academic, Social, and Emotional Learning (CASEL)* framework and trauma-informed practices among some staff members, and several curricula to address behaviors are in use across the district, such as *Zones of Regulation*, *Social Thinking*, or *Restorative Practices*, but there is no consistency in practices across the district. At the elementary level, school counselors utilize the *PATHS* curriculum. The lack of clearly defined Tier 2 and Tier 3 interventions for behavior will result in inaccurate referrals for special education evaluation.

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Recommendation 8: Design a system for delivering Tier 2 and 3 interventions for behavior at each school level.

Tier 1 intervention for behavior has begun in the district with the implementation of PBIS in all schools. It is important to train and support this phase; however, the district should identify the targeted individual student supports it intends to utilize for Tiers 2 and 3 and begin working toward providing the resources to support these interventions. Although there are tools available in some schools, these are not consistent throughout the district. It is unclear whether the use of Restorative Practices in two middle schools is a pilot, and the intention is to scale this model to other schools if it is successful. This would be a logical method for selecting materials to support Tier 2 and 3 interventions.

Finding 10: Black/African American students, both non-disabled and disabled, disproportionately receive discretionary disciplinary actions.

The 2017-18 *Indicator 4 – Disproportionate Discipline and Suspensions – District Self-Review Summary Report* stated that there is disproportionality across subgroups in the number of SWD who receive out-of-school suspensions (OSS) and that there is a disproportionate number of Black/African American students who receive disciplinary actions. This report reflected 551 suspensions, with 174 (35%) of those being SWD. The self-report included the following statement regarding suspensions of SWD: "*This data outcome is alarming.*"

In 2018-19, WCSD was required to develop a corrective action plan for *Indicator 4B (Disproportionate Discipline and Suspensions)*. The ensuing Corrective Action Plan (CAP) noted an increase in suspensions in primary and secondary for insubordination, fighting, and violating school rules, which would be addressed with professional development and the use of *PATHS* and *Panorama* curricula for teaching appropriate behaviors.

In 2019-20, there were a total of 822 suspensions. Economically disadvantaged students accounted for over half of all school suspensions; Black/African American and male students also experienced disproportionately high suspension rates. In 2020-21, there were 1,092 suspensions, of which 358 (32.7%) were experienced by SWD. The data also suggests that students who are economically disadvantaged are almost twice as likely to be suspended than any other subgroup. Suspensions in 2021-22 were lower than in prior years, primarily due to the COVID-19 pandemic.

In 2017-18 and 2018-19, Black/African American students accounted for nearly half of all students who experienced restraint or seclusion. In 2019-20 and 2020-21, Black/African American students accounted for one-third of all students who experienced restraint or seclusion.

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Table 18. SWD Student Restraints and Seclusions, by Race/Ethnicity, 2017-18 to 2020-21

SWD Race/Ethnicity	2017-18	2018-19	2019-20	2020-21
Black or African American	20	20	9	1
Two or More Races	8	7	7	1
Hispanic/Latino	4	1	1	0
White	16	15	10	1
Total SWD	**48**	**43**	**27**	**3**

Source: WCSD Restraints and Seclusions (DR #41)

Table 19 below shows that the total number of students restrained or placed in an exclusionary setting over the past four years decreased, a trend that can be attributed to the remote learning that occurred during the COVID-19 pandemic. Nearly all students who experienced restraint or seclusion had a BIP, but relatively few had an FBA.

Table 19. WCSD Student Restraints and Seclusions, 2017-18 to 2020-21

Metric	2017-18	2018-19	2019-20	2020-21
# Trained Staff	237	208	252	231
# Students Restrained/Secluded	48	43	27	3
– # SWD Restrained/Secluded	48	41	27	3
– # GenEd Students Restrained/Secluded	0	2	0	0
# Students with FBA	7	13	3	1
# Students with BIP	48	42	8	2
# Students Suspended	11	9	14	2
# Students Expelled	0	0	0	0
# Student Injuries	0	0	0	0
# Staff Injuries	7	7	0	0

Source: WCSD Restraints and Seclusions (DR #41)

Three elementary schools account for the majority of student restraints and seclusions: Huber, McVay, and Whittier. These three campuses also house the Emotional Disturbance SLC.

Table 20. SWD Student Restraints and Seclusions, by Campus, 2017-18 to 2020-21

Campus	2017-18	2018-19	2019-20	2020-21
Elementary Schools Total	**42**	**37**	**24**	**2**
Alcott	1	0	0	0
Cherrington	2	2	0	0

Campus	2017-18	2018-19	2019-20	2020-21
Hawthorne	1	0	0	0
Huber	14	13	8	1
McVay	8	12	8	0
Pointview	0	1	0	0
Robert Frost	1	3	0	0
Whittier	12	4	6	1
Wilder	3	2	2	0
Middle Schools Total	**6**	**5**	**3**	**1**
Blendon	0	1	0	0
Genoa	0	1	0	0
Heritage	5	2	2	0
Walnut	1	1	1	1
High Schools Total	**0**	**1**	**0**	**0**
Westerville Central High School	0	1	0	0
Total SWD	**48**	**43**	**27**	**3**

Source: WCSD Restraints and Seclusions (DR #41)

Note: Schools not listed did not report any student restraints or seclusions during this time period.

On the staff survey, just 43.8% of staff indicated that campus administrators at their school follow a consistent process for administering discretionary disciplinary referrals, while 39% of staff disagreed with this statement. The highest rates of disagreement are at middle and high schools, where the majority of disciplinary actions take place.

Figure 57. Staff Survey: Campus administrators at my school follow a consistent process for administering discretionary disciplinary referrals.
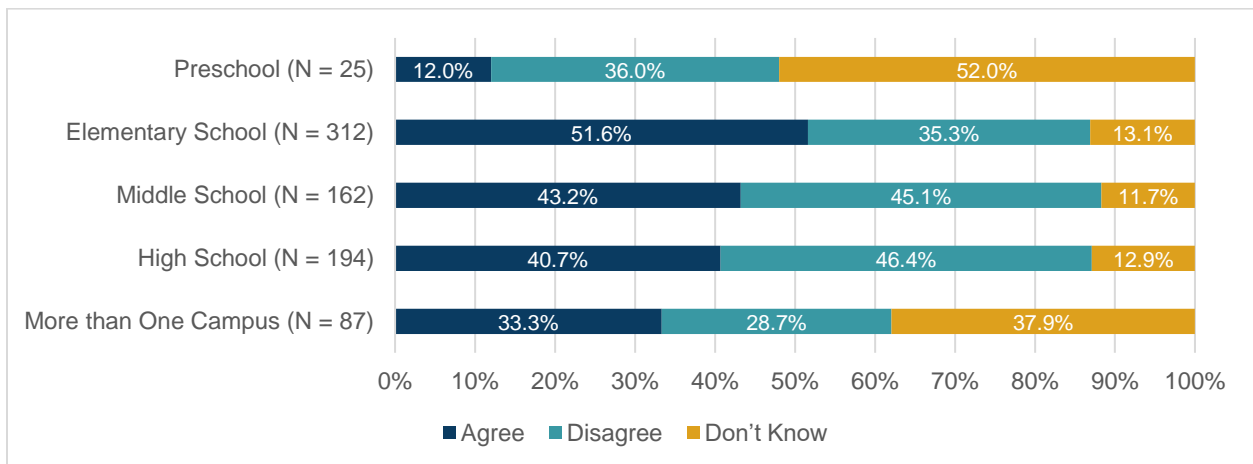
Source: Gibson Staff Survey

Recommendation 9: Implement a two-pronged diversity and cultural awareness training program and classroom management strategies for all teachers and campus administrators.

Cultural awareness training will enable staff to learn about and value different perspectives and backgrounds and develop empathy and understanding when students from all cultural groups demonstrate behaviors that seem inappropriate. The training should be required so that all staff uses common language and practices around student behavior for consistency. It is best to engage in training of this nature in groups such as PLCs to encourage dialogue and common understanding.

Training in basic classroom management practices for all teachers will provide the consistency students with challenging behaviors need. Additionally, general education teachers will be empowered with proven skills to build their confidence to effectively interact with all populations, including SWD from all racial groups. These include effective rules and procedures, appropriate disciplinary interventions, productive teacher-student relationships, and positive mental sets. Administrators will need to monitor and be accountable for ensuring the implementation of these best practice classroom management practices in all classrooms.

Individualized Education Program (IEP)

The Individualized Education Program (IEP) is a multidisciplinary, team-developed plan required for every child receiving special education services under Part B of the Individuals with Disabilities Education Act; it is an "educational roadmap" for students with disabilities. An audit of a sample of IEPs yielded the following findings (more detail on the IEP audit is included in *Appendix B – IEP File Review*). Overall, the review team found that IEPs were well-written and compliant with all federal requirements. However, WCSD's approach to documenting specially designed instruction (SDI) in student IEPs is inconsistent with best practice.

Commendation 3: A high percentage of staff perceive that IEP teams are collaborative and consistently use data to make decisions regarding student goals, services, and LRE.

Overall, a high percentage of staff that responded to the staff survey agreed that IEP teams consistently use data to make decisions regarding student placement, the schedule of services, and the development of IEP goals (78%) and are thoughtful and collaborative in deciding how much SWD should be included in the general education classroom and the level of supports they need (73.5%). More than 83.5% of staff agreed that SWD are served in settings with their non-disabled peers to the greatest extent possible.

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Figure 58. Staff Survey: IEP Team
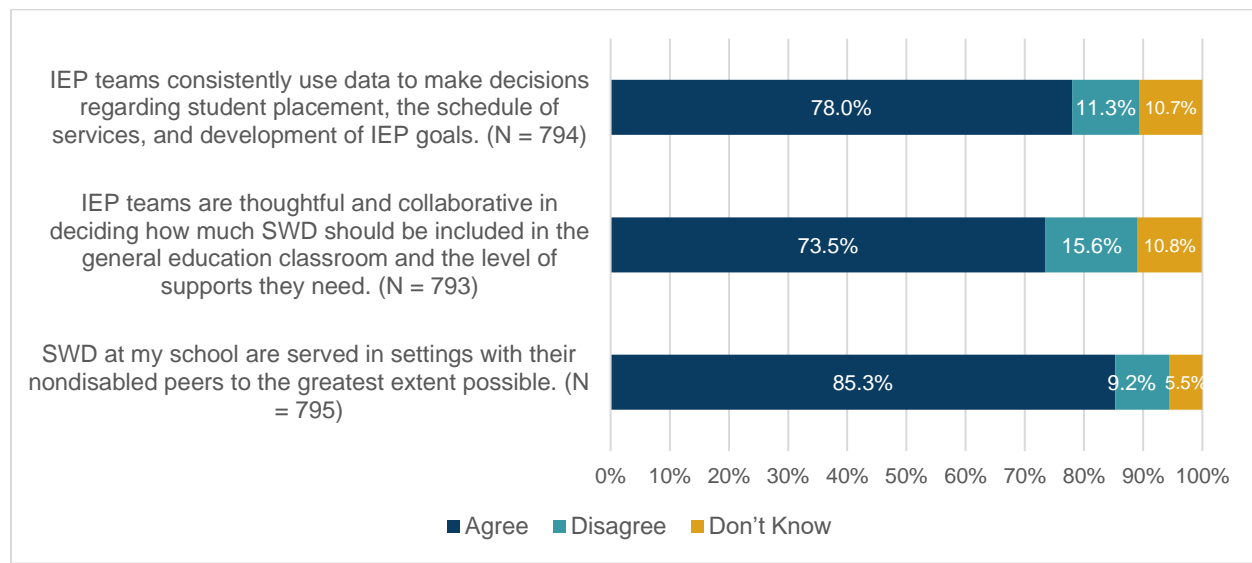
Source: Gibson Staff Survey

Commendation 4: Program Coordinators facilitate transition meetings as SWD matriculate school levels.

Transition is a natural part of any educational program and all students are expected to adjust to changes in teachers, classmates, buildings, schedules, and routines as they matriculate from one school level to the next. This process can be especially challenging for SWD. To help ensure a smooth transition, Special Education coordinators facilitate transition meetings each Spring when a SWD matriculates from Grade 5 to Grade 6 and from Grade 8 to Grade 9. These IEP meetings include the intervention specialist from the sending school and an intervention specialist from the receiving school. This allows an opportunity to share information about the student with the receiving building and to ensure the student schedule is set up to match the IEP services. This process is described well in the Department's Special Education manual, which includes specific steps and tools for teachers to use to facilitate the transition meeting.

Commendation 5: The percentage of SWD in more inclusive settings has increased.

IDEA guarantees that a child with a disability will receive a free appropriate public education in the least restrictive environment (LRE) appropriate. This principle reflects IDEA's strong preference for educating students with disabilities in general education classes with access to the general education curriculum. Placement in the general education classroom is the first placement option the IEP team must consider.

When considering placement in the general education classroom, the IEP team is required to explore the range of supplementary aids and services that are needed to ensure that the student can receive a satisfactory education in the general education classroom. If the IEP team determines that the student can be appropriately educated in the general education classroom using modifications/supplementary aids and services, this is the LRE for that particular student. However, the IEP team may determine that the student cannot be educated satisfactorily in the general classroom, even with the provision of modifications and supplementary aids and services. The team must then consider other placements outside of the general classroom in order to provide FAPE for the child. The range of such placements that each school system

is required to have available is commonly referred to as the "continuum of alternative placements." Thus, like all other components of a student's special education, the LRE must be determined for each student based upon that child's individual needs.[22]

Table 21 compares the percentage of SWD in each instructional setting in 2017-18 and 2021-22. For school-aged children ages 6 to 21, WCSD has demonstrated a pattern of serving a higher percentage of students in more inclusive settings over the past five years (students served outside of the general education classroom less than 21% of the day increased 5.8 percentage points over the past five years).

Table 21. SWD Representation by Instructional Setting, 2017-18 and 2021-22

Instructional Setting		2017-18	2020-22
Children Ages 6 - 21			
IE13	Special Education outside the regular class less than 21% of the day	53.4%	59.3%
IE14	Special education outside the regular class at least 21% of the day and no more than 60% of the day	21.5%	17.1%
IE15	Special education outside the regular class more than 60% of the day	16.1%	12.4%
IE16	Public Separate School	1.3%	1.0%
IE17	Private Separate School	0.1%	0.2%
IE18	Public Residential Facility	0.0%	0.1%
IE20	Homebound/Hospital	0.1%	0.0%
IE39	A student with a disability who was enrolled by his/her parent(s) or guardian(s) in a regular parochial or other state-approved nonpublic or private school and whose basic education is paid for through private resources.	0.6%	0.3%
Children Ages 3 - 5			
IE51	Services Regular Early Childhood Program (More Than 10 Hours)	5.6%	6.2%
IE53	Services Regular Early Childhood Program (Less Than 10 Hours)	0.0%	0.0%
IE55	Other Location Regular Early Childhood Program (More Than 10 Hours)	0.0%	0.4%
IE56	Other Location Regular Early Childhood Program (Less Than 10 Hours)	0.0%	0.1%
IE60	Preschool Special Education Program - Separate Class	0.3%	1.3%
IE62	Preschool Special Education Program - Separate School	0.1%	0.0%

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[22] https://www.sst6.org/LeastRestrictiveEnvironmentLRE1.aspx.

Instructional Setting		2017-18	2020-22
IE70	Preschool at Home	0.1%	0.2%
IE72	Preschool Service Provider Location	5.6%	6.2%
	Total SWD	**2,236**	**2,222**

Source: WCSD Student Enrollment Data (DR #33/34 Revised)

Finding 11: Total minutes of service a student receives is not included in their IEP, making it difficult to accurately determine LRE.

It is common practice in WCSD for IEPs to reflect in *Section 7: Description of Specially Designed Services* only the number of minutes of specially designed instruction (SDI) dedicated to working on specific IEP goals. An example from the IEP sample is a student who was Cognitively Disabled and has an LRE of IE15 (outside the regular class more than 60% of the day). The only minutes of service shown in the IEP were 420 minutes per month utilized to work on IEP goals. Based on the student's LRE, he should be receiving special education services more than 4,000 minutes per month, yet who provides the services and for what period of time they are provided is not given.

Although this practice complies with guidelines from the ODE, without the inclusion of total minutes of service students receive special education services, it is unclear how WCSD can accurately determine students' LRE or calculate the workloads of intervention specialists and related service providers. An accurate LRE can only be determined if the number of minutes students receive special education services in general and special education classes are known.

Recommendation 10: Include in the IEP the total number of minutes a student is to receive students receive instruction outside the general education classroom as well as the total number of minutes students receive support within the general education classroom.

It will be important for the District to begin recognizing all minutes of service SWD receives, not just those related to specific student goals. Consider adding the following information to indicate all supports and service minutes provided to students: Total Minutes of Service, General Education Modified, General Education with Support, and Special Education. Understanding the total minutes of service required for all SWD in a school enables campus administrators to assign staff as needed and also provides the data district administrators need to properly staff schools.

Finding 12: IEPs are inappropriately specifying instructional models (e.g., Team Teach), and some students in Team Teach classes are being overserviced.

All of the student files reviewed contained varying amounts of direct and indirect support to be provided to students. All files contained accommodations that were specific and included multiple options. In the provision of the SDI section of the IEP, Team Teach was indicated as a location for services to be delivered on three of the student IEPs that were reviewed. Best practice is to identify the amount of time students need support in a general education classroom but not to indicate the instructional model being used. If a team-teaching pair is disrupted due to a teacher retiring, moving, or some other reason, the district is still required to implement the IEP as written and provide team teaching, or the IEP team must amend the IEP.

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This issue is also problematic when students move from one school that offers team-taught classes to another school that does not.

In addition, three students who are receiving SDI in Team Teach classes are also being pulled to a resource class for a portion of the day to receive SDI on the same goals that should be addressed in the Team Teach class. This approach to delivering SDI can lead to overservicing, which can inflate costs for special education services beyond what is necessary.

The following table gives details for the three students with an LRE of IE13 (Special Education outside the regular class less than 21% of the day) who are in Team Teach classrooms. The table lists their number of Team Teach classes, the minutes of service from a special education teacher that the corresponding number of classes represents (per month), the number of service minutes indicated in *Section 7* of the IEP for Team Teach, and additional services the student receives with no service minutes recognized in the IEP. In the table below, Student A has support in the general education classroom for 1,200 more minutes than called for in the IEP and additional minutes of service in Supplemental and Academic Support classes. Likewise, students B and C also receive many more minutes of support than their IEPs call for.

Table 22. Examples From Student IEPs to Illustrate Overservicing

Student	# of TT Classes	Minutes/Month in TT	SDI in TT	Additional Services (i.e., no minutes of service indicated in the IEP)
A	2	1,800	160	Supplemental every other day & Academic Support
B	1	900	80	Resource
C	2	1,800	120	Supplemental every other day

Source: Gibson IEP Audit, *IEP Anywhere*

Recommendation 11: The practice of referencing Team Teach in IEPs should be replaced with "general education with support."

Best practice is to specify where instruction will take place and the amount of support the student will receive but not the instructional model that will be utilized. As such, the practice of referencing TT in IEPs should be replaced with "general education with support." Using the term "general education with support" gives flexibility to the support model the student will receive but still ensures they will receive the number of minutes needed. The minutes of support need not be the entire period and do not always need to be provided by an Intervention Specialist. Teachers should determine when individual students need support, such as during the lesson's introduction or individual practice, and what type of support is needed. In this way, the special education support can be scheduled for the amount of time determined, but additional time can be provided if staff are available.

Finding 13: Annual goals for chronic problem behaviors that impede student's learning or that of others are developed for multiple years or not at all without the benefit of in-depth analysis of behaviors through an FBA and the subsequent drafting of a BIP.

There were two students in the IEP sample population who had four IEPs in SameGoal, representing 12 years of school, that addressed similar inappropriate behaviors unaddressed by an FBA or a BIP. Three additional students had three IEPs, representing nine years of school, that addressed similar inappropriate behavior without the benefit of an FBA or BIP. When a student's behavior continues to impede their own learning or that of others even after implementation of behavior interventions, a functional behavioral assessment (FBA) should be conducted.

An FBA is a part of the positive behavioral support (PBS) mandated by IDEIA. An FBA is a process that describes a student's disruptive behaviors, looks for the reasons behind the behaviors, and offers interventions that teach new behaviors to replace the undesired ones. A team, which can include counselors, behavior specialists, teachers, parents, paraprofessionals, or others knowledgeable about the student, forms a hypothesis about possible deficits and causes for the behavior and tests this by creating variations in the learning requirements and environment to see if and how the student responds. If the intervention is ineffective, the team may create a behavior intervention plan (BIP).

The BIP targets one to three of a student's undesirable behaviors with interventions linked to the behavior's functions. Each intervention specifically addresses a measurable, clearly stated, and targeted behavior. A BIP can include prevention strategies that stop the behavior before it begins and replacement behaviors, which achieve the same function as the disruptive behavior without causing disruption. The environment is considered, and the FBA/BIP team may determine that a change in a student's schedule or classroom arrangement is called for. In addition, the BIP provides a plan for responding to the old behavior that is being replaced and promoting the new behavior.

PBIS is the only approach required for addressing behavior referenced in the IDEA. IDEA notes that educating students with disabilities can be more effective by using whole-school supports, scientifically-researched reading programs, positive behavioral interventions and supports, and early intervention. PBIS implementation is ongoing in WCSD, but as Tier 3 interventions are implemented, they should include the provision of FBAs and BIPs when needed. Although BIPs are not required for SWD unless a change of placement of ten days or more is made, they are a valuable and recommended tool to address behaviors that impede a student's learning or the learning of others. Students who consistently misbehave in school often fall behind academically and struggle to learn. A well-written BIP based on the results of a properly conducted FBA can help a child having repeated behavior problems in the classroom setting. The aim is to teach and reward good behavior and prevent or stop negative behaviors. The plan's focus should be teaching positive behaviors to replace the targeted negative behaviors when possible. The ability of children to interact effectively with peers, teachers, and families is crucial to their social-behavioral development and adjustment at school. Further, poor social-behavioral skills correlate highly with children's low academic achievement, especially their reading ability. Children with antisocial behavior patterns are at early risk of poor adjustment to school.

There were nine students in the IEP sample population whose IEPs stated that their behavior impeded their learning or the learning of others, but only one student had an FBA, and two had a BIP. The other students had an IEP goal to address inappropriate behaviors or no goals, as shown in Table 23 below.

Table 23. Students Identified With Behaviors that Impede Learning by Interventions Provided

Student		Goal Type			Intervention	
Student	Disability	Adaptive Behavior	Self-Regulation	Work Output	FBA	BIP
A	AU	✓	-	-	-	-
B	AU	✓	-	-	-	-
C	AU	-	-	-	-	-
D	CD	-	✓	-	-	-
E	ED	-	✓	-	✓	-
F	ED	-	✓	✓	-	✓
G	MD	✓	-	✓	-	✓
H	OHI Minor	-	-	✓	-	-
I	OHI Minor	-	-	-	-	-

Source: Gibson IEP Audit, *IEP Anywhere*

Recommendation 12: Train staff to develop behavior goals for any behavior that impedes a student's learning; if goals are not mastered after a reasonable amount of time, amend the IEP to include a BIP based on an FBA.

Goals to extinguish any undesirable behavior should be developed for all SWD. If the behaviors persist, IEP teams need to consider conducting an FBA to analyze the behaviors in order to understand them and to address them appropriately. Chronic behavior problems are difficult to replace with more appropriate behaviors which is why a plan based on an FBA is recommended.

Having a BIP in place allows everyone to be on the same page when addressing a child's behavioral issues. It also enables behavior specialists, counselors, teachers, family members, and anyone involved to follow the same protocol for dealing with the child's behavior. Providing protocols to teachers to guide them as they address students' challenging behaviors in their classrooms first with behavior goals, then if inappropriate behaviors persist, with a properly conducted FBA and implementation of a BIP will bring more consistency to the process. Training on how to follow the protocols and monitoring the implementation of the protocols will also be important to ensure the successful application of BIPs.

Commendation 6: The District has implemented process changes to better determine when a student is most appropriately assessed using an alternate assessment.

The percentage of students taking the Alternate Assessment for Students with Significant Cognitive Disabilities (AASCD) exceeds the limit imposed by ESSA. All students in tested grade levels and courses are expected to participate in the State of Ohio assessment program unless specifically exempted by state or federal law or by Board of Education regulations. Students with disabilities may take assessments with or without accommodations or be assessed through alternate or alternative assessments. The Alternate Assessment for Students with Significant Cognitive Disabilities (AASCD) is an alternate assessment based

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on alternate achievement standards and is specifically designed to evaluate the achievement of students with significant cognitive disabilities. The AASCD is available to students in grades 3 through 11 who are working on academic standards that have been reduced in complexity and depth. Only students with significant cognitive disabilities who are eligible under IDEA and who meet the AASCD guidelines for participation may be assessed through the AASCD. As such, the Every Student Succeeds Act (ESSA) requires districts to submit a justification annually when it anticipates testing more than 1% of students using the AASCD in a given subject.

In an effort to reduce the percentage of students taking the AASCD statewide, ODE developed an Alternate Assessment Participation Decision-Making Tool and requires that all IEP teams complete the tool prior to any student participating in the AASCD. The Tool is divided into four parts, and IEP teams must work their way through each part to determine if the student meets the criteria. If the student does not meet the eligibility criteria for each part, then the student may not take the AASCD.[23]

In 2020-21, WCSD tested 1.5% of students using the AASCD, exceeding this requirement. WCSD also had the highest percentage of students testing with the AASCD than all of the comparator districts (Figure 59). The review team was not provided with documentation for the ESSA-required justification.

Figure 59. Percentage of SWD Taking the AASCD, 2020-21
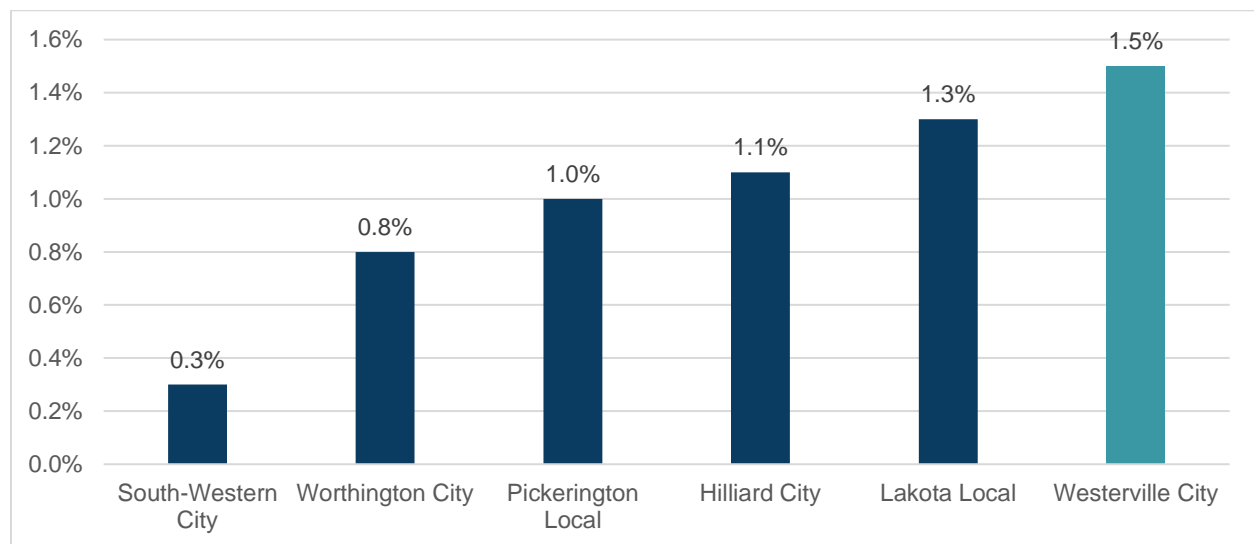
Source: ODE School Report Card, 2020-21

WCSD has not developed a corrective action plan to address this issue, as one was not required by ODE. However, management reports that the Department has reviewed IEP team protocols to determine what could be done differently. This included reviewing as a team student IEPs, Evaluation Team Reports (ETR), and other data that led to the testing recommendation by the IEP team. Additionally, the Department provided training to all impacted staff on using the State's new Alternate Assessment Participation Decision-Making Tool and reports that the process has significantly altered conversations surrounding testing within IEP teams and has already resulted in a reduction in the number of students participating in the AASCD.

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[23] Referenced at: https://education.ohio.gov/getattachment/Topics/Testing/Ohios-Alternate-Assessment-for-Students-with-Sign/AASCDDecisionmakingTool_Final_Accessible-pdf-aspx.pdf.aspx?lang=en-US.

Moreover, the process has led to wider conversations regarding alternative approaches to supporting students' academic achievement. Continued monitoring and support of IEP teams in using the State's Alternate Assessment Participation Decision-Making Tool will help to ensure that the District is compliant in this area.

Section 504

Section 504 of the Rehabilitation Act of 1973 is designed to protect the rights of individuals with disabilities in programs and services that receive Federal financial assistance. In the educational setting, Section 504 requires recipients to provide qualified SWD appropriate educational support designed to meet the individual needs of such students to the same extent as the needs of students without disabilities. Qualified students are defined as those with a physical or mental impairment that substantially limits one or more major life activities. If the student's educational team (including parent/guardian) determines through a Section 504 evaluation that the student meets the eligibility requirements, the team will then determine whether or not the qualified student requires accommodations and/or other supports to access the curriculum to the same extent as non-disabled peers. If the student does require support, the educational team develops a Section 504 plan with accommodations. Accommodations may provide physical, instructional, or social/emotional support.

Finding 14: The Section 504 identification practices are not well-defined, particularly at the secondary level.

As described in *Chapter 3 – Program Organization and Management*, oversight of the District's Section 504 program is diffused across several organizational units, resulting in a general lack of accountability for program outcomes. At the campus level, 504 teams are comprised of the parent(s)/guardian, the school counselor, the campus administrator, a general education teacher, and any other related service providers needed (e.g., nurse, social worker, school psychologist). School counselors serve as the case manager for the Section 504 students at both the elementary and secondary levels. The general responsibilities of the Section 504 case manager include managing the referral process for the identification of Section 504 students, reviewing and monitoring the Section 504 plan and the effectiveness of accommodations, ensuring a Manifestation Determination meeting is held (when needed), ensuring periodical completion of periodic reevaluations, and facilitating the transfer/matriculation process. Although the assignment of Section 504 case manager responsibilities to school counselors is a common practice in many school districts (including some of the comparator districts), this practice does not appear to be working well at the secondary level in WCSD:

- Case management for Section 504 is not referenced in the job description for school counselors, nor is it referenced in any of the job descriptions assessed as part of this review. Not referencing this major responsibility in any job description inhibits accountability for Section 504. Anecdotal feedback provided by most secondary school counselors during group interviews suggests that many perceive Section 504 case management as an "added and extra responsibility" for which they feel "unprepared and unqualified" to undertake. Counselors at the secondary campuses expressed that they are particularly stretched, as they have many other responsibilities that include student scheduling, transcripts, and supporting students' social and emotional needs.

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- School counselors also shared that they often feel pressured by parents to qualify some students for Section 504. As shown in Figures 34 and 35 above, the current demographic profile of Section 504 students is not representative of the non-SWD/Section 504 student population, with White students overrepresented by 21.2 percentage points and economically disadvantaged and LEP students underrepresented by 12.1 and 9.7 percentage points, respectively. These trends in student data suggest an inconsistent application of decision rules.

- The review team had the opportunity to review several 504 plans in *IEP Anywhere* and found that many accommodations for some students appear to be good Tier 1 instructional practice rather than an appropriate accommodation needed as part of a Section 504 plan. A few examples of Tier 1 practices that are included in 504 plans as accommodations are listed below:

  – Checklists for success (morning start and end of the day)

  – Preferential seating toward instructor/learning

  – Prompting/cueing to slow down for quality work

  – Writing organizers for assignments

  – Chunk assignments

  – Intermittent feedback on chunked assignments

  – Redirection, as necessary

Recommendation 13: ExamineSection 504 case management responsibility at the secondary level.

It is also a common practice in many districts for assistant principals to serve as the Section 504 case manager for students on their campus. In fact, three of the comparator districts reported that Section 504 case manager responsibilities belong to either a school counselor or to a campus administrator. The assistant principalship is the entry-level to educational administration and the gateway to the principalship. Typically, the responsibilities of assistant principals revolve around student conflict, staff relations, and facilities management, therefore minimalizing the opportunities they have to be involved in the teaching and learning process. The readiness of assistant principals to assume the principalship depends on their experiences in their roles. By assuming the role of Section 504 case manager, WCSD would provide opportunities for assistant principals at the secondary level to know and understand the instructional practices in their respective schools and develop the skills they will need as instructional leaders in the principalship. They are also well-positioned to serve as the parent liaison. To ensure success, WCSD should provide training to assistant principals to ensure they are knowledgeable about the Section 504 regulations, eligibility requirements, and provision of services. Job descriptions should also be updated to reflect assigned responsibilities (for both school counselors and assistant principals).

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Chapter 5 – Program Design and Implementation

This Chapter provides an assessment of the District's continuum of services for students with disabilities (SWD), instructional practices, professional development opportunities available to staff who work with SWD, either directly or indirectly, and family engagement and communications. It is organized into the following sections:

- Survey Context

- Curriculum and Instruction

- Specialized Learning Classrooms (SLCs)

- Professional Development

- Family Engagement and Support

Survey Context

Overall, 62.2% of staff that responded to the survey agreed that the District is meeting the academic needs of SWD, while 29.2% of staff did not. Campus administrators (89.7%) and intervention specialists (69.6%) had the highest rate of agreement, while instructional aides (38.5%) and licensed special education service providers (34.8%) had the highest rates of disagreement. The rate of agreement was highest amongst staff at elementary schools (67%), and the rate of disagreement was highest amongst staff at middle schools (35.8%).

Figure 60. Staff Survey: The District is Meeting the Academic Needs of SWD

Source: Gibson Staff Survey

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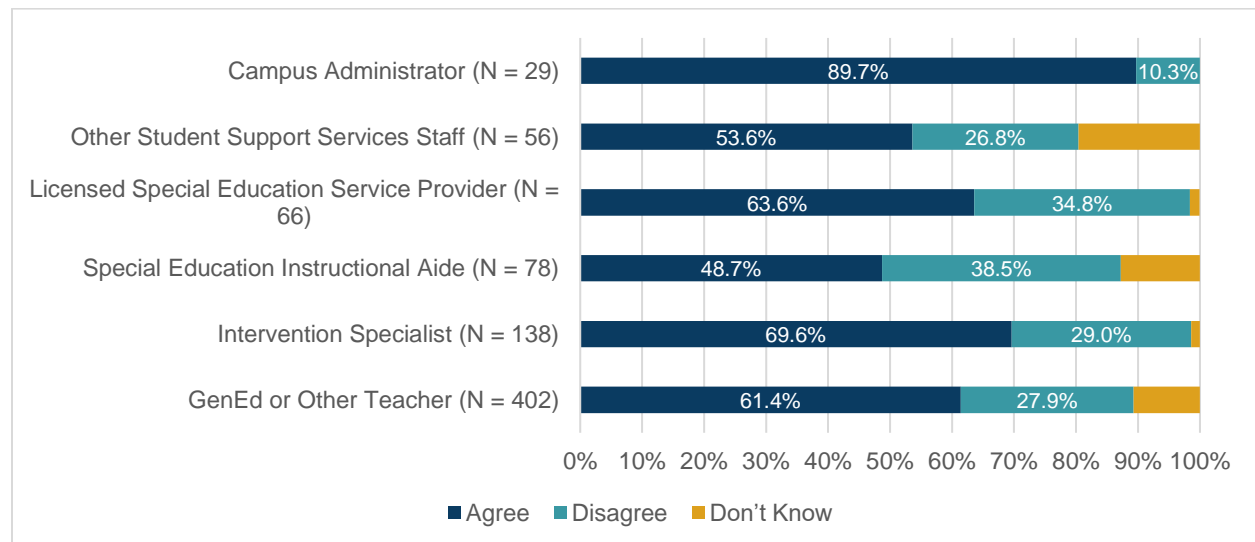
Rates of agreement were much lower when asked whether WCSD is meeting the social and emotional needs of SWD. Campus administrators had the highest agreement rate at just 69%, while intervention specialists (50.7%) and licensed special education service providers (48.5%) had the highest disagreement rates.

Figure 61. Staff Survey: The District is Meeting the Social and Emotional Needs of SW
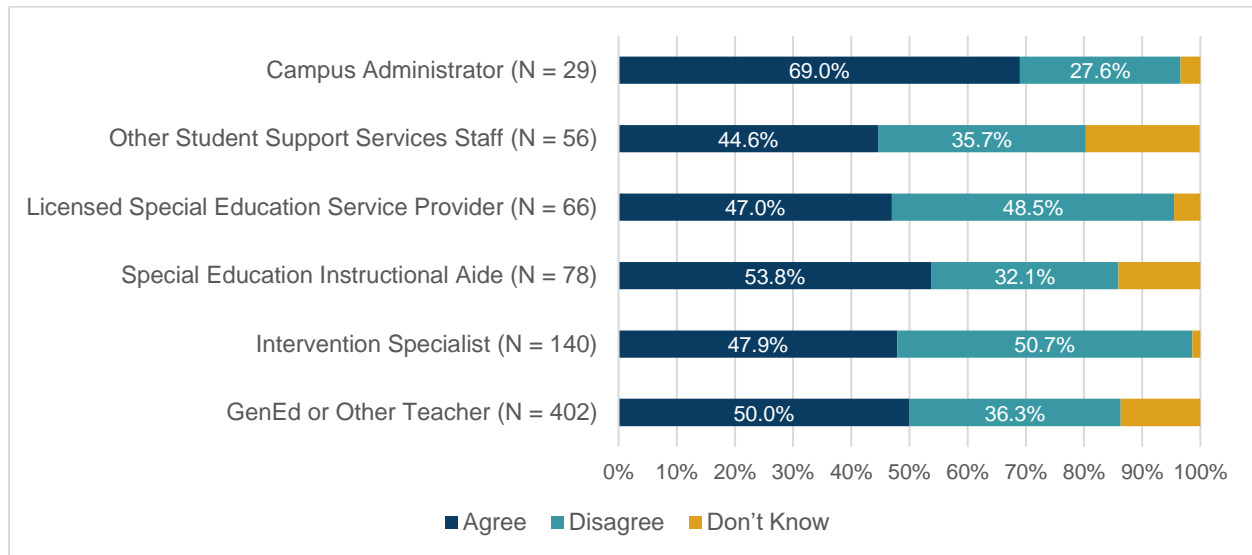
Source: Gibson Staff Survey

Approximately half (or less than) of all staff that responded to the survey agreed that the District is meeting the academic, social, and emotional needs of SWD who are also economically disadvantaged (51.7%), bilingual (39.6%) or gifted (41.3%), or students who have a Section 504 Plan (50.8%).

Figure 62. Staff Survey: The District is Meeting the Academic, Social, and Emotional Needs of Students Who Are:

Source: Gibson Staff Survey

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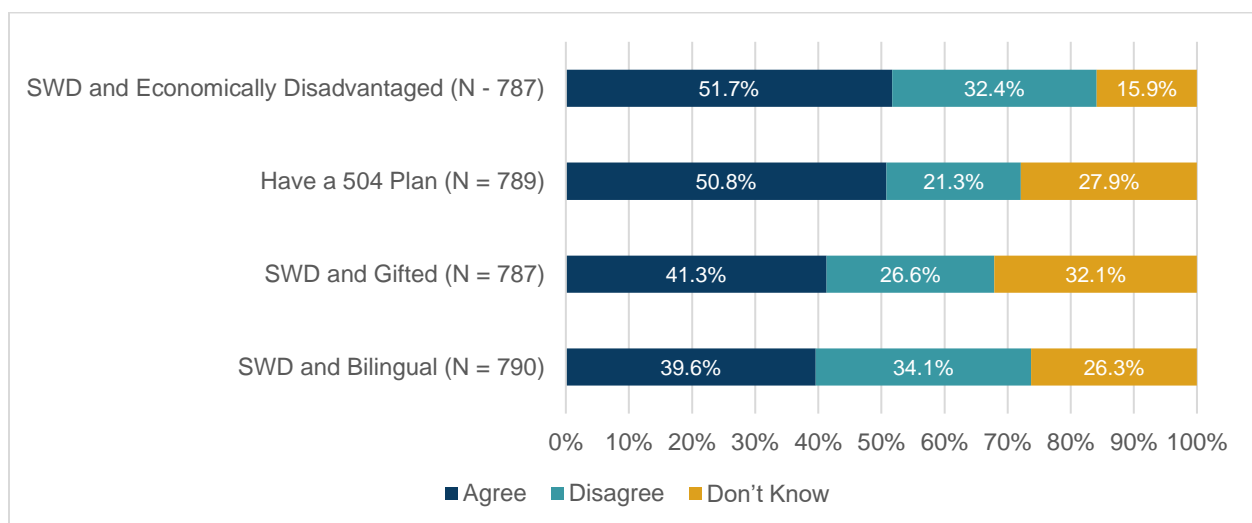
Curriculum and Instruction

Curriculum, instruction, and assessment are the foundational elements of a district's instructional infrastructure. Without a well-developed and strongly supported curriculum, instruction, and assessment strategy, principals and teachers will find it challenging, if not impossible, to achieve high academic outcomes for their students.

Commendation 7: WCSD has shown a commitment to improving students' social-emotional health by investing in the PATHS curriculum at the elementary level and Naviance and Panorama at the secondary level.

All students' social and emotional needs have increased significantly due to Covid-related concerns (e.g., family finances, isolation, fear). Because young children, in particular, are susceptible to unknowns, the District needs to provide a curriculum to meet the unique SEL needs of elementary students, including SWDs. It is typical for special education to have an SEL curriculum but not general education. By purchasing curricula for *all* students, WCSD provides the tools to address the growing needs exacerbated by the Covid-19 pandemic and remote learning.

Finding 15: Unit and/or lesson planning is not a systemic practice in WCSD, particularly for intervention specialists.

A lesson plan is a step-by-step guide that outlines the teacher's objectives for what students will accomplish during the course of the lesson and how they will learn it. Creating a lesson plan involves setting goals, developing activities, and determining what resources will be used. A unit plan consists of concepts and learning goals that are taught over a period of time; a unit of instruction can include several lessons. Unit planning provides a scaffold for weekly lesson planning and is a best practice for planning instruction.

Feedback provided by both general education teachers and intervention specialists during group interviews suggests that the practice of developing unit and/or lesson plans is at the classroom teacher's discretion and that there is not a district-wide expectation that they be done. Nearly 80% of general education teachers that responded to the staff survey indicated that they consistently plan lessons to meet a variety of student learning needs, while 62.9% of intervention specialists indicated that they do so. Additionally, staff shared during focus groups that although there are Board-adopted programs and materials, many teachers do not use them.

The WEA master agreement does not make any specific reference to unit plans, and the only reference to lesson plans are in *Chapter 17 Unpaid Leave (17.4 Short Term Leave)*, which requires that a qualified substitute and "adequate lesson plans" be secured prior to the Board granting short-term leave to a unit member (i.e., teacher). *Chapter 8 – Involvement in Curriculum Studies (8.4.1 Academic Freedom) states, "The primary responsibility for instructional design is with the classroom teacher until or unless there is a concern being addressed through the evaluation process."* Staff expressed that the Academic Freedom clause in the WEA master agreement prohibits the mandate for the development of unit/lesson plans.

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Recommendation 14: Encourage and support the routine development of unit and lesson plans to support improved instructional practices and higher student achievement levels.

Teachers should be developing unit lesson plans collaboratively within their professional learning communities (PLCs). Principals can now schedule grade level or content area PLCs for the 2022-23 school year to support this collaboration. Utilizing PLCs to analyze student-level data and develop unit/lesson plans based on the data will foster the use of common district-approved materials as teachers identify student outcomes based on the same materials. John Hattie[24] has found that collective teacher efficacy (CTE) has a larger effect on student learning than any other factor, as shown in Figure 63. He defines CTE as a staff's shared belief that through their collective action, staff can positively influence student outcomes, including those who are disengaged or disadvantaged.

Figure 63. Factors Influencing Student Achievement (John Hattie)

Influence	Effect Size
Collective Teacher Efficacy	1.57
Prior achievement	0.65
Socioeconomic status	0.52
Home environment	0.52
Parental involvement	0.49
Motivation	0.48
Concentration/persistence/engagement	0.48
Homework	0.29
Note: Effect sizes are based on Cohen's d. The average effect size is d=0.40. This average summarizes the typical effect of all possible influences on education.	

Source: John Hattie

WCSD has provided professional learning in *Understanding by Design (UbD)* which should provide the framework for unit lesson planning. A common template for lesson planning should be developed around UbD's "backward design" principles of *what* the student would have learned to master the concept (Desired Results) through independent inquiry (Essential Questions), as well as *how* they learned (Understandings).[25] A common lesson plan template will provide administrators with context when conducting classroom walkthroughs and learning rounds.

Lesson plans should always be based on district-approved curriculum. This is important because without a "guaranteed, viable curriculum" that is consistent throughout the district, there will be learning gaps as students move from school to school. Research by Robert Marzano found that providing a guaranteed, viable curriculum is the most important initiative a school or district can engage in to raise student

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[24] Professor John Hattie is a researcher in education. His research interests include performance indicators, models of measurement and evaluation of teaching and learning. John Hattie is widely known for his two books Visible Learning and Visible Learning for teachers.

[25] *The Power of Collective Efficacy*, Jennie Donohoo, John Hattie, and Rachel Eells, Education Leadership, March 2018, https://educacion.udd.cl/files/2021/01/The-Power-of-Collective-Efficacy_Hattie.pdf.

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achievement.[26] It involves creating a horizontal sequence of what needs to be learned across individual grade levels or courses as well as a vertical sequence from grade level to grade level or course to course.

Finding 16: The Team Teach instructional model is not implemented consistently across the District, resulting in inefficient staffing practices and instructional delivery that is not highly leveraged.

Co-teach (commonly referred to in WCSD as "Team Teach") is a research-based instructional service delivery model where certified general education and special education teachers work together to meet the needs of all students in the general education classroom. Both teachers share responsibility for lesson planning, delivery of instruction, and progress monitoring. A co-teach instructional model is costly to implement because it requires two teachers in a classroom instead of one. However, if implemented with fidelity, supporters of this instructional model purport that it can be effective in improving overall student performance because it draws on the strengths of the general education teacher, who has expertise in the district's curriculum, standards, and pacing, as well as the strengths of the special education teacher, who has expertise in identifying the unique learning needs of individual students and in enhancing curriculum and instruction to match those needs. While many districts embrace collaborative teaching, it should be noted that the existence of research that verifies the effectiveness of co-teach is sparse.[27]

Oversight of the Team Teach instructional model in WCSD is decentralized to campus administrators and their instructional staff, who ultimately determine which subjects and classes will be co-taught, and which general education teachers and intervention specialists will participate. There is not a district-wide standard as to which content areas and/or grade levels should have co-teach classes. Input regarding which SWD should be scheduled in a co-teach class is provided by the Special Education Coordinator supporting that campus.

Eight Team Teach classes were observed during the on-site visit. School visits confirmed variations across campuses in terms of which grade levels and content areas are co-taught, as well as the number of Team Teach classes at each campus. In general, elementary schools tend to implement Team Teach in Grades 4 and 5 Math classes; middle schools tend to implement Team Teach in ELA and Math classes at varying grade levels; and high schools implement Team Teach in ELA, Math, Science, and Social Studies. Elementary schools visited had only two or three co-teach classes; middle schools reported between eight and ten co-teach classes, and high schools visited reported having up to eighteen co-teach classes.

Although WCSD is making a substantial investment in Team Teach, it lacks a districtwide strategy with clear expectations and supports to ensure that the instructional model is well-implemented. Currently, team-teaching is not being fully utilized to deliver specially designed instruction (SDI), evidenced by classroom observations, the IEP file review, and feedback provided by intervention specialists and campus administrators. A common practice in WCSD is for SWD in co-teach classes to receive additional minutes of service for SDI on IEP goals in a resource, supplemental, advisory, and/or study hall classroom setting. This approach is not leveraging the expertise of the intervention specialist in the general education

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[26] *The New Art and Science of Teaching*, Robert Marzano, Solution Tree Press, February 2017.

[27] Referenced from https://www.tandfonline.com/doi/abs/10.1080/13603116.2021.1900423.

classroom (who typically provides bell-to-bell support), nor is it maximizing the utilization of the school's limited staffing resources.

Implementing a Team Teach instructional model with fidelity requires weekly, structured collaborative planning time for teacher pairs to plan instruction, as well as ongoing professional development to build teacher teams' capacity to implement various co-teaching models effectively (e.g., one teach-one assist, parallel teaching, station teaching). Teachers reported that most of their collaboration time occurs after school hours. Figure 64 below shows the staff's overall response rates to a series of survey questions related to co-teach. Overall, just 30.1% of staff that responded to the survey indicated that the Team Teach instructional model is well-implemented at their campus – staff at high schools (50.5%) had the highest rate of agreement, while staff at elementary schools (49.4%) had the highest rate of disagreement. Agreement rates for general education teachers and intervention specialists were comparable at 31% and 30.7%, respectively. Less than one-third of all staff that responded to the survey also indicated that their school's master schedule supports weekly, collaborative planning time, and the District provides ongoing professional development to support the co-teach instructional model.

Figure 64. Staff Survey: Co-Teach Implementation
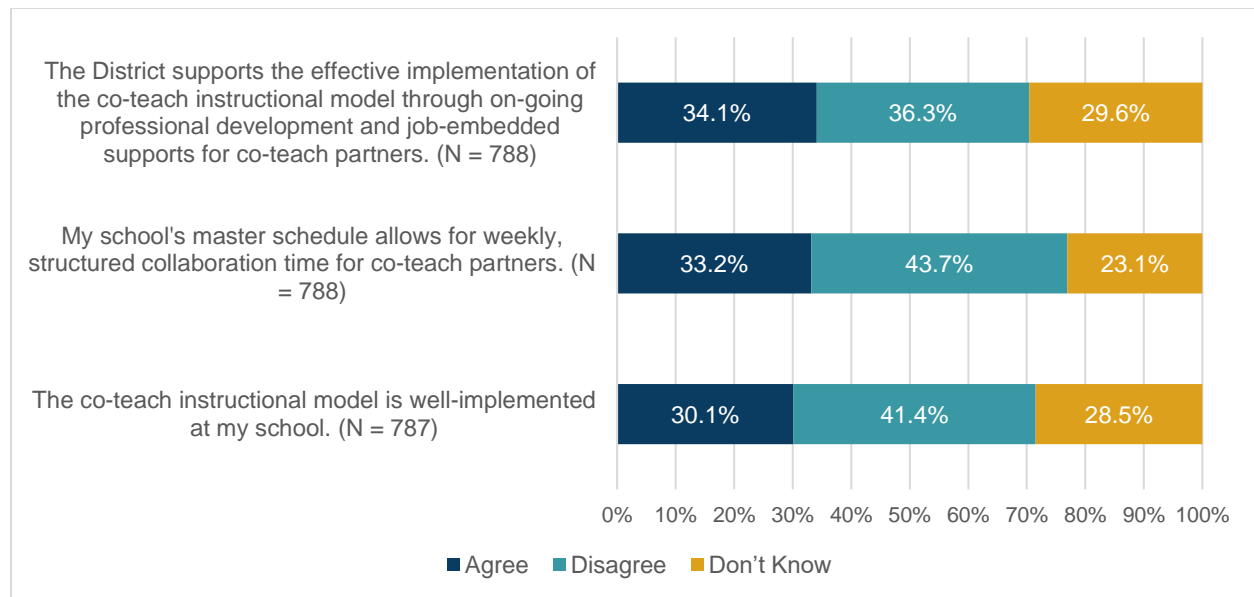
Source: Gibson Staff Survey

There also appears to be some ambiguity about the definition of "co-teach" in WCSD. Some staff appeared to conflate co-teaching with the provision of in-class supports (i.e., when an intervention specialist or paraprofessional pushes into the general education classroom to provide special education services). While the magnitude of this issue is unclear, WCSD has not provided any district-wide professional development related to Team Teach in recent years or otherwise supported this initiative through the Elementary and Secondary Teaching and Learning Departments. This is likely a contributing factor to an inconsistent (and sometimes inaccurate) nomenclature being used when discussing co-teach.

Recommendation 15: Reconstitute the Team Teach instructional model to focus on the core content areas of ELA and Math and support campuses and teacher teams in implementation fidelity.

WCSD should take several steps to ensure that campus administrators and teacher teams are well-equipped to implement this instructional model with fidelity. Below are specific implementation strategies for reconstituting this model and supporting its implementation:

- Limit co-teach classes to ELA and Math content areas at all school levels and provide guidance to campuses on which grades should be included (ideally based on academic performance).

- Limit the practice of providing SDI to SWD outside the general education classroom when it can be provided during a co-taught class. Ensure that IEPs accurately reflect the instructional setting in which SDI is being provided.

- Provide ongoing professional development and job-embedded support to team-teaching pairs by leveraging the instructional coaches at each campus and the Special Education coordinators. Although the observed teaching pairs worked well together, additional planning and training are needed to improve SWD student outcomes. Training must include instruction on how to deliver SDI in the general education classroom. If IEP teams determine that SDI cannot be delivered adequately in the general education classroom, intervention specialists should be scheduled for in-class support (ICS) for portions of the general education class and pull-out for SDI (when needed). Moving to a combination of ICS will make the delivery of SDI more efficient and could possibly reduce the number of staff needed.

- Better utilize intervention specialists and instructional aides in implementing a full-inclusion model by providing in-class supports (ICS).

- Assist campus administrators and those responsible for developing school master schedules to ensure that teacher assignments allow for collaborative planning time for all team-teaching partners within the contract day.

- Include IEP goals in teachers' lesson plans.

- Develop plans to formally evaluate Team Teach in WCSD, as quantifying program outcomes is essential to determining the efficacy of this initiative. A longitudinal analysis of student outcome data is needed.

Specialized Learning Classrooms (SLCs)

Students needing specialized programming in order to gain educational benefits may receive services in a centralized setting. These classrooms are not available at every campus, requiring that some students receive services away from their neighborhood campus. Students receiving services in these specialized settings also spend a varying amount of time in the general education classroom to the greatest extent possible. Below is a description of the specialized learning classrooms (SLCs) offered in WCSD:

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- **Cross Categorical (CC):** Students who benefit from this level of service have needs that may include academic, (and/or) behavioral, and/or executive functioning that requires targeted skill intervention. Students may have some related services but are able to maintain independence and access to the Ohio Learning Standards (OLS). Intervention services are provided in the general education setting and/or resource room.

- **Multiple Disabilities (MD):** Students who benefit from this level of service have needs in multiple areas (specific to individual student needs), profound cognitive needs, and require direct instruction on adaptive skills and curriculum through essential life skills. Students typically receive related services in multiple areas and access Ohio Extended Content Standards in a classroom with fewer students with the support of one intervention specialist and aide support. Students access the general education setting with aide support when they are able to benefit from the interaction with typical peers. Most of the daily instruction is in the resource room.

- **Emotional Disturbance (ED):** Students who benefit from this level of service have needs that relate to social/emotional development. Depending on the needs of the students, they access the OLS in the general education setting and/or the resource room. Students can access a reduced classroom size with a teacher and instructional aides. Staff and students consult with district behavior specialists and mental health staff. Adult support can be provided in many areas of the student day. Instruction includes the general education curriculum, social skills, and self-regulation strategies. Students access academics in both the general education and/or resource room. WCSD also offers an **Intensive ED (IED)** class for students with more profound disability.

- **Intellectual Disability (ID):** Students who benefit from this level of service have an identified cognitive delay, require direct instruction on adaptive skills, and may require simplified language to access the curriculum. Students access Ohio Extended Content Standards or highly modified OLS. The focus on modifications of the general education curriculum is for students to gain foundational academics. Students access academics in both the general education and resource room.

- **High Functioning Autism (HAU):** Students who benefit from this program have needs identified in the area of social/emotional development and social pragmatics and need direct instruction to access the general education setting with success. Students benefit from structure, consistency, and routine. Students may have some related services and some behavioral deficits that need to be directly instructed but are developing independence with faded adult support and access to the OLS. Intervention services are provided in the general education setting and/or resource room.

- **Intensive Autism (IAU):** Students who benefit from this level of service have needs in multiple areas and require direct instruction on adaptive skills and curriculum through essential life skills. Students access Ohio Extended Content Standards in a classroom with fewer students with the support of one intervention specialist and aide support. Students access the general education setting with aide support when they are able to benefit from the interaction with typical peers. The instructional setting includes a smaller ratio, sensory integration, and a focus on increasing independence through individualized schedules, maintenance, and generalization of skills. Students typically receive related services in multiple areas. Most of the daily instruction is in the resource room.

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Table 24 below lists specialized programs available at each campus during the 2021-21 school year.

Table 24. Specialized Programs by Campus, 2021-22

Campus	CC	MD	ED	ID	HAU	IAU	IED
Elementary Schools							
Alcott	Yes	Yes		Yes			
Annehurst	Yes						
Cherrington	Yes				Yes	Yes	
Emerson	Yes						
Fouse	Yes						
Frost	Yes			Yes			
Hanby	Yes						
Hawthorne	Yes				Yes		
Huber	Yes		Yes				
Longfellow	Yes						
McVay	Yes	Yes	Yes				
Pointview	Yes					Yes	
Twain	Yes						
Whittier	Yes				Yes	Yes	Yes
Wilder	Yes	Yes		Yes			
Middle Schools							
Blendon	Yes	Yes			Yes		
Genoa	Yes	Yes	Yes				
Heritage	Yes		Yes	Yes			Yes
Walnut	Yes	Yes	Yes	Yes			
High School							
Central	Yes	Yes	Yes	Yes			
North	Yes	Yes	Yes	Yes	Yes		Yes
South	Yes	Yes	Yes	Yes	Yes		
Total Campuses	**22**	**9**	**8**	**8**	**6**	**3**	**3**

Source: WCSD Data Request (#31)

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Commendation 8: Classroom walkthrough rubrics have been developed for all specialized learning classrooms.

The Special Education Department has developed classroom walkthrough protocols to guide campus administrators in conducting classroom observations for each of the SLCs, including co-teaching classrooms and resource rooms. Each of the protocols include "look-fors" related to instruction, environment, classroom management, and professional conduct. In group interviews, principals reported that they were familiar with the protocols and that they were useful in their classroom walkthroughs.

Finding 17: The current configuration of special education classes may create compliance risks for WCSD by determining student placement on a disabling condition rather than on an individualized basis.

With the exception of general education classrooms and cross-categorical classrooms, students with disabilities are placed in specialized learning classrooms according to their disabling condition. This practice is stigmatizing and ignores the fact that placements that are least restrictive for one child may not be least restrictive for another child and that decisions about placement must be made according to individual needs as stated in the IEP. IDEA requires that consideration must be given to "each child's unique educational needs and circumstances, rather than by the child's category of disability, and be based on the child's IEP" (71 Fed. Reg. 46586). Identifying classes by disability type may pose compliance risks for WCSD in this regard.

Recommendation 16: Redesign and rename all classes that currently have a disability category designation to reflect the level of supplementary aids and services that will be provided in the class.

WCSD recently decided to consolidate the number and type of SLCs that it will offer beginning in the 2022-23 school year. Most notably, a Life Skills class will replace the MD and IAU class (which will now be used to describe low-incidence programming); the CC, ED, ID, and AU (now used to describe AU and IAU programming) specialized learning classrooms will still be offered throughout the district, but the number and locations may differ from prior years based on student enrollment.

Complete descriptions for each SLC, as well as entry/exit criteria, should be developed to describe the service delivery model better. Descriptions should include supplementary aids and services available in the classroom, staffing ratios, curriculum, and any other relevant information that would be useful to both staff and parents in understanding a particular SLC. Appropriate names for each SLC should be applied. Acronyms or motivating titles such as "Achieve" or "Aspire" are frequently used to describe alternative special education classes in other districts.

Finding 18: SWD do not have equal access to Career and Technical Education (CTE) courses.

WCSD students may take Career and Technical Education (CTE) courses taught at Columbus Downtown High School and Fort Hayes Career Center in the Columbus City School District or Delaware Area Career Center in the Delaware City School District through a cooperative program offered by these two neighboring districts. CTE courses are typically offered in Grades 11 and 12, except the Engineering program (a 3-year program beginning in Grade 10) and a few other one-year programs taken during senior year.

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The CTE Department publishes the following statement regarding admission to career technical courses on the District's website:

> *Coursework for Career Tech Instruction is typically not MODIFIED or ADJUSTED in any way as it is driven by Industry Credentials/Exams. If a future IEP team determines that the curriculum would need adjusted in any way the modifications, a student may not receive all of the curriculum needed to pass Webxam tests and obtain industry credentials. Although enrollment in the CTE programming is not a guarantee of passing credential exams; adjustment of curriculum would greatly reduce the likelihood of this outcome. Coursework for Career Tech Instruction is typically not MODIFIED or ADJUSTED in any way as it is driven by Industry Credentials/Exams. Enrollment in the CTE programming is an exposure to the curriculum and is not a guarantee of passing credential exams. Students will receive support via enrollment in coursework with no additional pull-out services in the IEP service room due to time constraints of attending Career Center for transition services. Students will need to recover any needed credits outside of the school day and at parent expense as well as pass all current coursework in order to attend Career Tech programming. Career Technical instruction will take place in the regular education setting with accommodations as allowable by the career center which is driven by the allowable accommodations for credentialed programming and examinations.*

The review team believes this admission policy poses compliance risks related to the 1998 Perkins Act, which requires equal access for special populations, including SWD, to all vocational programs, services, and activities, and prohibits discrimination based on special population status. SWD are also protected by the Office for Civil Rights (OCR) of the United States Department of Education, which requires that districts, including charter schools, provide CTE programs, services, and activities in accordance with the requirements of Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990. Criteria controlling student eligibility for admission to vocational education schools, facilities, and programs may not unlawfully discriminate on the basis of race, color, national origin, sex, or handicap. Recipients of federal funds may not develop, impose, maintain, approve, or implement such discriminatory admissions criteria. Recipients may not deny handicapped students access to vocational education programs or courses because of architectural or equipment barriers, or because of the need for related aids and services or auxiliary aids. If necessary, recipients must: (1) modify instructional equipment; (2) modify or adapt the manner in which the courses are offered; (3) house the program in facilities that are readily accessible to mobility impaired students or alter facilities to make them readily accessible to mobility impaired students; and (4) provide auxiliary aids that effectively make lectures and necessary materials available to postsecondary handicapped students; (5) provide related aids or services that assure secondary students an appropriate education.[28]

It is clear that SWD have the same rights to participate in CTE courses as non-disabled students, and no regulation of the school district should inhibit access. The IEP sample included eight high school students; only one participated in CTE courses for a brief period.

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[28] Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs (Guidelines).

Transportation is provided from all three high schools and several neighborhood pick-up points to the Career Centers. All of the pick-up points are on the County's south end, giving students who attend Westerville South High School an advantage in regard to access to the Career Centers. Students who attend Westerville North and Westerville Central High Schools must travel to their schools to access transportation, but feedback from District administrators indicated that their buses do not arrive at the schools in time for students to take the bus going to the Career Centers. Transportation is a related service as defined by 34 CFR §300.34(c)(16) of IDEA and can include travel to and from school and between schools; therefore, transportation cannot prohibit a SWD's access to CTE.

Table 25 shows that the total number of SWD attending the Career Center is highest at Westerville South High School and has increased over the past five years, while participation is lower and declining at Westerville North and Westerville Central High Schools. This data seems to support the inherent advantage that SWD at Westerville South have in attending the Career Centers due to the transportation schedule.

Table 25. Career Center Enrollment for SWD by High School, 2017 to 2022

Program	2017-18	2018-19	2019-20	2020-21	2021-22
Westerville North HS					
Career Center	37	28	29	21	22
Job Training	25	24	30	19	17
Career Exploration	15	14	13	13	11
Westerville Central HS					
Career Center	31	42	30	27	20
Job Training	1	8	6	2	7
Career Exploration	19	17	21	10	18
Westerville South HS					
Career Center	32	43	41	39	49
Job Training	0	1	2	2	2
Career Exploration	21	19	33	8	10
MD/BOBW					
Career Center	6	6	4	3	4
Job Training	0	0	0	0	0
Career Exploration	24	20	18	18	22

Source: WCSD CTE enrollment data

Recommendation 17: Eliminate practices that preclude some SWD from participating in CTE courses.

WCSD should seek legal counsel in evaluating and renegotiating the cooperative agreements with Columbus City School District and Delaware Area Career Center to ensure equal access to CTE courses

by SWD. It is recommended that the District modify the language in its CTE admission statement to remove any language that may be discriminatory.*"*

While it is true that Industry Credentials/Exams are an established standard, this should not prevent SWD from participating in CTE classes even if certification may not be earned. WCSD should provide training for high school intervention specialists and transition staff to ensure they are aware of the change in the policy. The training should include the understanding that transportation cannot prohibit SWD participation in career technical courses and must be provided as a related service if needed.

Professional Development

Professional learning is one of the most powerful ways to raise student achievement. Current research shows that ongoing, collaborative, and primarily job-embedded professional learning for teachers leads to an increase in student achievement.[29]

Finding 19: Professional development opportunities are not meeting the needs of instructional and support staff working with SWD.

The WEA Master Agreement *Chapter 9 – Professional Development* specifies the conditions for professional development in WCSD for both certificated and licensed staff. In WCSD, district-wide professional development is primarily offered through two Westerville Education days (referred to as "WE Days"), three hours each semester, and four early release/late start sessions. New teachers are required to attend a three-day mandatory New Teacher Orientation (NTO) prior to the first work day of their first work year.

The role of the central office should be to ensure that systems and structures are in place so that all professional learning is high-quality, aligned to district initiatives and/or priorities, and to the specific learning needs of individuals, learning communities, and schools. The Teaching and Learning Department in WCSD, however, has not articulated a clear vision or strategy for professional learning, nor has it developed a comprehensive plan to ensure that all educators and staff who support student learning engage in continuous improvement; have multiple, differentiated supports for increasing their effectiveness and for career growth; and, support a culture of collective responsibility for student success. The Gifted and Talented and Professional Development Coordinator in the Teaching and Learning Department is currently in the process of developing a professional development plan, which is positive. However, the long-term lack of a centralized professional learning plan has resulted in a professional learning system that does not meet the learning needs of staff and is not aligned to District priorities or informed by student needs.

Feedback on the staff survey regarding the District's professional development opportunities and during individual and group interviews was generally unfavorable. As shown in Figure 65, just over 45% of staff who responded to the survey agreed that the District ensures that the professional learning needs of staff who support SWD are addressed, and 42.5% of staff agreed that the professional development provided by the District is high-quality.

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[29] Learning Forward, the National Staff Development Council (NDSC), and the National Comprehensive Center for Teacher Quality.

Figure 65. Professional Development

The District provides high-quality professional learning related to special education and supporting students with disabilities. (N = 790): Agree 42.5%, Disagree 45.9%, Don't Know 11.5%

The District ensures that the professional learning needs of all teachers and staff who support SWD are addressed. (N = 788): Agree 45.4%, Disagree 43.7%, Don't Know 10.9%

Legend: ■ Agree ■ Disagree ■ Don't Know
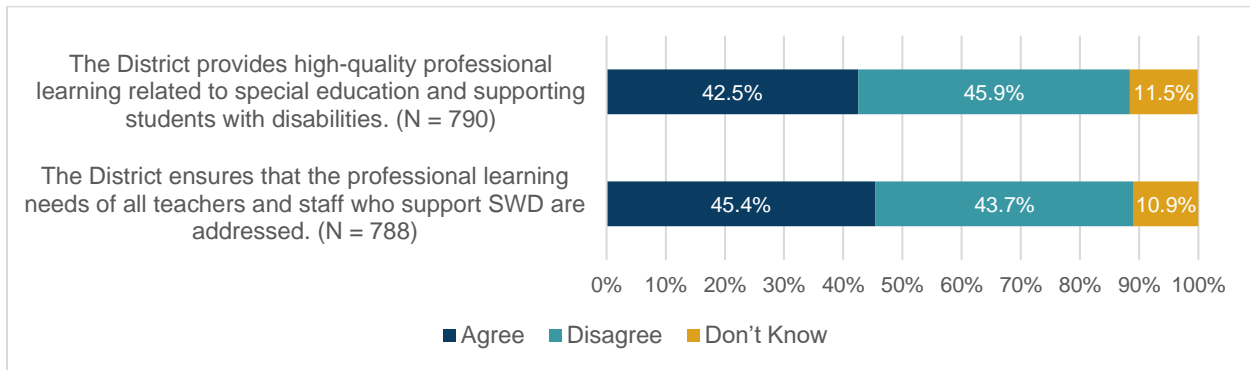
Source: Gibson Staff Survey

When asked about the various ways in which staff participate in professional development, staff meetings, campus-based professional development, and district-wide professional development were most frequently cited (Figure 66). Fewer than 20% of staff indicated that they receive professional development through a PLC or job-embedded coaching; this is problematic as there is an absence of reach that points to these two methods for delivering professional development as being highly effective. Campus-based professional development was indicated by 36.8% of staff as being most effective, followed by staff meetings (34.5%). Interestingly, 21.6% of staff selected "none" when asked which type of professional development was most effective.

Figure 66. Staff Survey: What types of professional development have been made available/most effective in helping you improve your knowledge, skills, and practices as it relates to supporting SWD?

Category	Availability of PD	Effectiveness of PD
Staff meetings (N = 782)	72.5%	34.5%
Campus-based PD offered throughout the school year (N = 782)	55.9%	36.8%
District-wide PD offered during the summer (N = 782)	40.5%	12.1%
Book studies (N = 782)	29.3%	11.6%
Professional learning communities (PLCs) (N = 782)	19.6%	13.1%
Off-site conferences (N = 782)	15.2%	13.1%
Job-embedded coaching (N = 782)	14.3%	17.2%
Other (N = 782)	10.6%	12.6%
None (N = 782)	9.5%	21.6%
Regional service center PD or consultation (N = 782)	3.6%	2.5%

Legend: ■ Availability of PD ■ Effectiveness of PD

Source: Gibson Staff Survey

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This past year, some secondary staff participated in leader learning rounds. Instructional rounds like these are adapted from the practice of "grand rounds" in medical schools to observe teaching and learn to discern root causes for problems identified by the school and to help the school and district create more productive outcomes. The problem of practice around which the learning rounds in WCSD were designed was focused on the implementation of a middle school design. Administrators and teachers worked on teams that visited each middle school building once per semester; they were able to visit five of the seven campuses before the district canceled any professional development that took teachers out of classrooms due to a shortage of substitutes.

Overall, 74% of staff that responded to the survey indicated that they feel adequately prepared to teach or provide support services to SWD. However, agreement rates varied based on the number of years employed by the District. Staff that have been with WCSD for less than two years (61.5%) and more than 30 years (60%) had much lower rates of agreement than staff with service between three and 29 years (Figure 67).

Figure 67. Staff Survey: I feel adequately prepared to teach or provide support services to SWD.
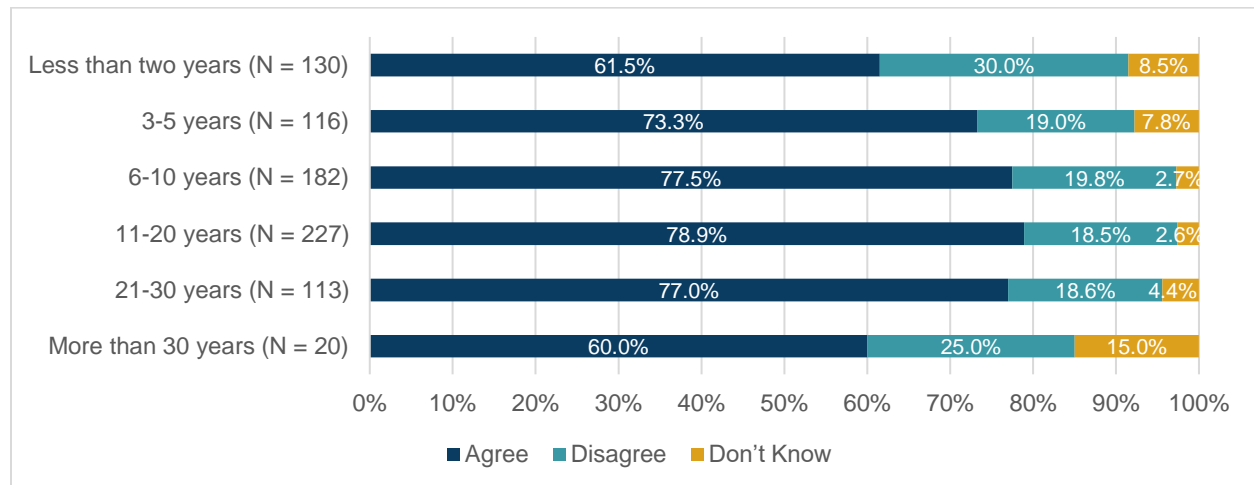
Source: Gibson Staff Survey

Just 23.7% of staff agreed that teachers new to the profession or new to teaching SWD receive additional, specialized support prior to or during their first year of teaching. Nearly all of the educators that participated in a group interview pointed to a lack of a quality onboarding program ("It was all logistics. There is nothing to prepare new teachers for the curriculum. I had to figure it out on my own.").

Just over 40% of staff that responded to the survey agreed that there are sufficient role-specific professional development options related to special education, while 55.1% of staff disagreed with this statement (and 15.9% of staff indicated "strongly disagree"). As shown in Figure 68, campus administrators had the highest agreement rate (at just 58.6%), while intervention specialists had the highest disagreement rate (62.1%). Anecdotally, educators shared during interviews that the professional development offered annually during WE days was frequently a "repeat of sessions taken previously" or "too focused on compliance." All staff shared that they would appreciate more opportunities to collaborate and learn from their colleagues through regular "Job Alike" meetings and would also like to understand the instructional resources available to them better.

Figure 68. Staff Survey: There are sufficient professional development options related to special education for my role/position.
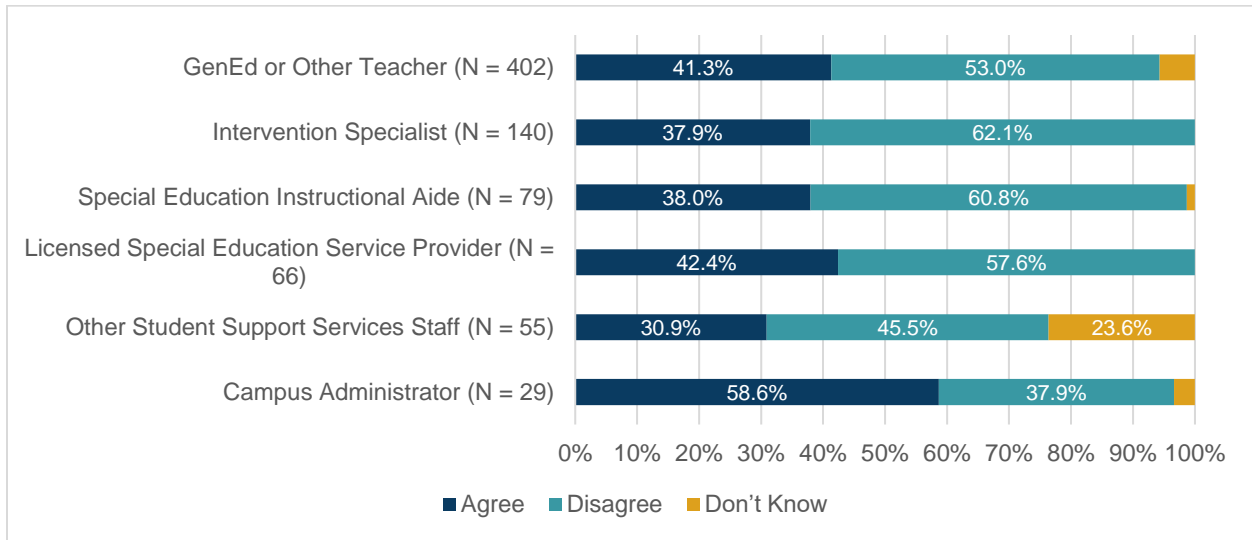
Source: Gibson Staff Survey

Just 41.4% of staff feel that the District provides adequate training on supporting SWD in the general education setting. Intervention specialists and licensed service providers had the highest disagreement rates, with more than 56% of staff disagreeing with this statement. Anecdotally, staff shared that training for co-teaching, Tier 1 instruction, and inclusion was needed because these are offered inconsistently, resulting in new teachers or new co-teaching pairs not receiving needed training. When training is offered, many teachers opt-out. For example, general education teachers had the opportunity to participate in four days of Universal Design for Learning (UDL) training, but most did not participate because they did not want to be absent from their classroom.

Figure 69. Staff Survey: The District provides adequate training on supporting SWD in the general education setting.

Source: Gibson Staff Survey

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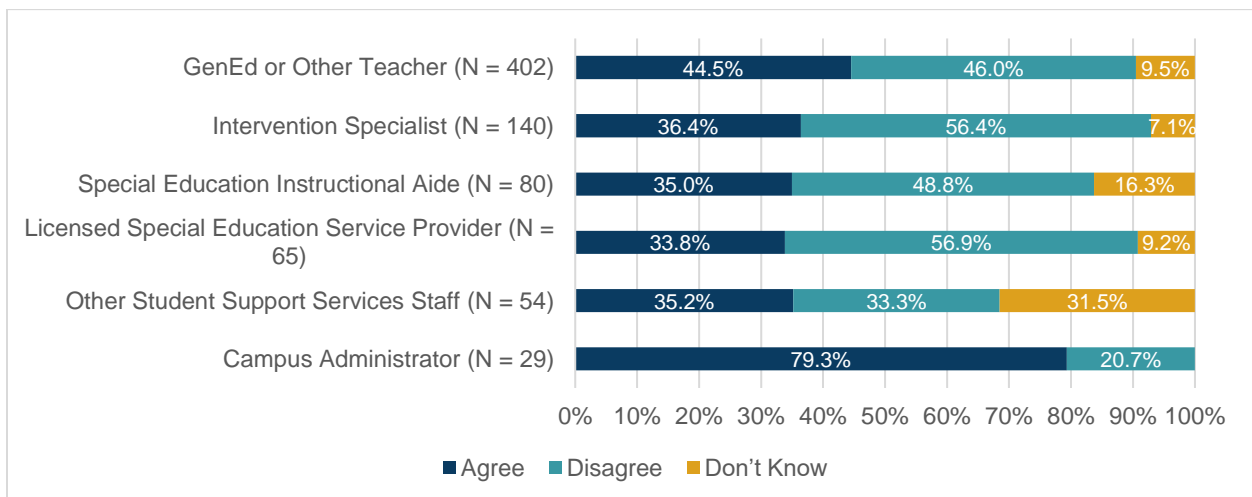
Recommendation 18: Develop a comprehensive professional learning plan based on disaggregated student data to align resources and guide the ongoing professional learning for all educators in the District.

A comprehensive professional learning plan will help to align resources to ensure that professional learning supports the implementation of the District's priorities and leads to improved student outcomes. Well-designed and implemented professional development for school employees is an essential long-term investment in successfully teaching all students to high standards. *Learning Forward* offers a plethora of no-cost resources to assist school systems in developing robust professional learning plans, and it is recommended that WCSD leverage those resources to guide this initiative. Broadly, there are seven steps for developing both short- and long-term professional learning plans:

1. Analyze student learning needs;

2. Identify characteristics of the community, district, school, department, and staff;

3. Develop improvement goals and specific student outcomes;

4. Identify educator learning needs and specific goals and objectives;

5. Study research for specific professional learning programs, strategies, or interventions;

6. Plan professional learning implementation and evaluation, including establishing a logic model for specific professional learning programs; and,

7. Implement, evaluate, and sustain professional learning.

The review team did not review the draft Professional Development Plan currently being written by the Gifted and Talented Coordinator. District leadership should ensure that this plan includes all essential components and is developed with input from all of the District's stakeholders, including general education teachers, intervention specialists, licensed service providers, and other non-licensed staff.

While formal training is important for increasing teachers' knowledge and ability to implement learned skills, learning can occur in less formal structures. Below are some suggestions to provide both teachers and paraprofessionals with more flexible, innovative, and personalized professional development based on their individual learning needs:

- EDCamps – sessions are determined on the day of the event, anyone who attends can be a presenter, and participants select sessions based on their needs

- Ignite sessions – teachers have five minutes and can use no more than 20 slides to share a practice at faculty meetings

- Twitter chats – a scheduled, organized topical conversation on Twitter centralized around a specific hashtag

- Micro-credentials – mini-degrees or certifications in a specific topic area

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- Personalized learning playlists – a series of activities such as articles to read, lessons to design, or videos to view focused on specific content

- Massive open online courses – are online courses aimed at unlimited participation and open access via the Internet

- Gamification – the process of using game mechanics and game design elements in non-video game environments to engage employees better and create an experience that is more interesting to them

The benefit of using these types of flexible, personalized learning is that most have no costs associated. Additionally, staff will enjoy participating in professional learning at a time convenient for them and on topics that are relevant to their needs. Learning formats that connect general education and special education teachers will create a team dynamic that can enhance inclusion efforts. Providing more time for collaboration on how to implement IEPs, how to support students with disabilities academically and behaviorally, and how to implement accommodations will foster a stronger learning environment for all students.

Family 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 that as parents become involved and empowered in the special education process, student outcomes improve.

Procedural Safeguards

Procedural safeguards are the formality requirements of the IDEA that are designed to protect the rights of parents and their child with a disability and, simultaneously, give families and school systems several mechanisms to resolve their disputes. The procedural safeguards help to ensure the proper education of children with disabilities by affording parents the right to meaningfully participate in their children's educational programming decisions.

The IDEA identifies the following eight guaranteed safeguards:

1. An opportunity for parents to examine records, participate in meetings, and obtain an independent educational evaluation.

2. Procedures to protect the rights of the child when the parents are not known, if they cannot be located, or if the child is a ward of the state.

3. Prior written notice (PWN) whenever the district proposes (or refuses) to initiate or change the identification, evaluation of the educational placement of the child, or the provision of FAPE.

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4. Procedures are designed to ensure that notices are in the native language of the parents unless it is clearly not feasible to do so.

5. An opportunity for mediation.

6. An opportunity for any party to present a complaint.

7. Procedures that require either party (or the party's attorney) to provide a due process complaint notice.

8. Procedures that require the LEA to develop a model form to assist parents in filing a complaint and due process complaint notice.

Section 504 requires school districts to establish and implement procedural safeguards that include notice, an opportunity for parents to review relevant records, an impartial hearing with an opportunity for participation by the student's parents or guardian, representation by counsel, and a review procedure.

Commendation 9: Conflict prevention and dispute resolution practices appear to be effective, evidenced by a low number of administrative reviews and due process hearings.

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. District-provided data show that since 2017 the number of mediations and due process hearings have been minimal (for a district the size of WCSD)—two ODE complaints, one administrative review, four facilitated IEPs, and nine mediations.

WCSD participates in the Ohio Parent Mentor Project, which provides for a Parent Mentor position funded by a grant from the Ohio Department of Education (ODE). The Parent Mentor is responsible for assisting parents of children with disabilities by guiding families through the special education process and providing them with support, information, and training services. This process includes clarifying parents' rights and responsibilities and providing information and resources to families and school personnel on education laws, district programs and services, and community resources; attending IEP meetings and other meetings at the request of the parents and/or school staff; and, building collaborative partnerships between families, schools and community agencies for the purpose of benefiting SWD. Increasing the capacity of parents of SWD to meaningfully collaborate and problem-solve offers a proactive strategy for conflict management.

Commendation 10: The Special Education Family Engagement Forum provides an opportunity to engage and support parents of students with disabilities.

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All parents can and should participate meaningfully in their children's education, including those whose children receive special education services. Research demonstrates that parent/family involvement significantly contributes to improved student outcomes. More than 60% of staff that responded to the survey indicated that their campus provides ample opportunities to engage parents of SWD, while 73.8% indicated that parents of SWD are routinely involved in decisions regarding their child's learning needs. Nearly 62% of staff indicated that parents of SWD are involved in their child's academic learning.

Figure 70. Staff Survey: Parent Involvement
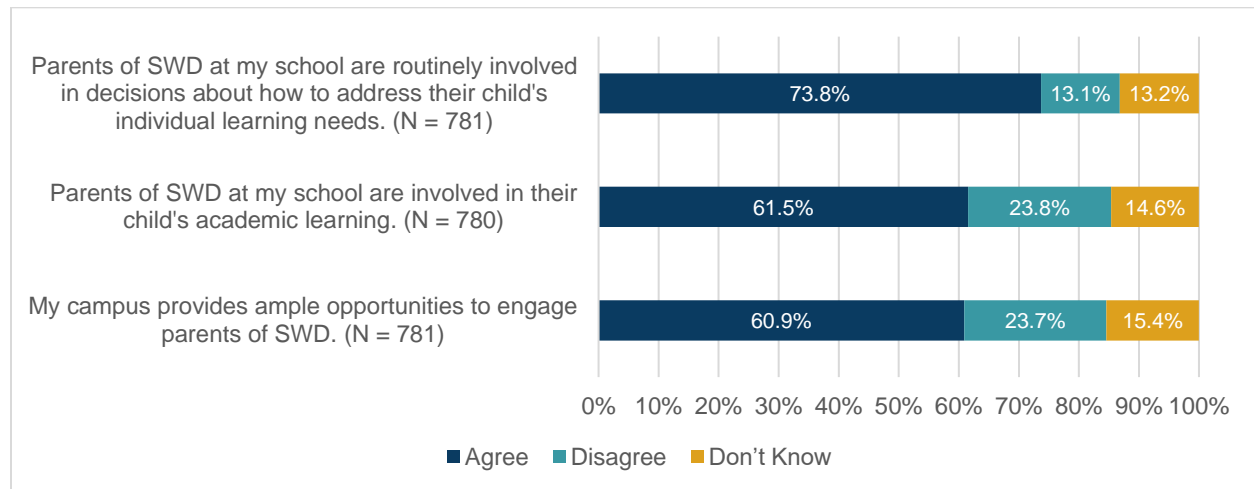
Source: Gibson Staff Survey

In an effort to improve parental involvement, WCSD began hosting a Special Education Family Engagement Forum beginning in 2021-22, which consists of four virtual meetings during the course of the school year— one per quarter—to discuss topics related to the education of students with disabilities (SWD). Through these meetings, the District's Special Education Leadership team shares information and resources with families, as well as information about instruction, technology, transition, and special education services. Information provided by Department staff indicates that the forums have been well-attended, and feedback provided by parents that participated in a group interview was also very positive.

Finding 20: WCSD does not collect information from parents who choose alternate special education options in the Westerville area.

To improve school choice, the State of Ohio provides several scholarship programs to families of SWD who meet the criteria for qualification. Although WCSD is not responsible for providing any services to students on a scholarship, it is still responsible for conducting all initial evaluations and reevaluations, and for developing the IEPs and making annual updates. Approximately 180 SWD within the Westerville district boundaries participate in the two State scholarship programs:

- The **Jon Peterson Special Needs (JPSN) Scholarship Program** provides Ohio parents of children with special needs enrolled in public schools vouchers to pay for private school tuition, private therapies, and other services covered by their Individual Education Plans (IEPs). The Ohio Department of Education sets school voucher limits for different types of disabilities, so funding and eligibility vary (but does not exceed $27,000).

- The **Autism Scholarship Program (ASP)** gives the parents of children with autism who qualify for a scholarship the choice to send the child to a special education program other than the one operated by the school district of residence to receive their education and the services outlined in the child's IEP. Any student who has been identified by their district as a child with autism and for whom the district has created an IEP qualifies for the ASP.

Feedback from District staff suggests that the high number of students attending one of the State scholarship programs, or otherwise choose to send their child to a private/parochial school, is partly due to the fact that there are a high number of private/parochial schools located in or near the Westerville City boundaries.

Recommendation 19: Expand parent engagement programs to sustain local participation in WCSD's special education program.

Expanding parent outreach could increase revenues to the school district. WCSD should look to additional opportunities to engage parents of SWD in Westerville who do not choose to send their children with disabilities to WCSD schools. It is recommended that WCSD:

- Survey parents/families who are participating in any of the State's scholarship programs to determine their current levels of satisfaction with their school choice option. Understanding the primary drivers of their decision to pursue a scholarship program in lieu of WCSD is essential to determining what factors within the control of WCSD could be addressed that would better meet the needs of these families and students.

- Create a Special Education Parent Advisory Committee (SEPAC) to obtain input regarding the quality of services for SWD in order to increase parent satisfaction with the special education program within WCSD. Organizing a SEPAC can serve as a vehicle for providing direct input to school district leaders about policies, programs, practices, and services that have an impact on students with disabilities and their families. It is a volunteer group composed of parents/guardians of children receiving special education and/or 504 services, community representatives, and district representatives who are focused on improving the lives and educational outcomes of students with special needs and their families. Parents of SWD should be invited to form a group that would meet quarterly with district leaders to discuss matters pertaining to services and programs for SWD. Providing opportunities, such as an advisory council, gives parents a voice and could decrease the number of families who exercise their right to use scholarships or seek services for their children from other organizations outside the District.

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Appendix A – Interviews and Campus Visits

Interviews

The review team conducted interviews with the following Westerville City School District (WCSD) employees:

- Dr. John Kellogg, Superintendent

- Paul Hopkins, Assistant Superintendent of Teaching and Learning

- Rhonda Gilpin and Sarah Painter, Westerville Education Association (WEA) President and WCSD Transition Coordinator representative

- Guerdie Glass, Director of Special Education

- Adam Flugge, Special Education Coordinator

- Jill Fogel, Special Education Coordinator

- Michael Seitz, Special Education Coordinator

- Lisa Smith, Special Education Coordinator

- Lindy Whitson, Special Education Coordinator

- Jennifer Winters, Special Education Coordinator

- Dr. Elizabeth Jelkin, Special Education Coordinator (Disability Compliance and Civil Rights)

- Stephanie Thomas, Parent Mentor

- Barbara Wallace, Executive Director of Elementary Schools and Cheryl Relford, Director of Elementary Schools

- Anne Baldwin and Jennifer Knapp, Executive Director and Director of Secondary Schools

- Scott Reeves, Executive Director of Employee Relations

- Suzanne Kile, Director of Preschool

- Juliet Peoples, Coordinator of State and Federal Programs

Stakeholder Group Interviews

The review team conducted group interviews with the following stakeholders:

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- Principals
- Elementary Intervention Specialists
- Secondary Intervention Specialists
- Elementary General Education Teachers
- Secondary General Education Teachers
- Psychologists
- School Guidance Counselors
- Related Service Providers/Therapists (OT/PT, SLP, APE)
- Mental Health Counselors and Behavior Therapists
- Elementary Instructional Aides
- Secondary Instructional Aides
- Parents of students with disabilities

Campus Visits

The review team visited the following schools:

- Early Learning Center Preschool
- Alcott Elementary School
- Hawthorne Elementary School
- McVay Elementary School
- Whittier Elementary School
- Heritage Middle School
- Walnut Springs Middle School
- Westerville North High School
- Westerville South High School

Appendix B – IEP File Review

All children with disabilities, regardless of the type or severity of the disability, have a right to a free and appropriate public education (FAPE), 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 and related services that will be provided so that the child can meet their goals and learning objectives. As described in Public Law 108-44637, the legally required components of the IEP are:

- 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 division-wide 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 non-disabled 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 IEP 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;

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

- Transportation needed to access services; and,

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

The IEP must be reviewed at least once a year by the IEP team to determine if the child is achieving the annual goals. The IEP team must revise the IEP to address any lack of expected progress, results of any reevaluation, information provided by the parents, and anticipated needs.

IEP Audit Objective and Methodology

Objective

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. Generally, a quality IEP complies 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.

Methodology

The review team reviewed 20 student IEPs, representing approximately one percent of all SWD in the District. The selection of individual students was random, but specific criteria were used in order to ensure that the sample size was representative across school levels, primary disability, and instructional settings.[30] The review team was provided read-only access to the District's special education student information system, *IEP Anywhere*.

Table B.1. provides a profile of the student characteristics of the IEPs reviewed.

Table B.1. Profile of IEPs Included in the File Review

School	Grade	Primary Disability	Instructional Setting	Special Category
Cherrington ES – 1 Mark Twain ES – 1 McVay ES – 2 Pointview ES – 1 Whittier ES – 1 Blendon MS – 1 Heritage MS – 3 Walnut Springs HS – 1 Central HS – 4 North HS – 3 South HS – 1 Boundless (OOD) – 1	Kindergarten – 1 Grade 3 – 1 Grade 4 – 1 Grade 5 – 1 Grade 6 – 2 Grade 7 – 2 Grade 8 – 3 Grade 9 – 1 Grade 10 – 4 Grade 11 – 1 Grade 12 – 3	Multiple Disabilities – 2 Emotional Disturbance – 2 Cognitive Disabilities – 2 Specific Learning Disabilities – 5 Autism – 5 Other Health Impaired (Minor) – 4	Outside Regular Class <21% – 8 Outside Regular Class 21% to 60% – 7 Outside Regular Class >60% – 5	LEP – 3

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

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Source: WCSD provided data

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 were met

2. The Present Levels of Academic Achievement and Functional Performance (PLAAFP) includes the impact of the disability and statements of academic strengths, needs/weaknesses, and functional abilities and needs

3. Justification for Least Restrictive Environment (LRE)

4. Quantifiable and measurable goals aligned with grade-level standards

5. Measurable progress toward IEP goals is provided at least every grading period

6. Appropriate levels of support and accommodations

7. Inclusion of a Behavior Intervention Plan, if appropriate

8. Consideration of the need for assistive technology

9. Consideration of the need for extended school year services (ESYS)

10. Provision of related services, if appropriate

11. Determination for participation in state and district assessments

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

IEP Audit Results

In large part, all of the IEPs address the federal requirements; however, some observations are related to the overall quality of the IEPs. The observations from the IEP audit are used to support more specific findings and recommendations discussed in other sections of this report.

The results of the IEP file audit are outlined below.

1. Annual Revision Timelines

All of the IEPs reviewed met the requirement that the IEP has been reviewed at least once per year by the IEP team, and only one reevaluation did not occur every three years as required by IDEA.

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2. Present Levels of Academic Achievement and Functional Performance (PLAAFP)

A well-written and compliant PLAAFP must include the following information as it relates to each goal: 1) a summary of current daily academic/behavior and/or functional performance (strengths and needs) compared to expected grade-level standards in order to provide a frame of reference; and 2) baseline data provided for developing a measurable goal (e.g., ETR results). All of the IEPs in the test sample were well-written and included a detailed and targeted summary of current academic, behavior, and/or functional performance related to the development of measurable goals.

3. LRE Justification

To receive Part B funds under the 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." The law's intent is a strong preference for educating students with disabilities in regular classes with appropriate aids and supports.

With the exception of one file that only listed the settings where the student would receive instruction, all student files justified the student's LRE. Four of the 20 students whose files were reviewed did not attend school on their home campus. In each case, a justifiable reason for being assigned to another campus was given.

4. 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 outline 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.

While not a requirement, objectives may be written into the IEP along with the goals. There is a requirement, however, that if a student takes an alternate statewide assessment, all of the student's

annual goals must include short-term objectives. Objectives are short-term benchmarks, or milestones, that can be used to measure a child's progress toward the bigger target—the goal.

Goals in all the student files reviewed were well written, included the SMART elements, and included objectives if required. The goals were aligned with grade-level standards and the PLAAFPs.

5. **Measurable progress toward IEP goals is provided at least every grading period**

Progress monitoring is a scientifically based practice used to assess a student's academic progress on IEP goals and evaluate the effectiveness of instruction. Data collected informs teachers on what students have learned and what remains to be taught. Progress of students with disabilities must be reported to parents at least as often as the progress of non-disabled students is reported. In WCSD, progress reports are sent to parents every nine weeks. Every IEP reviewed included progress reports for the current school year. However, one student's progress report did not give progress on all of the student's goals, and two student files did not have progress reports for all periods.

6. **Appropriate Levels of Support and Accommodations**

Accommodations allow a student equal opportunity to access the general curriculum and demonstrate what they know and are able to do without modifying the curriculum or assessment. Accommodations may be changes to the environment, instruction, or assessment and should be aligned with data provided in the PLAAFP. Accommodations should be reasonable (i.e., made with minimum preparation or change) and effective (i.e., enable students to become more independent).

Student files contained varying amounts of direct and indirect support to be provided to students. All files contained accommodations that were specific and included multiple options. In the specially designed instruction (SDI) section of the IEP, team teaching was indicated as a location for services to be delivered on three of the student IEPs in the sample. Best practice is to identify the amount of time students need support in a general education classroom but not to indicate the instructional model being used.

The review also found that three IEPs specified that students are receiving SDI on the same goals in team-taught classes as well as special education classes. Over-servicing can inflate costs for special education services beyond what is required.

7. **Inclusion of a Behavior Intervention Plan (BIP), if Appropriate**

Of the 20 files reviewed, ten students with IEPs stated that their behavior impeded their learning or the learning of others, but only one student had an FBA, and two had a BIP. The other students simply had an IEP goal to address inappropriate behaviors. One student had a crisis plan but no BIP.

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8. **Consideration of Need for Assistive Technology (AT)**

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.

AT needs were reviewed for all students in the review, and seven students were utilizing what can be considered "high-tech" AT devices. An eighth student was using a communication device, but no AT was indicated in the AT section of the IEP, only in the description of the day. Low to medium technology devices such as calculators and word processors were mentioned as accommodations but were also not shown in the AT section.

9. **Consideration of Need for Extended School Year Services (ESYS)**

ESYS is an IEP 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 IEP meeting. The need for ESYS must be discussed on an individual basis by the child's IEP Team 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.

On each IEP reviewed, ESYS had been addressed. None of the students was recommended for ESYS, but one student had indicated that further data would be collected.

10. **Provision of Related Services**

The IEP should specifically identify the provision of related services that align with the child's needs and support the achievement of annual goals. The related services provided to students in the file review included the following:

– Speech and language therapy – 9

– Transportation – 5

– Occupational therapy – 4

– Mental health counseling – 2

Although Adapted Physical Education (APE) is not a related service, it was noted that two students in the review currently receive this service. One student had counseling listed in the SDI section of the IEP, but it was not identified in the Related Service section.

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11. Determination for Participation in State and District Assessments

All students in tested grade levels and courses are expected to participate in the State of Ohio assessment program unless specifically exempted by state or federal law or by Board of Education regulations. Students with disabilities may take assessments with or without accommodations or they may be assessed through alternate or alternative assessments. The Alternate Assessment for Students with Significant Cognitive Disabilities (AASSCD) is an alternate assessment based on alternate achievement standards and is specifically designed to evaluate the achievement of students with significant cognitive disabilities. The AASSCD is available to students in grades 3 through 11 who are working on academic standards that have been reduced in complexity and depth. Only students with significant cognitive disabilities who are eligible under IDEA and who meet the AASSCD guidelines for participation may be assessed through the AASSCD.

Four students in the review qualified for the AASSCD. These students' functional level and disability aligned with the decision to provide an alternate assessment. For all other students, the accommodations provided on state and district assessments must also be utilized in the classroom to be allowed. Their testing accommodations were allowable for students who took the State assessment.

12. Transition Plans and Services

In Ohio, beginning not later than the first IEP to be in effect when the child turns 14 or younger if determined appropriate by the IEP Team, and updated annually, thereafter, the IEP must include:

– Appropriate measurable postsecondary goals based upon age-appropriate transition assessments related to training, education, employment, and independent living skills, where appropriate; and,

– Transition services (including courses of study) are needed to assist the child in reaching those goals.

Postsecondary goals must be based upon the results of age-appropriate transition assessments. Transition assessments are measures that facilitate a "planned, continuous process of gathering and organizing information on the student's strengths, needs, preferences and interests in relation to the demands of current and future living, learning, and working environments." IDEA specifies four categories around which data are collected: training, education, employment, and independent living. The information generated around these four areas allows IEP teams to design postsecondary goals and corresponding transition services for a given student in all areas of adult life.

Transition plans were completed for all eligible students in the review and included multiple career/vocational assessments in most cases, and transition services were varied and individualized.

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Appendix C – Staff Survey

Staff Survey Results

Gibson developed and administered an online survey to all campus-based administrators, teachers, paraprofessionals, licensed special education service providers, and other student support services staff who work directly or indirectly with SWD. The survey was designed to capture how WCSD staff perceive the current delivery of special education programs and services for SWD at their campus and the broader conditions within the district and at campuses that may impact the effective or efficient delivery of those services. The survey was administered between March 8 and March 18, 2022. In total, 804 staff completed the survey for an overall response rate of 58.7 percent.

The survey was administered using *Qualtrics*, an online survey platform. The survey instrument included 92 items and incorporated a seven-point rating scale. For reporting purposes, the seven-point rating scale was consolidated into three categories: Agree (strongly agree, agree, slightly agree), Disagree (slightly disagree, disagree, strongly disagree), and Don't Know (don't know or not applicable). In analyzing survey response data, the review team recommends that the District explore areas where disagreement rates exceed 20% and consider addressing any areas where disagreement rates exceed 30% more urgently.

Table C.1 below shows the percentage of staff that agreed or disagreed with each survey question.

Table C.1. Staff Survey Results

Statement	Strongly Agree	Agree	Slightly Agree	Slightly Disagree	Disagree	Strongly Disagree	Don't Know
The District has a clear vision for special education. (N = 793)	8.3%	33.2%	19.2%	12.6%	14.0%	4.5%	8.2%
There is a culture of shared ownership and responsibility for SWD at my school (e.g., educators work on behalf of all students). (N = 793)	25.0%	34.9%	16.3%	10.2%	7.4%	4.4%	1.8%
Educating SWD to high standards is a priority at my school. (N = 792)	23.1%	35.1%	16.9%	10.7%	6.9%	3.9%	3.3%
The District provides adequate resources to meet the needs of SWD. (N = 791)	6.8%	20.4%	20.0%	15.4%	20.1%	12.1%	5.2%
Resources for SWD are allocated equitably across campuses. (N = 791)	4.6%	18.5%	10.5%	12.8%	15.0%	11.3%	27.4%

Statement	Strongly Agree	Agree	Slightly Agree	Slightly Disagree	Disagree	Strongly Disagree	Don't Know
There are sufficient staff available to meet the needs of SWD at my school. (N = 790)	4.7%	13.3%	11.3%	17.5%	24.7%	25.3%	3.3%
Special Education Department staff are accessible. (N = 791)	27.6%	34.0%	16.9%	8.8%	5.3%	4.2%	3.2%
Special Education Department staff (e.g., Director, Coordinators) are responsive to my needs. (N = 791)	22.0%	28.7%	17.8%	8.0%	6.3%	4.8%	12.4%
The Special Education Department has established written procedures for staff to follow regarding special education processes. (N = 793)	21.8%	32.3%	14.2%	7.9%	6.3%	3.8%	13.6%
Special education processes are implemented consistently at my campus. (N = 791)	17.1%	29.3%	15.5%	12.3%	10.0%	7.0%	8.8%
The District has consistent special education practices across campuses. (N = 790)	5.1%	18.7%	11.1%	13.2%	13.8%	9.0%	29.1%
I feel supported at my campus. (N = 789)	21.9%	33.8%	18.9%	9.8%	6.8%	7.7%	1.0%
I am satisfied in my current job role. (N = 792)	32.3%	31.1%	14.5%	8.7%	6.9%	5.7%	0.8%
My daily workload is manageable within the school day. (N = 792)	10.7%	22.7%	15.7%	13.5%	15.7%	21.3%	0.4%
I would recommend my school to friends and colleagues as a good place to work. (N = 791)	25.3%	30.7%	18.3%	7.8%	8.1%	8.6%	1.1%
MTSS/RTI or other early intervention model is used at my school to address individual learning needs and reduce referrals to special education. (N = 795)	16.5%	34.1%	16.0%	4.3%	5.0%	3.9%	20.3%
Special education and general education teachers within my department and/or grade-level team meet and collaborate	15.3%	26.0%	16.1%	9.5%	15.6%	7.0%	10.5%

Statement	Strongly Agree	Agree	Slightly Agree	Slightly Disagree	Disagree	Strongly Disagree	Don't Know
regularly about instruction and students. (N = 797)							
Teacher teams at my school consistently utilize data to adjust instructional practices, groupings, and/or schedules to better meet their students' learning needs. (N = 797)	18.6%	31.7%	17.6%	7.5%	8.9%	4.3%	11.4%
My campus has a clear and effective process for providing academic interventions. (N = 797)	12.4%	27.1%	20.5%	11.5%	11.8%	7.5%	9.2%
My campus has a clear and effective process for providing behavioral interventions. (N = 797)	6.0%	17.1%	20.2%	14.4%	20.7%	16.1%	5.5%
My campus has a clear and effective process for identifying students with a suspected learning disability. (N = 795)	15.1%	37.1%	17.6%	9.8%	7.7%	4.4%	8.3%
The special education student identification and evaluation process is unbiased. (N = 794)	18.5%	34.4%	12.1%	9.7%	7.7%	3.1%	14.5%
IEP teams are thoughtful and collaborative in deciding how much SWD should be included in the general education classroom and the level of supports they need. (N = 793)	19.7%	39.7%	14.1%	6.6%	5.5%	3.5%	10.8%
IEP teams consistently use data to make decisions regarding student placement, the schedule of services, and development of IEP goals. (N = 794)	21.7%	41.4%	14.9%	5.4%	3.7%	2.3%	10.7%
SWD at my school are served in settings with their nondisabled peers to the greatest extent possible. (N = 795)	31.7%	42.1%	11.4%	5.0%	2.8%	1.4%	5.5%

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Statement	Strongly Agree	Agree	Slightly Agree	Slightly Disagree	Disagree	Strongly Disagree	Don't Know
My input is solicited and valued in the development of students' IEP goals. (N = 794)	24.4%	40.1%	15.4%	4.2%	4.4%	4.0%	7.6%
The District offers a full continuum of services that meets the needs of all SWD. (N = 795)	9.1%	28.3%	17.1%	12.1%	9.8%	8.8%	14.8%
The District is meeting the social and emotional needs of SWD. (N = 790)	4.6%	23.4%	22.2%	14.8%	14.7%	9.6%	10.8%
The District is meeting the academic needs of SWD. (N = 788)	6.2%	33.2%	22.7%	12.1%	10.2%	7.0%	8.6%
The District is meeting the academic and social and emotional needs of SWD who are also gifted. (N = 787)	4.6%	20.6%	16.1%	10.5%	10.0%	6.0%	32.1%
The District is meeting the academic and social and emotional needs of SWD who are also bilingual. (N = 790)	4.7%	19.0%	15.9%	12.7%	12.7%	8.7%	26.3%
The District is meeting the academic and social and emotional needs of SWD who are economically disadvantaged. (N = 787)	6.2%	27.4%	18.0%	13.5%	11.2%	7.8%	15.9%
The District is meeting the academic and social and emotional needs of students who have a 504 plan. (N = 789)	6.2%	28.0%	16.6%	9.4%	6.5%	5.4%	27.9%
The District provides my school with high-quality materials -- including scope and sequences, curriculum, and assessments -- to support implementation of rigorous instruction aligned with college- and career-ready standards. (N = 790)	9.5%	24.9%	18.4%	10.6%	8.9%	8.9%	18.9%
The District ensures that all specialized curriculum and instructional programs are	17.4%	42.2%	13.7%	2.9%	3.0%	3.3%	17.5%

Statement	Strongly Agree	Agree	Slightly Agree	Slightly Disagree	Disagree	Strongly Disagree	Don't Know
aligned with the State standards. (N = 789)							
Inclusion practices at my school benefit all students. (N = 790)	15.9%	34.9%	16.1%	12.9%	8.2%	6.3%	5.6%
The proportion of students in inclusion classrooms who require significant supports and/or accommodations is appropriate. (N = 789)	5.3%	28.4%	14.8%	15.0%	11.2%	11.5%	13.8%
Teachers within my department and/or grade-level team consistently plan lessons to meet a variety of student learning needs. (N = 789)	21.9%	35.6%	13.1%	9.1%	6.5%	3.3%	10.5%
Teachers within my department and/or grade-level team design instruction using the principles of Universal Design for Learning (UDL). (N = 785)	10.3%	25.5%	14.3%	6.2%	7.8%	4.1%	31.8%
Teachers within my department and/or grade-level team are effective at differentiating their instructional practices to meet a variety of student learning needs. (N = 787)	23.6%	34.4%	16.0%	8.1%	5.8%	2.7%	9.3%
Teachers consistently select and provide appropriate accommodations outlined in their students' IEP (e.g., chunking of assignments, sitting up front). (N = 786)	24.8%	39.4%	14.9%	6.4%	2.9%	2.5%	9.0%
Teachers effectively utilize assistive technology (e.g., screen readers, speech-to-text) to enhance learning and access for SWD. (N = 786)	13.4%	34.4%	20.4%	9.4%	4.1%	2.5%	15.9%
The District supports the effective implementation of the co-teach instructional model through on-going professional development and job-	5.6%	16.1%	12.4%	11.2%	12.9%	12.2%	29.6%

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Statement	Strongly Agree	Agree	Slightly Agree	Slightly Disagree	Disagree	Strongly Disagree	Don't Know
embedded supports for co-teach partners. (N = 788)							
My school's master schedule allows for weekly, structured collaboration time for co-teach partners. (N = 788)	8.9%	14.8%	9.5%	8.4%	14.6%	20.7%	23.1%
The co-teach instructional model is well-implemented at my school. (N = 787)	4.8%	15.5%	9.8%	11.2%	15.2%	15.0%	28.5%
Therapy and other related services are scheduled and provided to students in an efficient manner. (N = 786)	17.3%	33.3%	16.2%	7.6%	6.4%	3.6%	15.6%
Case managers ensure that students' IEP services are provided. (N = 790)	25.4%	38.1%	12.9%	4.3%	1.6%	2.0%	15.6%
There is an efficient process for tracking the provision of services to SWD who are eligible for Medicaid. (N = 789)	8.5%	18.0%	5.1%	2.8%	2.5%	2.7%	60.5%
I have access to the Behavior Intervention Plans (BIPs) for SWD in my classroom. (N = 789)	18.6%	35.7%	6.6%	4.7%	5.6%	3.5%	25.2%
There are consistent processes for progress monitoring student behavior. (N = 789)	9.9%	25.3%	15.8%	11.0%	17.0%	8.2%	12.7%
Campus administrators at my school follow a consistent process for administering discretionary disciplinary referrals. (N = 790)	9.4%	22.9%	11.5%	10.8%	13.7%	14.6%	17.2%
The District ensures that the professional learning needs of all teachers and staff who support SWD are addressed. (N = 788)	6.5%	21.3%	17.6%	16.1%	15.0%	12.6%	10.9%
The District provides adequate training on supporting SWD in the general education setting. (N = 790)	4.9%	18.9%	17.6%	18.0%	15.7%	13.9%	11.0%

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Statement	Strongly Agree	Agree	Slightly Agree	Slightly Disagree	Disagree	Strongly Disagree	Don't Know
Teachers new to the profession or new to teaching SWD receive additional, specialized support prior to or during their first year of teaching. (N = 790)	4.3%	12.5%	6.8%	10.0%	14.8%	15.6%	35.9%
The District provides high-quality professional learning related to special education and supporting students with disabilities. (N = 790)	6.3%	18.1%	18.1%	18.6%	14.9%	12.4%	11.5%
There are sufficient professional development options related to special education for my role (position). (N = 791)	4.6%	19.1%	16.4%	16.3%	22.9%	15.9%	4.8%
The professional development I have received related to special education is of high quality. (N = 791)	6.2%	23.4%	25.7%	13.4%	13.7%	8.3%	9.4%
I receive helpful feedback from my administrative team to reflect on and improve my instructional practices/job performance. (N = 791)	14.8%	37.3%	16.4%	8.6%	9.7%	8.0%	5.2%
I feel adequately prepared to teach or provide support services to SWD. (N = 790)	16.8%	37.3%	19.9%	10.0%	7.0%	3.9%	5.1%
Teachers within my department and/or grade-level team provide parents of SWD with educational information on how to help and support their child's learning and/or behavior at home. (N = 783)	13.2%	35.8%	17.4%	7.8%	5.7%	3.3%	16.9%
My campus provides ample opportunities to engage parents of SWD. (N = 781)	11.3%	32.9%	16.8%	12.4%	7.7%	3.6%	15.4%
Parents of SWD at my school are involved in their child's academic learning. (N = 780)	7.4%	27.9%	26.2%	14.2%	6.9%	2.7%	14.6%
Parents of SWD at my school are routinely involved in	14.3%	39.3%	20.1%	8.6%	3.1%	1.4%	13.2%

Statement	Strongly Agree	Agree	Slightly Agree	Slightly Disagree	Disagree	Strongly Disagree	Don't Know
decisions about how to address their child's individual learning needs. (N = 781)							

Source: Gibson Consulting Group

Appendix D – Key Terms

Below is a list of frequently used terms and definitions that are referenced throughout this report.[31]

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

- **Education Management Information System (EMIS)** - A statewide data collection system for Ohio's primary and secondary schools, including demographics, attendance records, course information, financial data, and test results.

- **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's disability prevents the student from being adequately or safely educated in the public schools without the provision of special services.

- **Evaluation Team Report (ETR)** – A report prepared by the IEP team that summarizes the child's educational needs and documents the determination of eligibility for special education.

- **Extended School Year (ESY)** - Special education and related services that are provided to a child with a disability beyond the normal school year of the school district, in accordance with the child's IEP and at no cost to the parent of the child.

- **Family Education Rights and Privacy Act (FERPA)** - A law that addresses privacy issues associated with students and education.

- **Functional Behavior Assessment (FBA)** – 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 over time.

- **Individuals with Disabilities Education Improvement Act (IDEIA)** – The Individuals with Disabilities Education Act (IDEA) is a law that makes available a free appropriate public education to eligible children with disabilities throughout the nation and ensures special education and related services to those children.

- **Individualized Education Program (IEP)** – A written legal contract developed, reviewed, and revised in a meeting of an IEP team to best identify the nature and extent of special education intervention strategies and related services that a school will provide for a child with a disability.

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[31] All definitions have been compiled by Gibson from a variety of online sources.

- **Least Restrictive Environment (LRE)** - Settings where children with and without disabilities are educated together as opposed to the most restrictive environments where children with disabilities are not educated with children who are non-disabled.

- **Multi-tiered System of Supports (MTSS**) – Is a framework many schools use to provide early interventions and targeted supports to struggling students. It screens all students and aims to address academic and behavior challenges.

- **Ohio Achievement Test (OAT)** - Required assessment that measures students on what they know and are able to do in mathematics, reading, science, social studies, and writing, with the administration to students from third to eighth grade (replaced Ohio's proficiency tests).

- **Ohio Department of Education (ODE)** - Ohio's state agency, governed by the State Board of Education, charged with developing and maintaining high standards and quality support for the state's educational system, from pre-kindergarten through adult education.

- **Office of Special Education Programs (OSEP)** - The U.S. Department of Education's office dedicated to improving results for infants, toddlers, children, and youth with disabilities ages birth through 21 by providing leadership and financial support to assist states and local districts.

- **Positive Behavioral Interventions and Supports (PBIS)** – An evidence-based three-tiered framework to improve and integrate all of the data, systems, and practices affecting student outcomes every day.

- **Positive Behavior Support (PBS)** – A term for affirmative actions that districts and buildings use to assist students with behaviors that interfere with learning.

- **Related Services** – Includes 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.

- **Special Education (SPED)** – Refers to special education program and services.

- **Specially Designed Instruction (SDI)** – Refers to designing instruction to fit the needs of a specific child; adaptations may be made in the content, methodology, or delivery of instruction.

- **State Performance Plan (SPP)** – Include indicators that measure child and family outcomes and other indicators that measure compliance with the requirements of the IDEA. LEAs are required to report data on 16 State Performance Plan Indicators (SPPIs) identified by the United States Department of Education's Office of Special Education Programs.

- **Students with Disabilities (SWD**) – Refers to students with a physical or mental impairment(s) that substantially limits major life activities.

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- **Title I** - A federally funded program that provides financial assistance through state or local education agencies and schools with high numbers or high percentages of poor children to help ensure that all children meet challenging state academic standards.