Haldane Central School District

Comprehensive Special Education Review

August 2023

PUBLIC CONSULTING GROUP

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Acknowledgments

The PCG team thanks the many individuals who contributed to this special education review for Haldane Central School District (HCSD). Their efforts were critical to our ability to obtain a broad and detailed understanding of the system so that we could present the best possible roadmap for improving special education and related services for HCSD's students. This review would not have been possible without the support of Superintendent of Schools Dr. Philip Benante, and Director of Pupil Personnel Services, Dr. Regina Kaishian, in addition to the Board of Education and other members of the leadership team and Department of Pupil Personnel Services staff.

The project team organized all components of the data collection efforts, provided all the documents and data we needed to do our work, and organized the logistics for our data collection activities. Their commitment to this review along with many other competing priorities was admirable.

PCG also thanks the many HCSD staff members with whom we met. Their commitment to the work they do for students each day was evident through their comments, and we appreciated their willingness to speak with us and welcome us into their schools and classrooms.

Public Consulting Group LLC

I. INTRODUCTION AND METHODOLOGY

Purpose of the Study

In November 2022, Haldane Central School District (HCSD) engaged with Public Consulting Group LLC (PCG) to conduct an independent review of its special education services. This report describes the current state of the special education program in HCSD and is designed to guide the District toward continuous improvement.

The study examined the following guiding questions:

- **Curriculum and Instruction**
    - To what extent does HCSD implement a rigorous process to systematically monitor the educational benefit of special education services to students?
    - Is there a consistent "golden thread", or supporting body of evidence, that connects the existence of a student's disability with Present Level of Academic Achievement and Functional Performance statement, identified learner characteristics, inclusion needs, and selected accommodations for instruction and assessment?
    - How do Individualized Education Program (IEP) teams determine services and placement?
- **Systems and Structures**
    - How is the district's continuum of services organized? To what degree do students with disabilities have access to general education curriculum? How are inclusive practices employed?
    - What variations exist between the elementary school, the middle school, and the high school regarding service delivery and documentation? To what extent are individual schools meeting compliance and outcomes requirements?
    - To what extent does HCSD meet federal and state compliance regulations?
    - How has HCSD's school and district leadership fostered a culture that is focused on improving outcomes and post-secondary preparation?
- **Family and Community Engagement**
    - What are the strengths and opportunities for improvement with respect to the district's Learning Differences Committee and partnership with the school district?
- **Budget and Staffing**
    - What are the cost drivers of the district's special education budget? Where have there been notable changes over the past three school years?
    - How does the district's expenditures for students with IEPs, per pupil, compare with peer districts?
    - How does the district staff its special education programs at the elementary school, the middle school, and the high school?

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

Methodology

Over the course of the 2022-23 school year, PCG conducted a mixed-methods study of the special education program in HCSD. The findings and recommendations related to programs, policies, and practices resulted from a comprehensive analysis of several data sources. Sources included **1) Data and Document Analysis, 2) Organizational Focus Groups and Interviews and Student File Review Focus**

Groups, 3) a Staff Survey and a Parent Survey, and 4) Classroom Observations. These components were drawn from **Research and Practice Literature** to inform the findings and recommendations. PCG used publicly available achievement and financial information to compare key HCSD statistics against local district, state, and national data. The method and sources of data are triangulated to increase the validity of the conclusions, in this case, regarding program implementation, identification of gaps, and recommendations for the continued improvement of HCSD's special education programs and continuum of services.

Details of each data source are included below.

Data and Document Analysis

Population Trends, Programs, and Achievement and Outcomes Analysis

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

Document Review

PCG analyzed over 22 documents for information related to District and school structures, programs, policies, and practices. The documents were coded for themes that aligned to the focus group and interview findings. Documents reviewed were in the following general categories:

- Organizational structure, staffing, and resource allocation
- Description of programs, services, interventions, and activities
- Documents related to curriculum, instruction, and professional development
- District procedures and guides
- Fiscal information

Focus Groups

In January 2023, PCG conducted two types of in-person focus groups: 1) organizational focus groups/interviews and 2) student file review focus groups. Narrative data from the organizational focus groups and interviews were analyzed using qualitative data analysis methods. Specifically, a two-cycle coding methodology was implemented to identify "themes" and "sub-themes" from the data. Additionally, the file review focus group narrative was analyzed to identify strengths and areas of improvement within HCSD's current practices for IEP development and implementation. Within this report, no focus group or interview participants are personally referred to or quoted directly, although position titles are referenced in some cases, when necessary, for contextual reasons. These data were coded for themes.

Organizational Focus Groups and Interviews

To gain an understanding of how special education programs operate broadly within the District, organizational focus groups and interviews were designed to include a range of stakeholders. These focus groups included a variety of central office staff, school-based staff, and family participants. PCG worked closely with HCSD to determine the best outreach and communication methods for focus group and interview participation.

Focus groups generally consisted of between three and ten participants, while interviews ranged from one to three participants. Except in rare circumstances, supervisors did not participate in the same focus group or interview sessions with their staff members to give all staff an opportunity to speak candidly and honestly. PCG provided a sample schedule and a list of positions required to participate. In total, PCG held 12 focus groups and interviews, with over 45 stakeholders participating.

Student File Review Focus Groups

PCG also conducted student-centered file review focus groups that allowed for conversation about school-based practices and included a review of a variety of student documents, specifically eligibility documentation, IEPs, and student progress reports. Through this record review, PCG focused on several topics related to special education management, student identification, programs and services, curriculum and instruction, staffing, and parent engagement, while addressing specific process questions about the development of IEPs, their implementation, and documentation. Student records were selected at random by PCG and included a wide cross-section of schools, ages, gender, and disability categories. HCSD staff provided access to the relevant documents associated with the selected students, including the most recent evaluation, IEP, and progress report, and provided copies for discussion via the district's internal data sharing system. Several student records were discussed during each focus group session.

Participants included special education teachers and related service providers. Each group consisted of approximately three to four participants. To ensure adequate participation in each group, the Director of Pupil Personnel Services worked with the school-based leadership to select special education staff for participation. Focus groups were held during the school day. In total, PCG held two student file review focus groups.

Staff and Parent Surveys

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

Survey Items

Survey items were drawn from the research and practice literature in special education and clustered to acquire data from each stakeholder group regarding the extent to which these groups perceived that policies and practices shown in the literature to support effective programming, parent involvement, and positive results for students with disabilities were evident in HCSD.

The Department of Pupil Personnel Services (DSS) reviewed the survey items to verify their relevance and to add items where appropriate. The survey incorporated five-point rating scales, yes/no questions, and included open-ended text areas. For reporting purposes, the five-point rating scale was consolidated into three categories: agree (which includes strongly agree and agree), disagree (which includes strongly disagree and disagree), and don't know or not applicable (where this option was provided to respondents).

Survey Process

PCG worked collaboratively with the PSS to facilitate a survey process that would result in the highest possible rate of return. To encourage participation, all parents of students with an IEP were informed of the purpose of the survey and provided with instructions for accessing the survey via email. Reminder emails were sent to parents. The survey was translated into Spanish. All staff were sent an email invitation to participate in the survey and were sent reminder emails to participate.

A total of 34 parents who received the online survey completed it. A total of 59 staff responded to the online staff survey.

Survey Analysis

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

Classroom Observations

In January 2023, PCG conducted classroom observations in all three HCSD schools, visiting approximately four to six classrooms at each school. PCG requested a list of classrooms in which there were students

with IEPs and the level, subject area, and placement designation. The intent was to ensure that all placement settings were represented. PCG used a combination of random and purposeful sampling to assure that there was an overall representation of classrooms across the District.[1]

PCG's School Observation protocol was designed to collect qualitative information about the school building as a whole and in individual classrooms. It focused on three key areas: 1) Safe and Accessible Environment, 2) Functions and Elements of Explicit Instruction, and 3) Specially Designed Instruction. PCG observed all instructional/service delivery settings (e.g., co-taught classes, pull out support, special class) across a wide representation of grades. The overall school environment, including non-instructional spaces such as the lunchroom, office, and hallways, was also observed.

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

Study Limitations

The study had the following limitations:

- The circumstances presented by the COVID-19 pandemic over the past three school years have inevitably influenced instruction. Teachers' set of instructional tools and approaches are affected as students are not being educated during pre-pandemic school years. This must be recognized as having some influence on the overall school experience and on the discussion of current special education practices.
- Data collection for this report was conducted during the 2022-23 school year. This report represents a specific point in time.
- There are limitations in the demographic and outcome data analysis due to HCSD's small population size. In some instances, demographic data is suppressed to protect the identity of students and in other instances there are large variances in trend data that represents a small sample size.

PCG Foundational Approach

PCG's approach to its work with state, county, and district organizations is as a thought partner. That is, we act as an outside agent, with an objective perspective, who works alongside educational entities to identify challenges and provide recommendations for improvement.[2] We follow a mixed method Collaborative Program Evaluation model that is systematic, based upon qualitative and quantitative research methods, and produces credible and valid data that proactively informs program implementation, determines gaps, and offers recommendations for the continued improvement of the program. We value the importance of developing trust, open communication, and fostering collaboration between the review team and program staff.

Our philosophy for improving student outcomes in schools and districts is driven by the U.S. Department of Education's Results Driven Accountability (RDA) structure and rooted in our Special Education Effectiveness Domains framework.

Results Driven Accountability

The Individuals with Disabilities Education Act (IDEA) is a federal law that makes available a free appropriate public education (FAPE) to eligible children with disabilities throughout the nation and ensures special education and related services to those children. The IDEA governs how states and public agencies

[1] This is often characterized as Heterogeneity Samples or Maximum Variation Samples.
[2] https://www.publicconsultinggroup.com/media/1272/pcg_collaborative_evaluation.pdf

provide early intervention, special education, and related services to more than 6.5 million eligible infants, toddlers, children, and youth with disabilities and requires that each public school provide services to eligible students in the least restrictive environment (LRE) and in accordance with each student's IEP.

In the law, Congress states:

> *Disability is a natural part of the human experience and in no way diminishes the right of individuals to participate in or contribute to society. Improving educational results for children with disabilities is an essential element of our national policy of ensuring equality of opportunity, full participation, independent living, and economic self-sufficiency for individuals with disabilities.*[3]

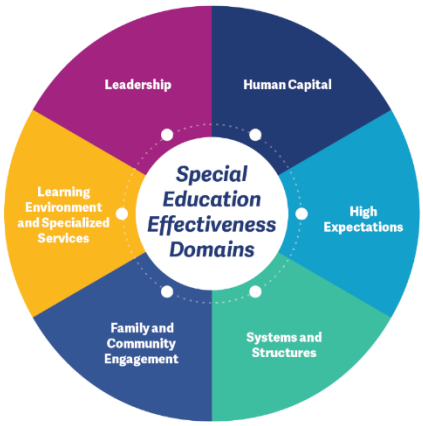
One purpose of IDEA is to assess and ensure the effectiveness of efforts to educate children with disabilities. This is done through accountability measures established by both the federal Office of Special Education Programs (OSEP) and state special education agencies and, at times, special education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

While compliance indicators remain important, under the RDA framework, OSEP has sharpened its focus on what happens in the classroom to promote educational benefits and improve outcomes and results for students with disabilities.[4] This change was based on data showing that the educational outcomes of America's children and youth with disabilities have not improved as expected, despite significant federal efforts to close achievement gaps. The accountability system that existed prior to the new one placed substantial emphasis on procedural compliance, but it often did not consider how requirements affected the learning outcomes of students.[5] This shift is having a great impact in guiding the priorities of Department of Pupil Personnel Services nationwide, including in HCSD. Districts nationwide need to raise the level of and access to rigor in the classroom and generate a culture of academic optimism.[6]

These issues became even more significant with the March 22, 2017, U.S. Supreme Court decision in *Endrew F. v. Douglas County School District*. In this decision, the Court updated its prior standard for determining a school district's provision of an appropriate education for students with disabilities. This case centered on the importance of establishing ambitious and challenging goals that enable each student to make academic progress and functional advancement and advance from grade to grade. Progress for a student with a disability, including those receiving instruction based on alternate academic achievement standards, must be appropriate in light of his/her circumstances. Furthermore, yearly progress must be more demanding than the "merely more than de minimis" standards that had been used by some lower courts. The Court made it clear that IDEA demands more. In *Endrew*, the Supreme Court reached a balance between the standard established by the 10th Circuit and other circuits (more than de minimis) and the higher standard promoted by Endrew's parents (goal of providing students with disabilities opportunities to achieve academic success, attain self-sufficiency, and contribute to society that are substantially equal to the opportunities afforded children without disabilities). The *Endrew* decision's most significant impact in the classroom can be seen in: (1) the design and development of rigorous Individualized Education Programs (IEPs); (2) the implementation of students' IEPs with fidelity; and (3) increased progress monitoring of IEP goals.

[3] https://sites.ed.gov/idea/about-idea/
[4] Supreme Court of the United States. Retrieved from https://www.supremecourt.gov/opinions/16pdf/15-827_0pm1.pdf
[5] April 5, 2012, RDA Summary, U.S. Department of Education. www2.ed.gov/about/offices/list/osers/osep/rdasummary.doc
[6] Hoy, W. K., Tarter, C. J., & Woolfolk Hoy, A. (2006). Academic optimism of schools: A force for student achievement. Working Paper. The Ohio State University. http://www.waynekhoy.com/school-academic-optimism/

Special Education Effectiveness Domains



Building on extensive research and our collective experience and expertise serving school districts and state departments of education nationwide, PCG has developed this Special Education Effectiveness Framework to assist school districts in catalyzing conversations about, and reviewing and improving the quality of, their special education programs.[7] It is designed to provide school district leaders with a set of practices to strengthen special education services and supports, to highlight the multidisciplinary, integrated nature of systemic improvement, and to clearly establish a pathway for districts to move toward realizing both compliance and results. An intentional focus on improving outcomes for students with disabilities leads to improved outcomes for ALL students.

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

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

Terminology

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

Committee on Preschool Special Education (CPSE). The CPSE is a multidisciplinary team appointed by the school board to determine eligibility and the appropriate level of services for preschool children ages 3-5 years old. The CPSE conducts meetings to develop, review, or revise the Individualized Education Program (IEP) of a preschool student with a disability.

Committee on Special Education (CSE). The CSE is a multidisciplinary team appointed by the Board of Education. The CSE is authorized to identify students in need of services by determining eligibility, developing an Individualized Education Program (IEP), placing the student in the least restrictive environment in which they can succeed and provide appropriate services to meet the child's educational needs. The team meets at least annually to review a child's IEP and determine programming from that point forward.

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

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

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

Students Receiving Special Education Services. References are made to students receiving special education services. They will also be referred to as students with Individualized Education Programs (IEPs)

[7] https://publicconsultinggroup.com/media/3347/special-education-effectiveness-framework_policy-paper.pdf

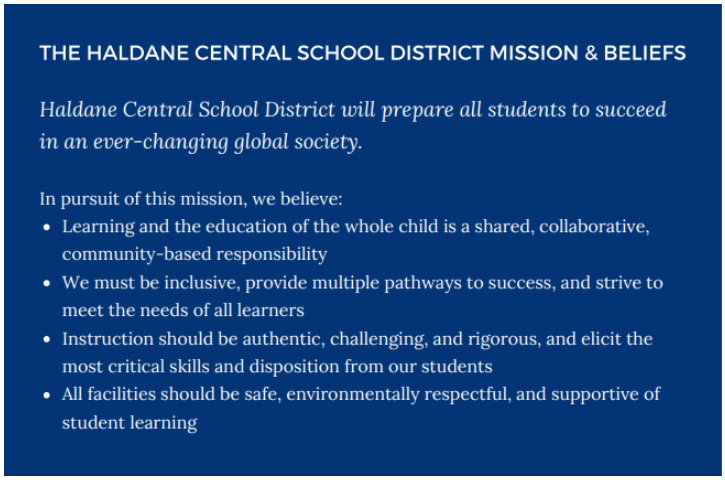
or students with disabilities (SWDs). The terms are intended to be interchangeable. This categorization does not include students with disabilities who have 504 Plans.

Teaching Assistant or Aide. The terms Teaching Assistant and Aide are used throughout the report to describe aides who support the academic and/or behavioral needs of students with disabilities. These terms are interchangeable.

II. EXECUTIVE SUMMARY

Haldane Central School District (HCSD), located in the lower Hudson Valley, overlooking the Hudson River in the historic Village of Cold Spring, is part of a thriving community. The surrounding community is described as both tight-knit and vibrant. HCSD is regarded as having an "outstanding academic reputation" and "the campus environment, coupled with small class sizes, create a strong sense of connection among HCSD's faculty, staff, students, and their families, and the surrounding community."[8] The district reported a K-12 enrollment of 788 students: 100 students with disabilities (13%), 144 students identified as economically disadvantaged (18%), and 15 students identified as English Language Learners (2%).[9] The majority of the student population is identified as White (82%) followed by Hispanic or Latino (10%), Asian or Native Hawaiian/Other Pacific Islander (4%), Black or African American (2%), and Multiracial (2%).[10] Over the past several years, the district has experienced shifts in the diversity of the student body as well as administration changes. District leadership initiated the development of a Strategic Coherence Plan in response to the evolving landscape of HCSD.

The HCSD Strategic Coherence Planning Team aimed to answer the following questions regarding how K-12 teaching and classroom experiences facilitate the practice of the district's most important student skills and attributes:[11]



1. How is the district measuring its success and using that K-12 data to create accountability and continuous improvement of student performance in those areas?
2. How do budgets and education plans ensure that all K-12 work is designed to increase the number of children who leave school ready to perform and succeed at a high level?
3. What are the most important tasks that we must undertake to ensure that all our systems are aligned for student success?

The Haldane Essentials were established by the planning committee as a foundation for the Strategic Coherence Plan.[12] The six Haldane Essentials include: Critical Thinking, Problem Solving, Communication, Growth Mindset, Emotional Intelligence, and Wellness.[13] The coherence planning process followed four key phases resulting in five strategies focused on improving outcomes for all students in HCSD:[14]

Strategy One: Create a system that ensures the ongoing development and implementation of vertically and horizontally aligned curriculum that supports the attainment of The Haldane Essentials

Strategy Two: Design and implement a professional learning plan that purposefully enhances the faculty and staff's capacity to support The Haldane Essentials.

Strategy Three: Align and connect all goal-setting processes so they systemically support the District's Mission, Beliefs, and the attainment of The Haldane Essentials.

[8] Haldane Central School District Strategic Coherence Plan, March 2020
[9] https://data.nysed.gov/enrollment.php?year=2021&instid=800000039703
[10] id.
[11] Haldane Central School District Strategic Coherence Plan, March 2020
[12] id.
[13] id.
[14] id.

Strategy Four: Ensure that all students, including those from historically underserved or vulnerable populations, have high expectations for success and equitable access to opportunities to learn.

Strategy Five: Enhance communication with stakeholders regarding the District's Mission, Beliefs, and The Haldane Essentials.

PCG was contracted to provide an objective view of the special education program in HCSD and has identified both strengths and areas of improvement, or root causes, that require focus in the coming years. These root causes emerged from our analysis of data we collected and are discussed in detail in this report. While these root causes will require significant attention, the recommendations at the conclusion of this report serve as a roadmap to address them, leading to the future growth of the special education program and a path to help HCSD to create the world-class services we know it desires.

Preliminary Findings

Throughout the course of this report, we have analyzed the complex, often interconnected root causes that have limited the achievement of students with disabilities and highlighted areas in which the district either needs to accelerate its efforts or change course. Similar to the priorities identified in the Strategic Coherence Plan set forth by district leadership, our focus has been grounded in increasing equity and access for students with disabilities in order to drive improvements in academic and functional outcomes.

Although HCSD recognizes the need to strengthen systems to ensure student academic success, especially for students with disabilities, it faces challenges in five key areas. These areas are supported by evidence throughout this report and serve as the basis for the recommendations provided at the end of this report.

1) Expanding the least restrictive environment (LRE) continuum and increasing variety of instructional models

Parents, HCSD leadership, and staff all echoed the importance of students with disabilities remaining part of their homeschool community; however, the current triad of primary instructional models (Integrated Co-Teaching, Resource Room, and Special Class) limit each schools ability to serve the students in their building. HCSD must consider how expanding more specialized classroom opportunities for students with more complex disabilities can be implemented to promote students remaining in their home schools and connected with their non-disabled peers. Presently, the district is incurring costs to fund out of district placements. Once a more expansive LRE continuum is created, HCSD students will have an increased opportunity to remain in the district with siblings, neighborhood friends, and peers.

2) Implementing high-leverage special education and evidence-based practices with fidelity

HCSD, as a district, meets the State Performance Plan (SPP) target for students with disabilities spending more than 80 percent of the time in a general education setting. However, students with disabilities continue to demonstrate considerably poorer outcomes when compared to their HCSD peers without disabilities despite consistent access to instruction provided in the general education environment alongside non-disabled peers. Students with disabilities having a "seat" in the general education classroom is only one part of driving academic improvement.

When used together, high-leverage practices (HLPs) and evidence-based practices (EBPs) can be powerful tools for improving student outcomes. Special education teachers must be flexible problem solvers who not only have expertise in using highly effective practices, but also are proficient in understanding, implementing, and monitoring evidence-based practices with individual students and making decisions regarding changes in practice as needed. HCSD has the opportunity to change the educational trajectory for students with disabilities by adopting and standardizing research-backed practices.

3) Creating a district-wide vision and guidance for special education

The experiences of students with disabilities and special education staff vary across schools throughout HCSD. Inconsistencies in practice and the lack of documented "how to" special education processes guidance is a challenge. The long-standing tenure of district staff and limited formal policy guidance and special education vision has evolved into campus-based teams operating from a "historical" perspective as opposed to a unified approach to special education service provision, particularly for assessment and evaluation. Special education instructional investment has occurred at the central office level, including the development of a mission statement. The connective tissue between the district's special education mission, the draft special education plan, and daily practices continues to grow. A goal of well-developed special education policies is to ensure that students with disabilities have comparable educational experiences regardless of campus enrollment.

In summary, the investments made throughout the district to support the accelerated growth of all students, particularly students with disabilities, cannot be underscored enough. HCSD staff at the campus and central office levels have weathered the COVID-19 pandemic and the significant effects it has had on student learning outcomes district-wide. As HCSD transitions into this new era of instruction, it is critical that systems change and management evolve with greater accountability and consistency during implementation.

PCG believes that HCSD has many strengths on which to build and can achieve high-quality programming for all students, especially those with disabilities, that we know it seeks. The Superintendent and HCSD senior leadership have expressed commitment to making the changes necessary. The arrival of a seasoned and well-respected Director of Pupil Personnel Services is a catalyst for change in creating positive outcomes for students with disabilities. Initiating this kind of change requires attention, a strong vision from the Superintendent and Board of Education that is enacted by senior leadership staff, an appropriate allocation of resources, mandated professional learning, and expectations for all serving students with disabilities. PCG strongly encourages HCSD to develop a bold, creative, and transparent implementation plan to which it will hold itself accountable, and that is informed by input from a wide range of community stakeholders. Doing so will position HCSD for its upward trajectory for years to come.

III. STATE PERFORMANCE PLAN (SPP) AND RESULTS DRIVEN ACCOUNTABILITY (RDA) RESULTS

Strengths

- **Educational Setting.** HCSD educates students with disabilities 80 percent or more of the day in the general education setting at rates higher than the state target**.**
- **Graduation Rate.** HCSD's 100% four-year graduation rates for students with disabilities meets or exceeds the state rate for students with disabilities and those without for the past two years.

Opportunities for Improvement

- **Achievement outcomes.** The district's proficiency rates for students with disabilities in ELA and math are significantly lower than those of their nondisabled peers.
- **Risk Ratios for Overidentification.** HCSD exceeds the 2.5 threshold for Hispanic students identified under the disability category of speech/language (3.20) and of other health impairment (2.82).
- **Risk Ratios for Educational Setting.** HCSD exceeds the 2.5 threshold for Hispanic students educated 40-79% of their time in the general education setting (2.67).
- **Educational Setting.** HCSD students are educated in separate settings at a higher rate than the state target.

The New York State Education Department (NYSED), Office of Special Education (OSE) is required by the United States Department of Education (USDE), Office of Special Education Programs (OSEP) to make determinations annually regarding the performance of students with disabilities for each local preschool and special education program using one of the following four determination categories: "Meets Requirements," "Needs Assistance," "Needs Intervention," or "Needs Substantial Intervention."[15] The NYSED uses a results-based rubric for indicators to evaluate the performance of each local education agency (LEA) in meeting the State's identified targets. The indicators evaluated are shown in the graphic to the left.

IDEA Part B Indicators

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

For the 2020-21 school year, HCSD received a Results Driven Accountability (RDA) determination of "Meets Requirements" and met or exceeded the state target across most indicators.

It is important to note that while this accolade for meeting IDEA requirements is to be celebrated and not one all districts or states achieve, there are limitations to these data. For one, the targets set by states often are a reflection of minimum acceptable levels for each indicator. Further, they reflect aggregate data, which could, for example, mask problematic trends in certain schools. Finally, these data are generally two years old and reflect one point in time. The analysis below provides HCSD with more recent data trends and can be used in a formative and directional capacity.

A variety of data sources were used to compile the charts in this chapter. They include:

- Some district and state data obtained from NYSED School Report Card[16]
- National data obtained from the National Center for Education Statistics Digest of Education Statistics and OSEP's Grads360 site[17]

[15] 34 CFR §§300.600 and 300.604
[16] http://data.nysed.gov
[17] https://nces.ed.gov/programs/digest/; https://osep.grads360.org/services/PDCService.svc/GetPDCDocumentFile?fileId=38707

- HCSD and State incidence data obtained from SEDCAR[18]
- 2022-23 District data obtained from HCSD in 2023

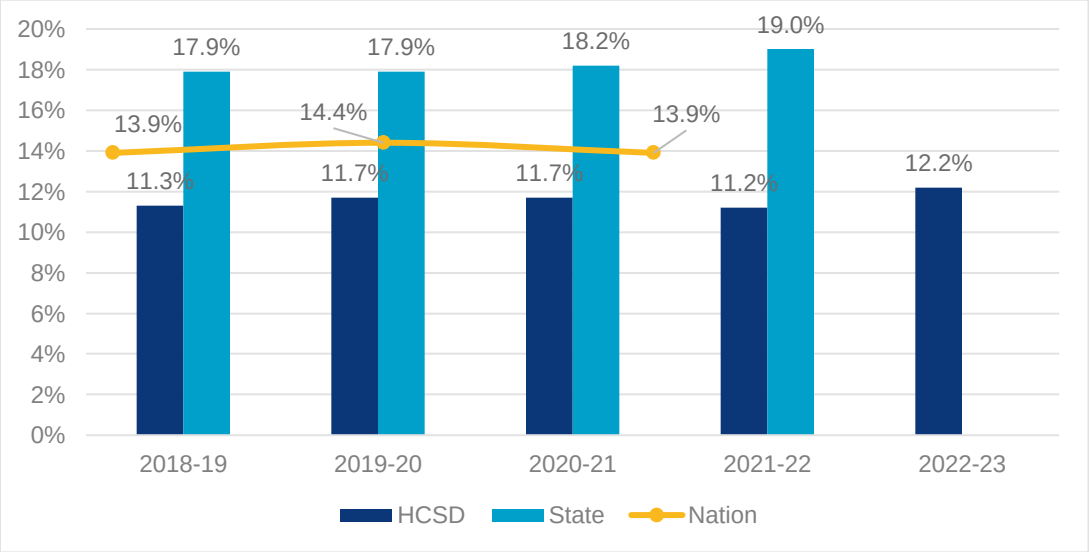
HCSD Special Education Demographics

The following section provides detail on various demographic data for students receiving special education services in HCSD.

As reflected in the figure below, between 2018-19 and 2021-22, the percentage of HCSD students with IEPs ages 6 through 21 was between 11.2 percent and 11.7 percent. In 2022-23, the percentage of students with disabilities increased to 12.2 percent. These rates have trended below the statewide and national averages for these four comparable years.

The last national data from 2020-21 reported that 13.9 percent of all public-school students had an IEP, a rate that was somewhat higher than HCSD, however lower than the state average.

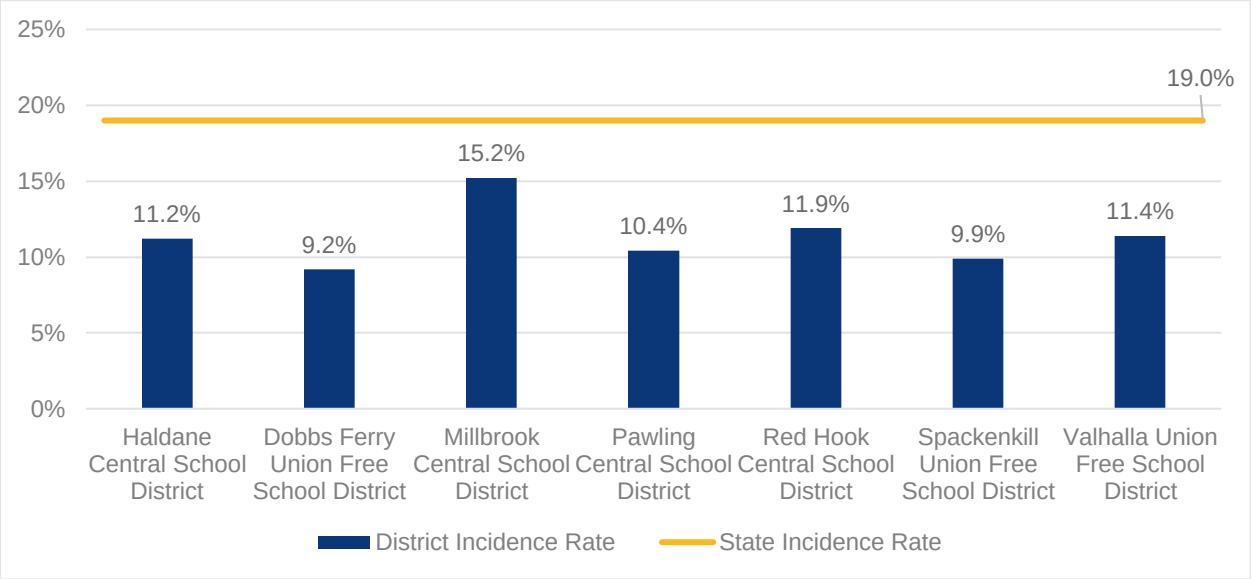
Exhibit 1. Percentage of HCSD Students with IEPs Compared to State and Nation, 2018-19 and 2022-23



HCSD provided a list of six New York school districts to compare incidence rate and outcome data for students with disabilities. Of the districts provided, Dobbs Ferry had the lowest incidence rate (9.2 percent). This was slightly lower than HCSD's identification rate of 11.2 percent. All of the comparable districts had identification rates below the state average of 19.0 percent. Millbrook Central School District had the highest incidence rate (15.2 percent).

[18] https://www.p12.nysed.gov/sedcar/state.htm

Exhibit 2. HCSD IEP Rates Compared to Other New York School Districts and State (ages 6-21), 2021-22

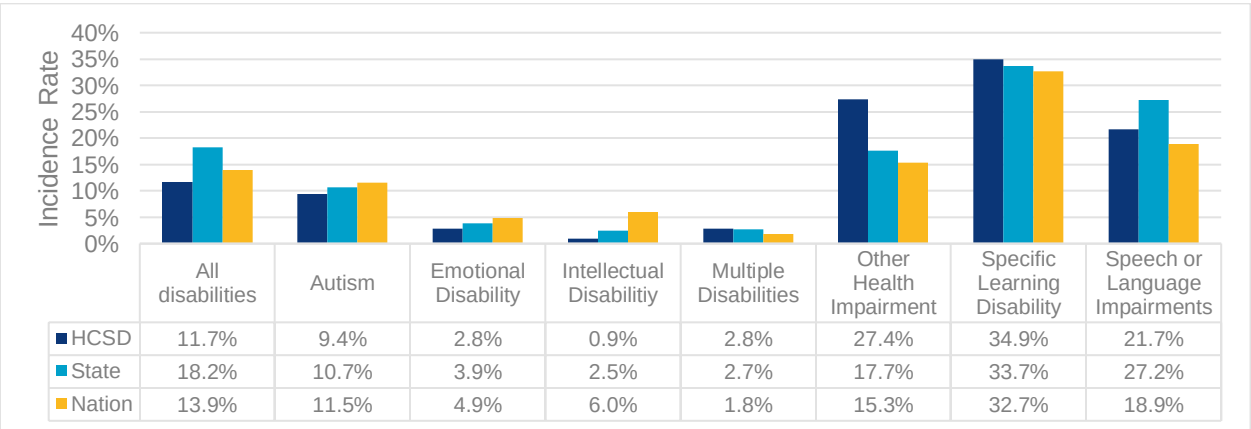


School-Aged Students: Identification, Achievement & Placement

Identification by Disability Category: District, State, and Nation

When compared to the state and nation, HCSD had higher rates of students identified with a health impairment (27.4 percent), than the state (17.7 percent) and nation (15.3 percent). This was also true for students identified with a specific learning disability (SLD), 34.9 percent than the state (33.7 percent) and nation (32.7 percent). The percentage of HCSD students identified with a speech or language impairment (21.7 percent) was lower than the state average (27.2 percent), but slightly higher than the nation average (18.9 percent).

Exhibit 3. Composition of Identified Students by Disability Category for HCSD, State, and Nation

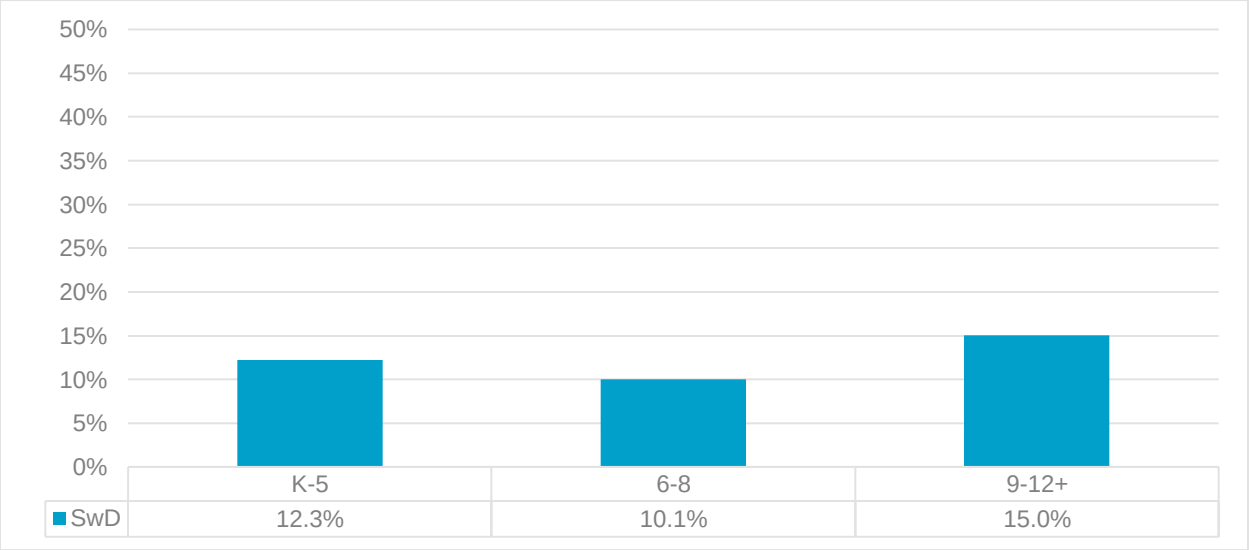


	All disabilities	Autism	Emotional Disability	Intellectual Disabilitiy	Multiple Disabilities	Other Health Impairment	Specific Learning Disability	Speech or Language Impairments
HCSD	11.7%	9.4%	2.8%	0.9%	2.8%	27.4%	34.9%	21.7%
State	18.2%	10.7%	3.9%	2.5%	2.7%	17.7%	33.7%	27.2%
Nation	13.9%	11.5%	4.9%	6.0%	1.8%	15.3%	32.7%	18.9%

Identification by Grade

The exhibit below displays the composition of all identified students by school level. These data show the highest number of students with IEPs at the high school (46).

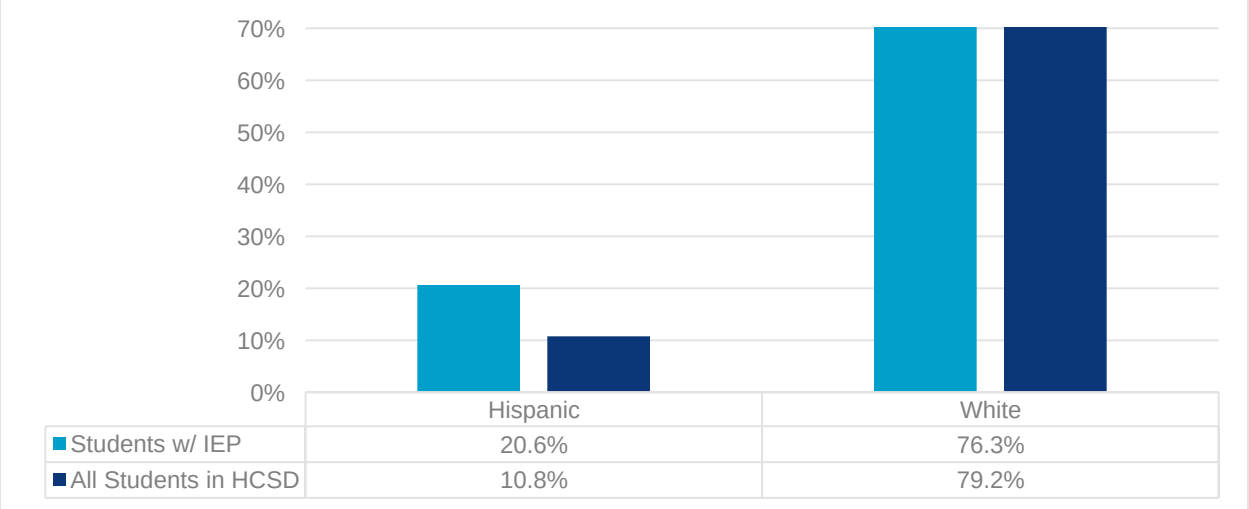
Exhibit 4. Percent of Students with IEPs by Grade, 2022-23



Identification by Race/ Ethnicity

The exhibit below shows the composition of each racial/ethnic group of identified students based on associated total enrollments for each group. Of the students identified with an IEP, 76.3 percent were white and 20.6 percent were Hispanic, higher than the percentage of students identified as Hispanic in the District (10.8%).

Exhibit 5. Percent of HCSD Students with IEPs (ages 6-21) by Race/Ethnicity, 2022-23.[19]

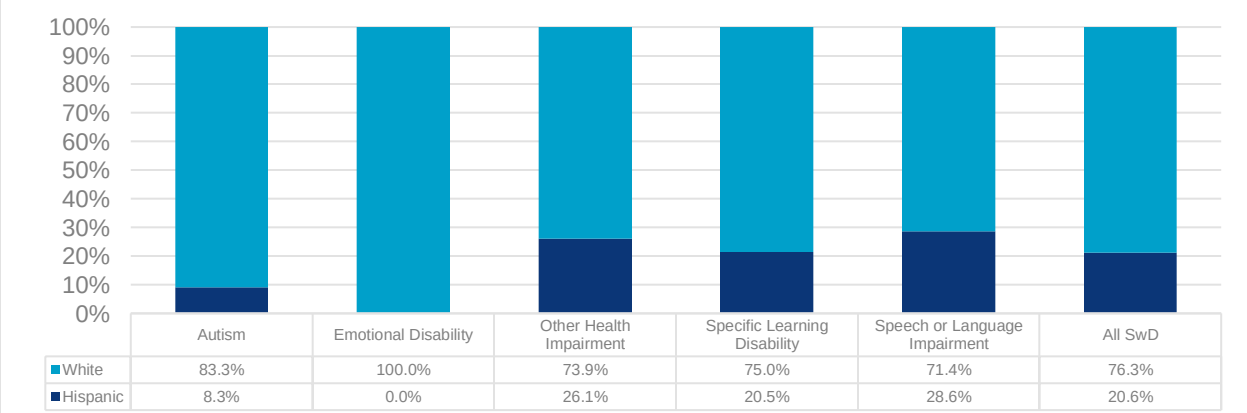


The exhibit below compares the percentage of students with an IEP by disability category and race/ethnicity. Data indicated the prevalence of disability types mostly aligned with District demographics, with variations in some disability categories. Key differences, displayed in the graph below include:

[19] Students in the following race/ethnicity categories accounted for 3.1 percent of students with IEPs: Asian and Black or African American.

- While Hispanic students accounted for 20.6 percent of students with IEPs, this group represented 28.6 percent of students with a speech or language impairment and 26.1 percent of students with a health impairment.
- White students accounted for 83.3 percent of students with Autism, higher than the overall percentage of students in this group with a disability (76.3 percent).

Exhibit 6. Percentage of HCSD Students (ages 6-21) by Disability Category and Race/Ethnicity



	Autism	Emotional Disability	Other Health Impairment	Specific Learning Disability	Speech or Language Impairment	All SwD
White	83.3%	100.0%	73.9%	75.0%	71.4%	76.3%
Hispanic	8.3%	0.0%	26.1%	20.5%	28.6%	20.6%

Risk Ratio for Identified Students by Race/Ethnicity and Disability

One of the most useful, informative, and proactive methods used to calculate disproportionality "is the risk ratio, which compares one racial/ethnic group's risk of receiving special education and related services to that of all other students."[20] The risk ratio can be used to calculate disproportionality at both the state and district levels. The analysis below is intended to provide HCSD with a tool to calculate risk ratios in order to monitor trends and identify areas of concern.

The risk ratio tool tells school personnel how the risk for one racial/ethnic group compares to the risk for a comparison group.[21] It can be used to assess:

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

As a concept, "risk" looks at the general enrollment data for each racial group along with the number of students from that group who were identified for a specified category and calculates the likelihood that a student from that racial group would be found in that particular category. The general risk equation is as follows:[22]

[20] Bollmer, J. Bethel, et al. (2007). Using the Risk Ratio to Assess Racial/Ethnic Disproportionality in Special Education at the School-District Level. The Journal of Special Education, Vol 41, Issue 3, pp. 186 – 198.
[21] Racial and Ethnic Disparities in Special Education: A Multi-Year Disproportionality Analysis by State, Analysis Category, and Race/Ethnicity, Office of Special Education and Rehabilitative Services, U.S. Department of Education, February 2016.
[22] PCG analyzed student populations with at least 10 students in a particular race/ethnicity group and at least 5 students with a specific disability classification.

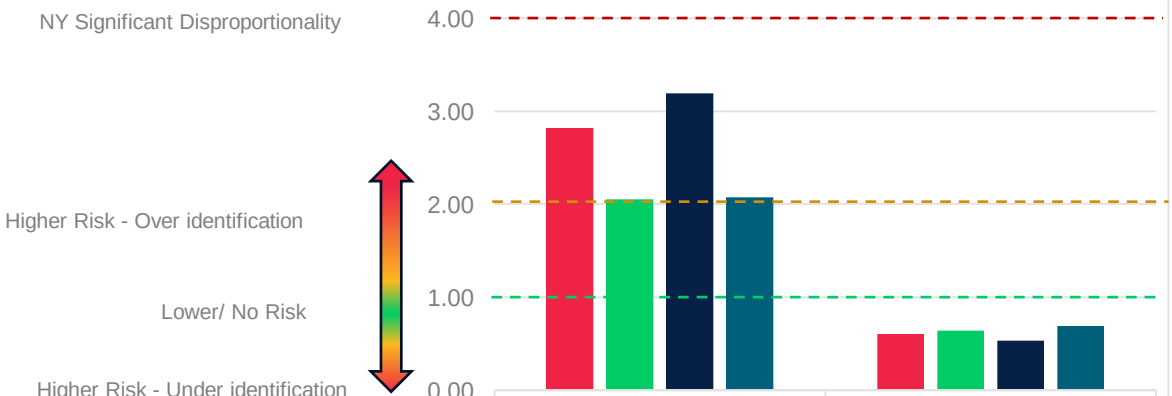
$$\text{Risk} = \frac{\text{Number of children from racial/ethnic group in disability category}}{\text{Number of enrolled children from racial/ethnic group}} \times 100$$

As shown below, a risk ratio greater than 2.0 or a racial/ethnic group indicates a higher risk of over-representation, while a risk ratio of less than 1.0 indicates a higher risk of under-representation. For the state of New York, the threshold for identification of significant disproportionality is 2.5. If the district meets that rate, then the state applies a 4.0 threshold for students of a specific race/ethnicity and disability classification.[23]

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

As the exhibit below shows, Hispanic students are twice as likely to be identified with a disability compared to other students in the district. Hispanic students were three times as likely to be identified with a speech or language impairment, and close to three times as likely to be identified as having a health impairment. HCSD should continue to monitor data to ensure continued compliance with disproportionality thresholds. While this does not meet the 2.0 risk ratio identified as significantly disproportionate, this is an area to closely examine within HCSD as the district is very close to meeting the threshold in this area.

Exhibit 7. Risk Ratios by Race/Ethnicity and Disability, 2022-23



	Hispanic	White
Other Health Impairment	2.82	0.61
Specific Learning Disability	2.05	0.64
Speech/ Language Impairment	3.20	0.53
SwD	2.08	0.69

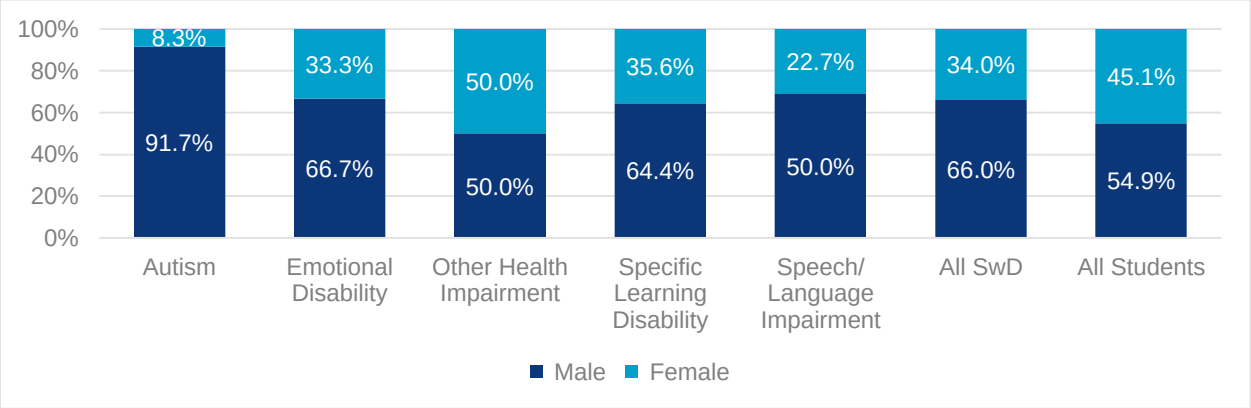
[23] 2020-21 Criteria for Notification of Disproportionality: https://www.p12.nysed.gov/sedcar/forms/instructions/spp_criteria/sigdispro2021.html

Identification by Gender

Of all HCSD students, 54.9 percent were male, and 45.1 percent were female. Of all students with IEPs, 66 percent were male, and 34 percent were female.

Of the students with Autism, 91.7 percent were male. This percentage was higher than district percentage of male students with an IEP. Female students accounted for 50 percent of students with a health impairment. This percentage was higher than the district percentage of female students with an IEP.

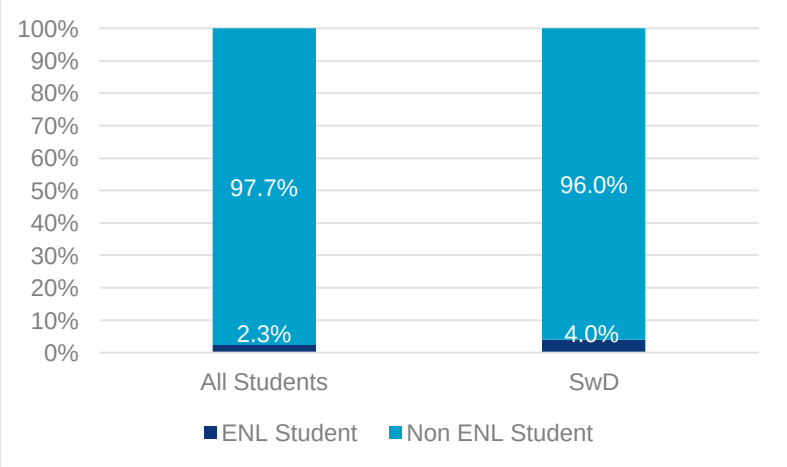
Exhibit 8. Percentage of HCSD Students with Disabilities by Gender and Disability, 2022-23



Identification by English as a New Language (ENL) Status

In 2022-23, 2.3 percent of students in HCSD were identified as an ENL student. Of the students with IEPs, 4.0 percent were identified as ENL.

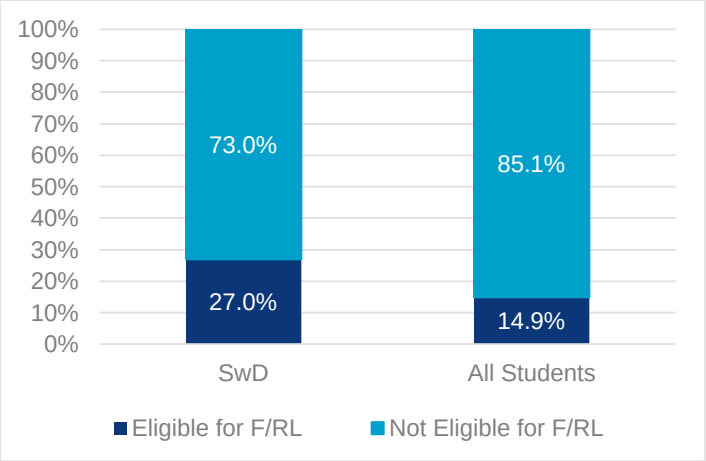
Exhibit 9. Percentage of HCSD Students with IEPs (ages 6-21) Identified as an English as a New Language (ENL) Student Compared to All Students, 2022-23



Identification by Free and Reduced Lunch Status

Overall, 14.9 percent of students in HCSD were eligible for free or reduced priced lunch. Of the students with an IEP, 27.0 percent were eligible.

Exhibit 10. Percentage of HCSD Students with Disabilities (ages 6-21) Enrolled by Free/Reduced Lunch Eligibility Compared to All Students, 2022-23



Achievement Outcomes

This section provides a longitudinal analysis of outcomes for school-aged students and those receiving special education based on the following: New York State assessments, graduation rates, and dropout rates.

New York State Assessment Outcomes

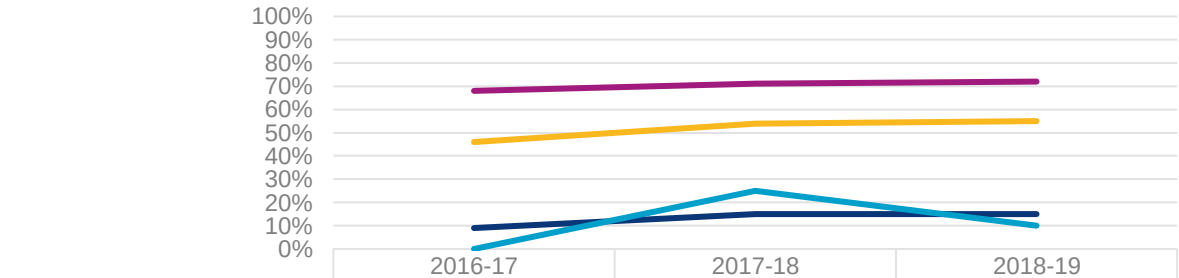
PCG analyzed outcomes on the English Language Arts (ELA) assessment and Mathematics assessment for grades 4 and 8, combined.[24] Analysis for learner outcomes on statewide assessments reflect available data for 2017, 2018, and 2019.[25]

English Language Arts

Between 2016-17 and 2018-19, a larger percentage of HCSD students in grades 4 and 8 without disabilities scored proficient on the ELA assessment when compared to the state. However, a substantially smaller percentage of HCSD students with disabilities scored proficient. The gap between HCSD students with disabilities and students without disabilities averaged 44 percent over the three years analyzed. This gap was higher than the state achievement gap between students without disabilities and those with disabilities (29 percent) over the same period.

[24] Due to data suppression by NYSED, data for assessment outcomes in grades 4 and 8 independently are not publicly available, as a result, PCG conducted a combined grades 4 and 8 analysis for learner outcomes.
[25] Due to COVID-19, state assessments were not administered for all districts in 2020 and were not available on the NYSED website. Additionally, participation rates in New York for state assessments in 2021 were substantially below historical rates and were not included in the data analysis. The ability to analyze grades 4 and 8 combined learner outcome data was not available for 2022.

Exhibit 11. Percentage of Students Scoring Proficient on Grades 4 and 8 ELA, 2016-17 to 2018-19

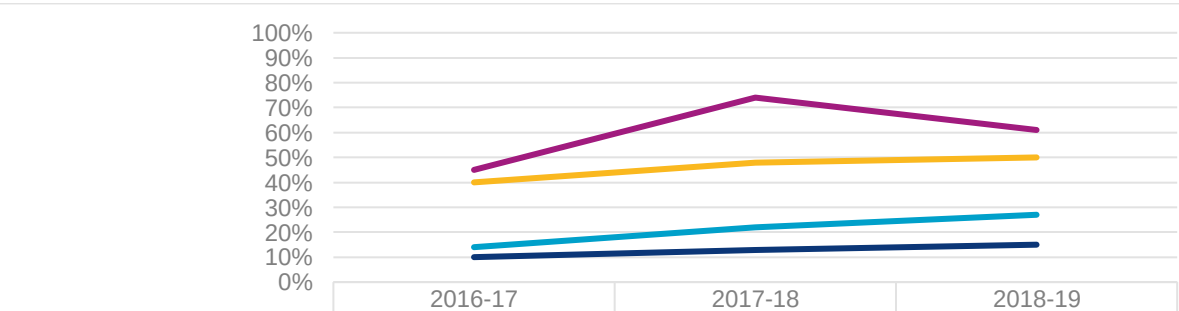


	2016-17	2017-18	2018-19
State Proficient - SwoD	46%	54%	55%
State Proficient - SwD	9%	15%	15%
HCSD Proficient - SwoD	68%	71%	72%
HCSD Proficient - SwD	0%	25%	10%

Mathematics

Similar to performance on the ELA assessments, between 2016 – 2019, the percentage of HCSD students without disabilities who scored proficient on the grades 4 and 8 math assessments was higher than the state average. The percentage of HCSD students with disabilities who scored proficient was also higher than the state average during the period analyzed. Additionally, HCSD students with disabilities who scored proficient increased 13 percentage points between 2016-2019. While there was improvement made during that time period, the achievement gap between HCSD students without disabilities and with disabilities was 29 percent, higher than the state achievement gap (25 percent).

Exhibit 12. Percentage of Students Scoring Proficient on Grades 4 and 8 Math, 2016-17 to 2018-19

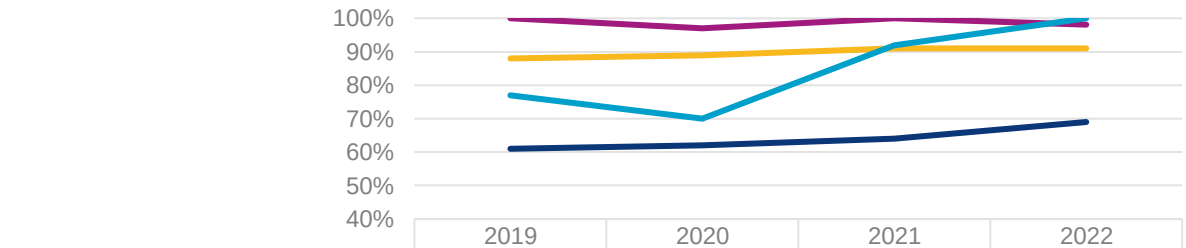


	2016-17	2017-18	2018-19
State Proficient - SwoD	40%	48%	50%
State Proficient - SwD	10%	13%	15%
HCSD Proficient - SwoD	45%	74%	61%
HCSD Proficient - SwD	14%	22%	27%

Graduation Rates

Between 2019 and 2022, a higher percentage of students with IEPs in HCSD graduated from high school compared to the state average for students with IEPs. Additionally, the all-student graduation rate for HCSD during the same period was also higher than the state average. Between 2019 and 2021, the percentage of HCSD students with IEPs who graduated increased 15 percentage points.

Exhibit 13. Percent of All HCSD Students and Students with IEPs Graduating from High School in 4 Years Compared with State Averages, 2019 to 2022

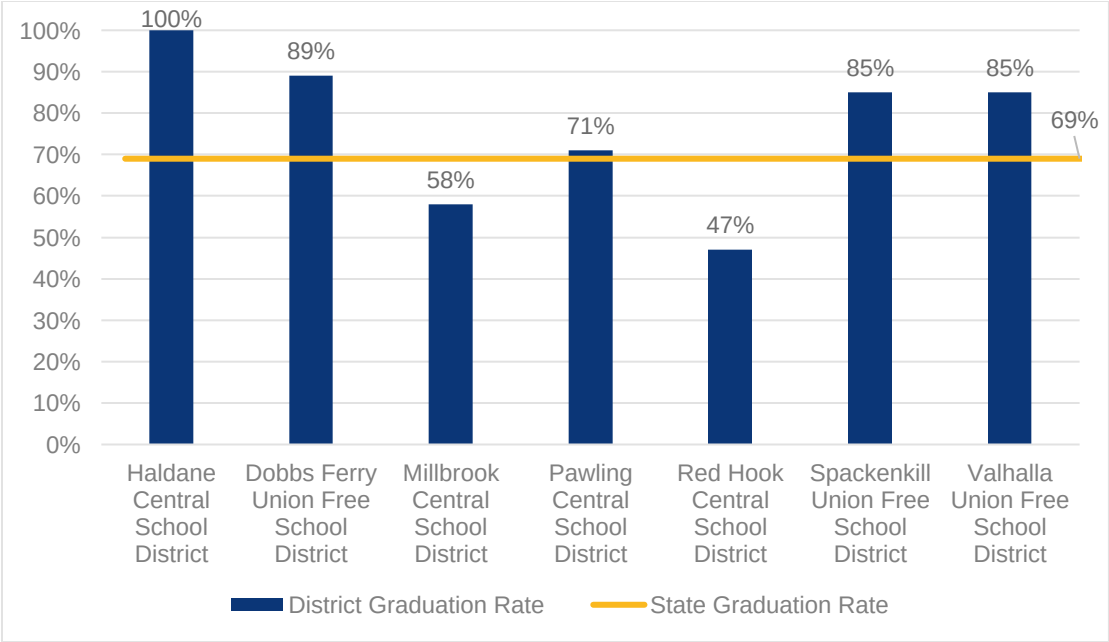


	2019	2020	2021	2022
State Graduation Rate - SwoD	88%	89%	91%	91%
State Graduation Rate - SwD	61%	62%	64%	69%
HCSD Graduation Rate - SwoD	100%	97%	100%	98%
HCSD Graduation Rate - SwD	77%	70%	92%	100%

District Comparison – Graduation Rates

Compared to the six New York districts provided by the District, HCSD had the highest graduation rate (100 percent). Three of the six comparable districts (Dobbs Ferry, Spackenkill, and Valhalla) had graduation rates ranging between 85 to 89 percent. Millbrook Central School District and Red Hook Central School District had graduation rates below the state. Red Hook had the lowest average graduation rate (47 percent).

Exhibit 14. Graduation Rate of Students with IEPs Compared to Other New York Districts and State, 2022

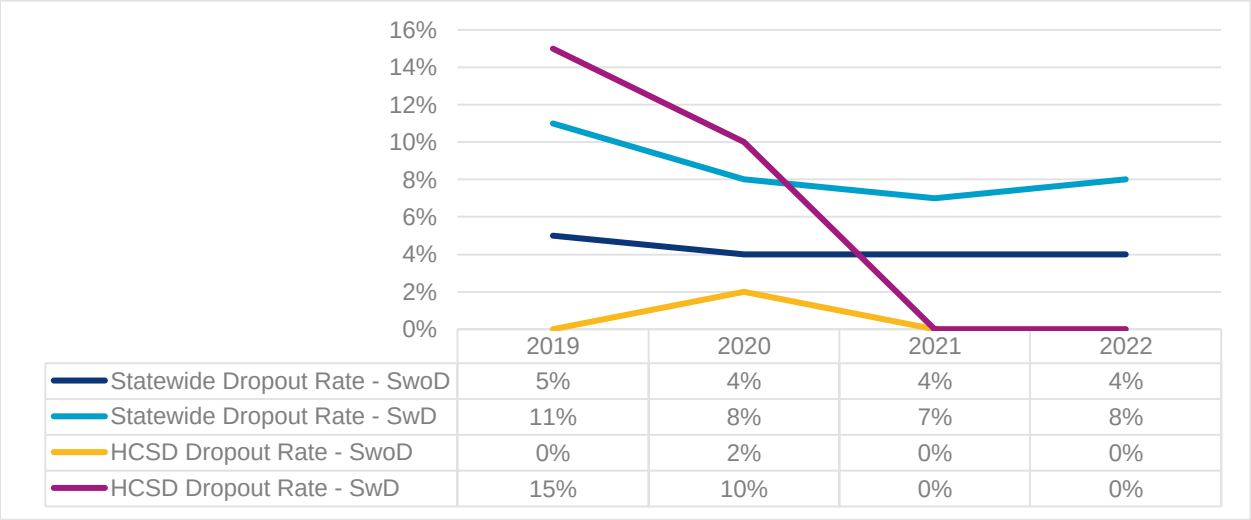


Dropout Rates

Between 2021-2022, HCSD students with IEPs had a dropout rate of zero percent. This was lower than the statewide dropout rate for students with IEPs and is down 15 percentage points from 2019. Between 2019-2020, the percentage of HCSD students with disabilities who dropped out was higher than the statewide dropout rate for students with disabilities and higher than the percentage of HCSD students without

disabilities who dropped out. It is important to note that due to the small sample size of students represented within the data, several students dropping out significantly impacted district performance on this metric.

Exhibit 15. Percent HCSD Students with and without Disabilities who Dropped Out Compared with State Averages, 2019 to 2022

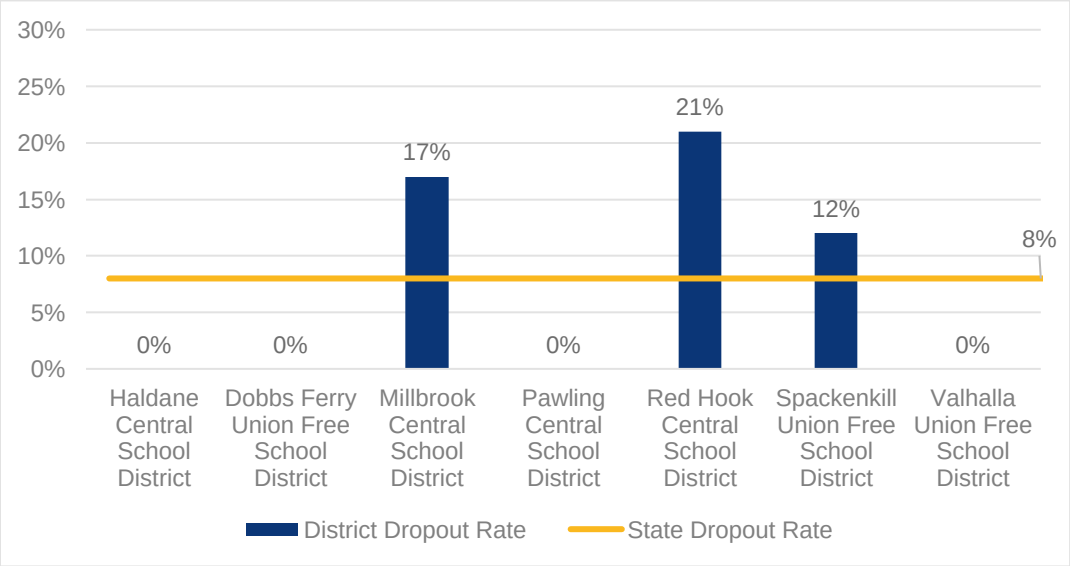


	2019	2020	2021	2022
Statewide Dropout Rate - SwoD	5%	4%	4%	4%
Statewide Dropout Rate - SwD	11%	8%	7%	8%
HCSD Dropout Rate - SwoD	0%	2%	0%	0%
HCSD Dropout Rate - SwD	15%	10%	0%	0%

District Comparison – Dropout Rates

When compared to the other New York districts, three of the six districts had a dropout rate of zero percent (Dobbs Ferry, Pawling, and Valahlla). The following comparable districts had dropout rates higher than HCSD and the state average (8 percent): Red Hook (21 percent), Millbrook Central (17 percent), and Spackenkill (12 percent).

Exhibit 16. Dropout Rate of Students with IEPs Compared to Other New York Districts and State, 2022



Educational Environment for Learning: School-Aged Students

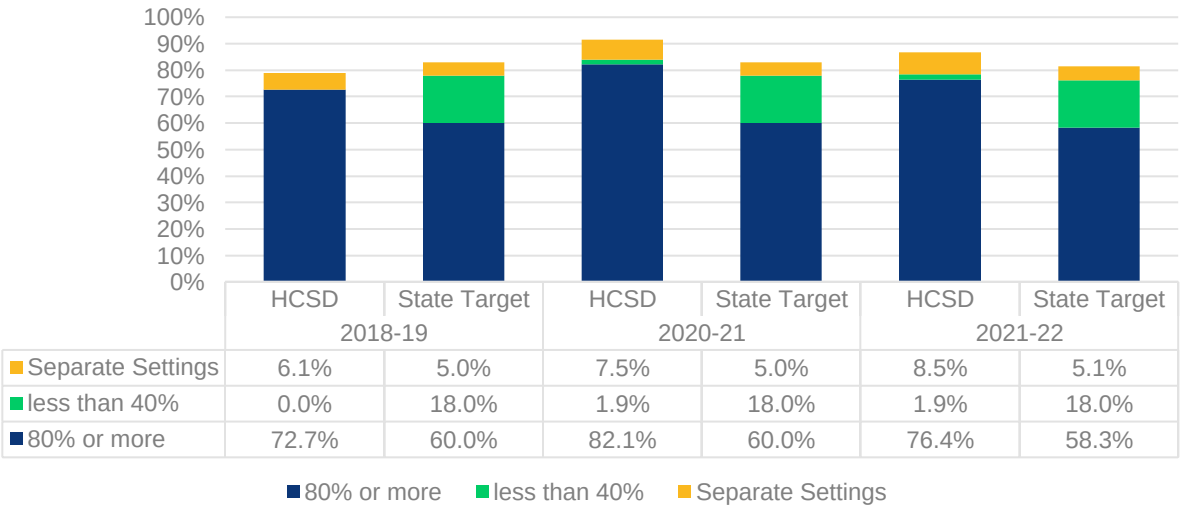
The data in this section reflect educational setting rates of all HCSD school-aged students identified for special education. Exhibits are also shown by disability areas and by race/ethnicity. In addition, HCSD data are compared to state and national data, and State Performance Plan (SPP) targets for the three

educational setting categories monitored by the federal Department of Education's Office of Special Education Programs (OSEP) and NYSED for students aged 6-21. OSEP requires each state to monitor and set targets in their SPP for educational settings in which identified students are educated.

Educational Settings for HCSD, New York, and SPP Targets

Longitudinal data from 2018-19 to 2020-21 indicate HCSD students with disabilities were more frequently in an inclusive general education setting than the target rates set forth by NYSED. Between 2018-19 and 2021-22, HCSD exceeded the state target for students spending 80 percent or more in general education as well as students spending less than 40 percent of their school day in general education. During the same time, HCSD did not meet the state target for students in a separate setting.

Exhibit 17. Percentage of Students (ages 6-21) by Educational Setting for HCSD & State SPP Targets, 2018-19 to 2020-21



	HCSD 2018-19	State Target 2018-19	HCSD 2020-21	State Target 2020-21	HCSD 2021-22	State Target 2021-22
Separate Settings	6.1%	5.0%	7.5%	5.0%	8.5%	5.1%
less than 40%	0.0%	18.0%	1.9%	18.0%	1.9%	18.0%
80% or more	72.7%	60.0%	82.1%	60.0%	76.4%	58.3%

District Comparisons

Compared to other New York districts, HCSD had the third highest rate of students who spent 80 percent or more of their day in general education, the lowest percentage of students spending less than 40 percent of their day in general education, and had the third highest percentage of students in a separate setting. Additional insights from the comparative analysis include:

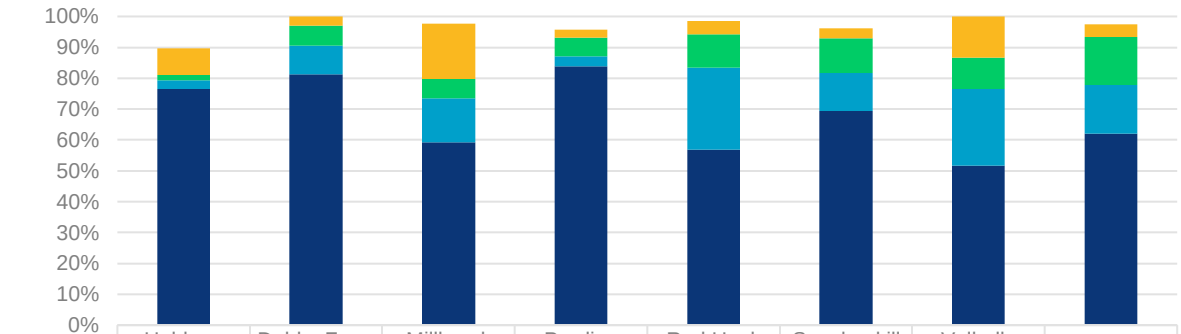
General education setting 80 percent or more of the time. Of the six comparable districts, the following exceeded the state rate for students spending 80 percent or more of their school day in general education: Pawling (84.0 percent), Dobbs Ferry (81.3 percent), and Spackenkill (69.4 percent).

General education setting between 40-79 percent of the time. HCSD had the second lowest percentage of students educated in this setting (2.8 percent). This was below the state average of 15.9 percent. Red Hook had the highest percentage of students in this setting (26.5 percent).

General education setting less than 40% of the time. All of the comparable districts had a smaller percentage of students in this setting compared to the state average of 15.6 percent.

Separate settings. The following districts had a higher percentage of students in this setting compared to HCSD (8.5 percent): Millbrook (18.1 percent) and Valhalla (13.4 percent). These percentages were higher than the state average of 4.1 percent.

Exhibit 18. Percent of Students by Education Setting for Comparable Districts, 2020-21



	Haldane Central School District	Dobbs Ferry Union Free School District	Millbrook Central School District	Pawling Central School District	Red Hook Central School District	Spackenkill Union Free School District	Valhalla Union Free School District	State
Separate	8.5%	3.0%	18.1%	2.5%	4.3%	3.2%	13.4%	4.1%
<40%	1.9%	6.4%	6.2%	6.2%	10.9%	11.3%	10.2%	15.6%
40-79%	2.8%	9.4%	14.1%	3.1%	26.5%	12.4%	24.8%	15.9%
≥80%	76.4%	81.3%	59.3%	84.0%	56.9%	69.4%	51.6%	61.9%

Educational Setting by Primary Disability Area

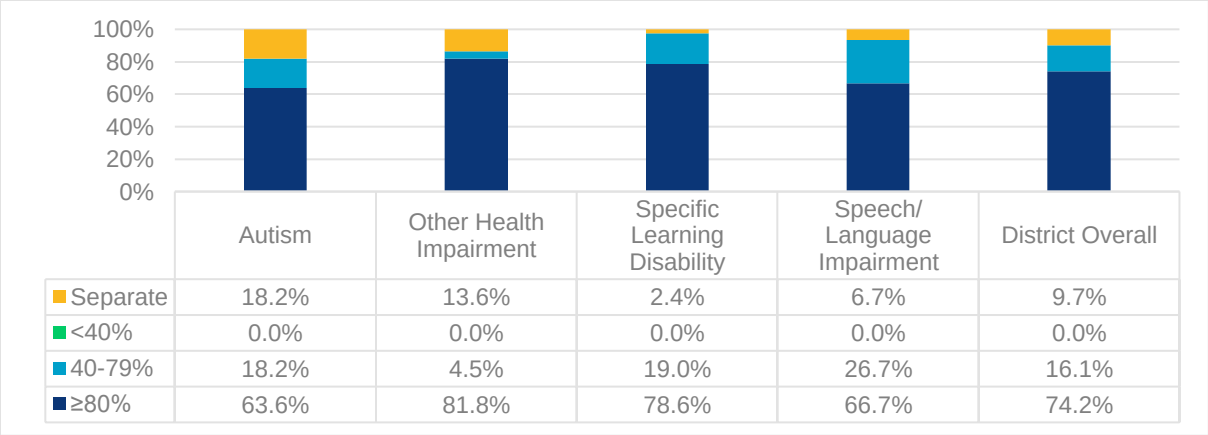
The chart below provides data on HCSD students by primary disability area and education setting. In 2022-23, 74.2 percent of students with IEPs spent 80 percent or more of their day in the general education setting, 16.1 percent of students spent between 40-79 percent of their day in general education, and 9.7 percent were educated in separate settings.

General education setting 80 percent or more of the time. Students identified in the following disability categories were included in the general education setting at a higher rate than the district average of 74.2 percent: other health impairment (81.8 percent) and specific learning disability (78.6 percent).

General education setting between 40-79 percent of the time. Students identified in the following disability categories were in this setting at higher rates than the district average of 16.1 percent: speech or language impairment (26.7 percent), specific learning disability (19 percent), and autism (18.2 percent).

Separate settings. Overall, 9.7 percent of students with an IEP were educated in a separate setting. Students with autism (18.2 percent) and a health impairment (13.6 percent) were educated in this setting at a higher rate than the district.

Exhibit 19. Educational Setting by Primary Disability, 2023



	Autism	Other Health Impairment	Specific Learning Disability	Speech/ Language Impairment	District Overall
Separate	18.2%	13.6%	2.4%	6.7%	9.7%
<40%	0.0%	0.0%	0.0%	0.0%	0.0%
40-79%	18.2%	4.5%	19.0%	26.7%	16.1%
≥80%	63.6%	81.8%	78.6%	66.7%	74.2%

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

The following comparative analysis was completed on the two most inclusive educational settings: 80 percent or more and 40-79 percent for HCSD, the state, and nation for students with autism, other health impairment, and specific learning disability.[26]

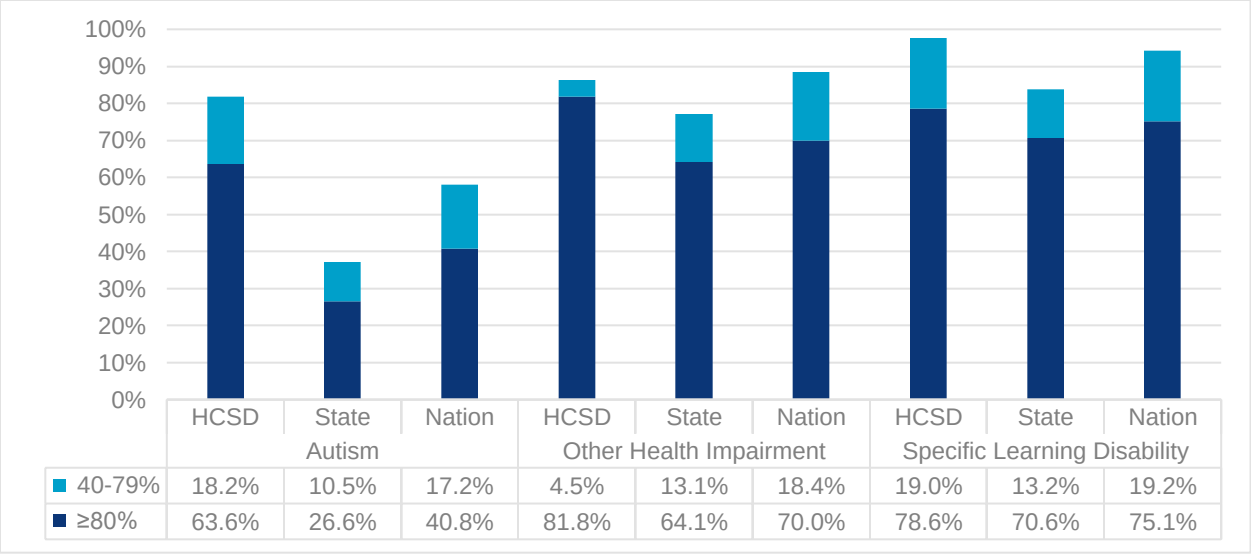
Autism. Compared to the state and national rates, HCSD educated a higher percentage of students with autism in the general education setting for more than 80 percent of the time. Of the students identified with autism, 63.6 percent spent 80 percent or more of their school day in general education, compared to 26.6 percent and 40.8 percent of students with autism in the state and nation, respectively.

Other Health Impairments. HCSD students with other health impairments were educated at a higher rate in general education for more than 80 percent of the time (81.8%), compared to the state and nation, 64.1 percent and 70 percent, respectively.

Specific Learning Disability. Of students with specific learning disabilities, 78.6 percent spent 80 percent or more of their day in the general education setting compared to 70.6 percent and 75.1 percent of students in the state and nation, respectively.

Exhibit 20. Percentage of HCSD Students (ages 6-21) with Autism, Other Health Impairment, and Specific Learning Disability Most Inclusive Educational Setting Compared to the State and Nation

[26] District data: Provided by HCSD representing 2022-23; State data (FFY 2017) obtained by Grads360:https://osep.communities.ed.gov/#p=19; National data obtained by the National Center for Education Statistics Digest of Education Statistics (2021) : https://nces.ed.gov/programs/digest/



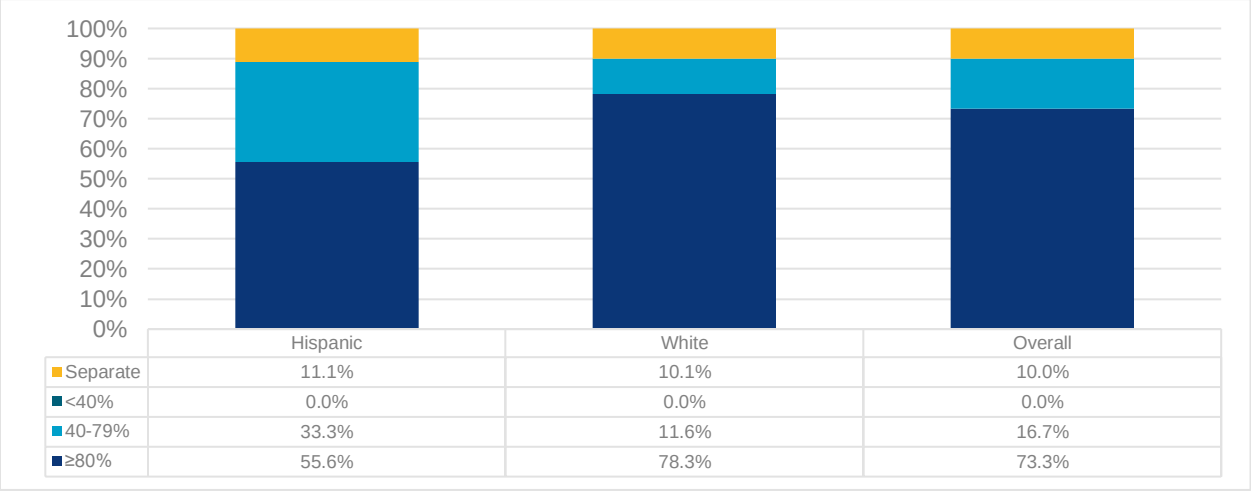
	HCSD	State	Nation	HCSD	State	Nation	HCSD	State	Nation
	Autism			Other Health Impairment			Specific Learning Disability		
40-79%	18.2%	10.5%	17.2%	4.5%	13.1%	18.4%	19.0%	13.2%	19.2%
≥80%	63.6%	26.6%	40.8%	81.8%	64.1%	70.0%	78.6%	70.6%	75.1%

Educational Setting by Race/Ethnicity

The exhibit below provides data on HCSD students by race/ethnicity and education setting.

A larger percentage of white students spent 80 percent or more of their school day in the general education setting (78,3 percent) compared to the district average (73.3 percent). A larger percentage of Hispanic students spent between 40-79 percent of their school day in the general education setting (33.3 percent), compared to the district average (16.7 percent).

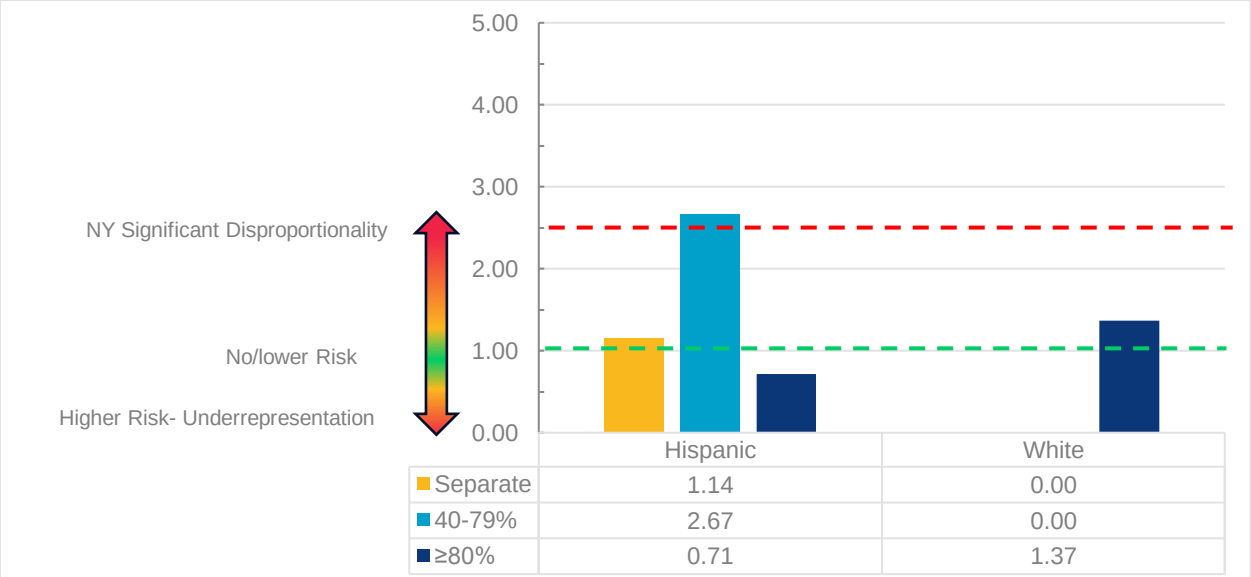
Exhibit 21. Percentage of HCSD Students with Disabilities (ages 6-21) by Race/Ethnicity and Educational Setting, 2023



	Hispanic	White	Overall
Separate	11.1%	10.1%	10.0%
<40%	0.0%	0.0%	0.0%
40-79%	33.3%	11.6%	16.7%
≥80%	55.6%	78.3%	73.3%

The NYSED monitors the extent to which students with disabilities of a particular race/ethnicity group are placed in more restrictive settings (separate settings and spending less than 40 percent of the day in general education) at a disproportionately higher rate. The threshold for significant disproportionality is 2.5. No student race/ethnicity group met or exceeded 2.5 for the most restrictive settings. However, the below risk ratio analysis does indicate Hispanic students spent less time in the general education setting compared to white students.

Exhibit 22. Risk Ratios by Race/Ethnicity and Disability, 2022-23



	Hispanic	White
Separate	1.14	0.00
40-79%	2.67	0.00
≥80%	0.71	1.37

Summary and Implications

The data in this chapter showcase both positive trends in HCSD as well as areas that require further analysis. HCSD received a Results Driven Accountability (RDA) determination of "Meets Requirements" and met or exceeded the state target across most indicators for the 2020-21 school year. It is notable HCSD has a 100% four-year graduation rate for students with disabilities which is higher than the state average (69%). Additionally, HCSD educates students with disabilities 80 percent or more of the day in the general education setting (76.4% in the 20-21SY) when compared to the state average (58.3%).

There are some concerning trends, however, related to the achievement gap in reading and math for students with IEPs. Between 2016-17 and 2018-19, a larger percentage of HCSD students in grades 4 and 8 without disabilities scored proficient on the ELA assessment when compared to the state. However, a substantially smaller percentage of HCSD students with disabilities scored proficient. The gap between HCSD students with disabilities and students without disabilities averaged 44 percent over the three years analyzed. This gap was higher than the state achievement gap between students without disabilities and those with disabilities (29 percent) over the same period.

Similar to performance on the ELA assessments, between 2016 – 2019, the percentage of HCSD students without disabilities who scored proficient on the grades 4 and 8 math assessments was higher than the state average. The percentage of HCSD students with disabilities who scored proficient was also higher than the state average during the period analyzed. Additionally, HCSD students with disabilities who scored proficient increased 13 percentage points between 2016-2019. While there was improvement made during that time period, the achievement gap between HCSD students without disabilities and with disabilities was 29 percent, higher than the state achievement gap (25 percent). This is an area HCSD should further investigate to determine why students with IEPs are experiencing an achievement gap in math and reading assessment performance.

IV. INTERVENTION SUPPORT AND REFERRAL PROCESS

Strengths

- **Multi-Tiered System of Student Supports (MTSS).** The district has a well-established framework for MTSS procedures, including guidance, entry criteria, intervention resources, and progress monitoring strategies.
- **Confidence in Special Education Processes.** HCSD staff consistently report feeling fluent in special education processes from referral through IEP development.

Opportunities for Improvement

- **Transitioning from MTSS to a Special Education Referral.** District staff have an orientation to provide support for students; however, this may result in students spending a considerable amount of time receiving informal supports before a formal referral process begins.
- **Educational Evaluations.** Educational evaluations are not consistently regarded as high quality or timely. Parents are often seeking private evaluations in lieu of district initiated evaluations.

Referral Process

In September 2021, HCSD adopted a Multi-Tiered System of Student Support guidance framework. The district created this framework to provide "a differentiated level of support for struggling students…and to enable professional staff to assess a student's response to instruction and intervention (RtI) and make decisions on how to adjust academic intervention services and/or social emotional supports (SEL) provided

within their school day."[27] The NYS Commissioner's regulation, 100.2.ee, is in alignment with this approach.[28]

MTSS Framework

The provision of instruction/interventions and support to students within a framework of Multi-Tiered System of Supports (MTSS) improves educational outcomes for all students, including those with Section 504 and IEP plans.[29] It is designed to be a general education initiative. The framework focuses on prevention and the early identification of students who may benefit from instructional and behavioral interventions, as well as acceleration that remove barriers to learning.[30] When implemented as intended, MTSS leads to increased academic achievement by supporting rigorous core instruction and strategic/targeted interventions, and improved student behavior. Furthermore, the framework has been successfully used to support a reduction in disproportionate special education referrals of students based on race, gender, or EL subgroups.

Reflecting on the growing recognition of MTSS as a system wide framework for supporting student achievement and positive behavior, Every Student Succeeds Act (ESSA) includes MTSS as a permissible usage of Title I funds. The Act defines MTSS as "a comprehensive continuum of evidence- based, systemic practices to support a rapid response to students' needs, with regular observation to facilitate data-based instructional decision-making."[31] MTSS provides an overall framework for structuring and coordinating the provision of core instruction along with the additional behavioral supports, such as behavior modifications or mental health supports, some students require so that all are successful. MTSS is centered on a tiered system of support, where every student receives high quality core instruction, known as Tier 1. Some students need supplemental instruction, which is referred to as Tier 2, and a small cohort of students receive the most intensive intervention and supports, known as Tier 3. Movement among these tiers should be fluid. A student with acute needs does not need to progress through the tiers to get individualized support, and a student who needs extra support should not miss general instruction that is provided in Tier 1.

District Practices

In HCSD, the MTSS model includes several strands of support integrated to form a comprehensive approach targeting support for all students. This school-based student support model utilizes various screening tools to determine student needs and multiple measures to monitor student progress and to adjust support. As published within the "Multi-Tiered System of Student Support" guidance document, the district's approach implements both academic support and social emotional support:

The left side of the MTSS framework defines the academic supports available through the district Response to Intervention (RtI) model and Academic Intervention Services (AIS). The right side of the MTSS framework defines the supports available through the district's Social and Emotional (SEL) options.

Exhibit 23. District MTSS Guidance Document, 2021

[27] Multi-Tiered System of Student Support, Haldane Central School District, September 2021
[28] id.
[29] See the Council of the Great City School's document, Common Core State Standards and Diverse Students: Using Multi- Tiered Systems of Support that outlines the key components of an integrated, multi-tiered system of instruction, interventions, and academic and behavioral supports needed by school districts in the implementation of the Common Core State Standards. The document is applicable also to school districts in states that have not adopted these standards.
[30] MTSS reflects the merger of response to instruction/intervention (RTI2), which typically focuses on academic achievement, and a system used to focus on improving positive behavior support.
[31] Elementary and Secondary Education Act, as reauthorized in 2015.

Academics (RtI/AIS)	*Multi-Tiered System of Supports (MTSS)*	*Social and Emotional (SEL)*
Differentiated large and small group instruction and universal interventions for all students.	Tier 1 Typically effective for 80-85% of students	Explicitly taught social and emotional behaviors within all settings of the school environment.
Targeted academic interventions for students who are not making adequate progress with Tier 1 instruction and universal interventions.	Tier 2 Typically needed for 10-15% of students	Targeted social and emotional interventions for students who are not making adequate progress with Tier 1 instruction and universal interventions.
Intensive interventions for students who are not responding to Tier 2 targeted interventions	Tier 3 Typically needed for 1-5% of students	Intensive interventions for students who are not responding to Tier 2 targeted interventions

HCSD has established well-defined referral processes for MTSS. Parents/guardians, as well as staff, may submit a referral packet to the Student Support Team (SST). School level teams conduct a review process of Tier 1 interventions, and samples of classroom work, then issue recommendations. The comprehensive SST will recommend exit from support contingent upon a demonstration of adequate progress. The district has created universal referral forms, parent communication templates, and interventions, and screeners. Entry and exit criteria for MTSS are representative of sound, best practices. A sample of K-5 entry criteria outlined in district guidance is included below.

Exhibit 24. MTSS Guidance Document, Entrance and Exit Criteria, 2021

	NWEA Reading Fall [1]	NWEA Reading Winter [1]	NWEA Reading Spring [1]	NYS ELA Test [2]	Reading Level Dec	Reading Level March	Reading Level June	Course GPA	NWEA Math Fall [1]	NWEA Math Winter [1]	NWEA Math Spring [1]	NYS Math Test [2]	Required Fluency [3]
K	124.43	134.50	141.03	NA	<2	<3	<4		127.06	138.19	145.08	NA	Add/subtract within 5
1	143.27	152.64	157.21	NA	<6	<10	<16		147.62	157.59	163.22	NA	Add/subtract within 10
2	157.16	166.15	170.08	NA	<20	<24	<28		162.06	171.06	175.98	NA	Add/subtract within 20 Add/subtract within 100 (pencil and paper)
3	169.97	177.76	180.85	NA	<30	<34	<38		175/03	182.59	186.97	NA	Multiply/ divide within 1002 Add/subtract within 1000
4	179.89	186.25	188.52	592	<40	<40	<50		185.15	191.15	194.95	593	Add/subtract within 1,000,000
5	188.10	193.24	195.01	593	<50	<50	<60		193.94	198.82	202.05	595	Multi-digit multiplication

The district has created internal professional learning and a flow chart to support educators in determining the appropriate intervention tiers for students. Additionally, select HCSD staff are serving as an ad-hoc MTSS committee revising guidance, such as High-Leverage Practices, and developing more comprehensive scopes and sequences for Phonics instruction. Focus group participants acknowledged the district's adoption of a new comprehensive structured language program, Preventing Academic Failure (PAF), as a welcomed opportunity to support students in Tier III intervention status. The district also deploys a variety of social emotional intervention supports such as Putnam County CoveCare, Mental Health First Aide, and Dialectical Behavior Therapy (DBT).

Two unique perspectives emerged as themes when analyzing qualitative data gathered on RTI or MTSS procedures in HCSD:

- There is a considerable amount of intervention occurring for students both formally and informally through RtI and/or MTSS.
- HCSD staff collectively have an orientation towards providing support for struggling students.

Ongoing collaboration between district staff, special and general educators as well as district leaders, has created a culture centered on student support. This cultural orientation coupled with well-established practices supports a defined approach to MTSS within HCSD. While the orientation of support is student focused, focus group and interview participants questioned how long a student may be in "limbo" for AIS.

Building level leaders are responsible for the implementation of MTSS procedures within their respective buildings. During focus groups, it was reported that the district could benefit from a more cohesive oversight of and systematic approach to MTSS procedures.

- 91% of elementary school staff
- 80% of middle school staff
- 68% of high school staff
- 77% of all staff

Agree that before a student is referred for special education, every attempt is made to meet the student's needs through general education interventions.

Staff Survey

HCSD staff participated in a survey targeting different instructional and behavioral approaches, such as MTSS and PBIS. HCSD staff's interest in attending professional learning opportunities targeting general education initiatives, such as positive behavior intervention and supports, is consistent with other findings. Specifically, 95% of elementary survey respondents would prioritize attending training on positive behavior intervention and supports. Comparatively, only 56% and 54% of middle school and high school respondents expressed an interest in this training opportunity.

Referral

The special education process can be initiated by a parent referral or by authorized individuals within HCSD, including the student support team (SST), student's teacher, or the chairperson of the District's Committee on Special Education (CSE).[32] Other professional members of the District are authorized to make a "request for a referral" for an initial evaluation according to the New York Department of Education Special Education Standard Operating Procedures Manual.[33] Designated staff must send the parent the Prior Written Notice of Referral (PWN) for initial evaluation and a copy of the Procedural Safeguards Notice within five school days of the date of the referral.[34]

- 81% of elementary school staff
- 70% of middle school staff
- 62% of high school staff
- 70% of all staff

Agree that they fully understand the steps and timelines associated with the referral process.

Staff Survey

HCSD has outlined intervention processes staff should engage in prior to a referral to determine eligibility for special education and/or related services in the event a disability is not suspected. Specific Child Find procedures were not described in detail for documents reviewed as part of this comprehensive evaluation. The draft Special Education Plan 2022-2024 does not explicitly state Child Find referral processes; however, the district should consider outlining these processes similar to MTSS procedures.

- 76% of elementary school staff
- 70% of middle school staff
- 90% of high school staff
- 78% of all staff

Agree that they are comfortable recommending a student be referred for a special education evaluation with the support of the Student Support Team.

Staff Survey

Narrative data was analyzed related to district special education referral processes. The perception existed among some parents that the process for gathering referral data was arduous and required a considerable amount of effort on behalf of parents. Alternatively, it was shared that the provision of a doctor's note with a diagnosis (not a formal evaluation report) provided by parents to request 504 accommodations has been established. Focus group and interview participants reported that more referrals are being generated for the students in the preschool age range and those attending private schools in the area. In June of 2021, there were nine CPSE eligible students compared to 11 in June 2022.[35] As of February 2023, there were 16 eligible CPSE students with five eligibilities pending.[36] This increase has resulted in CPSE programs being "full",

[32] https://infohub.nyced.org/docs/default-source/default-document-library/specialeducationstandardoperatingproceduresmanualmarch.pdf?sfvrsn=4cdb05a0_2
[33] id.
[34] id.
[35] Haldane PPS Department Update PPT to the Board, March 2023
[36] id.

a shortage of related service providers to provide services, and subsequent busing struggles.[37]Compliance monitoring and referral tracking occurs manually by district staff and is cross-referenced with IEP database tracking information according to focus group and interview participants. District staff gather required referral data through more organic processes. As such, no formal data points necessary when determining if evaluations are warranted were reviewed as part of this evaluation. Comparable data points and procedures exist for MTSS. It is recommended that district staff develop additional guidance for CSE (school-age students) to streamline processes and ensure consistency in information reviewed.

According to parents who responded to the survey question: "Did HCSD staff clearly explain to you why your child needed special education services?": over 76% reported "yes" in comparison to 5.9% of respondents reporting "no." 17.6% of parent survey respondents indicated their child had an IEP at a prior district.

Evaluation and Determination of Eligibility

After the Prior Written Notice (PWN): Notice of Referral: Initial and a copy of the Procedural Safeguards Notice have been sent to the parent, the Notice of Social History Meeting is sent.[38] According to state regulations, "the Notice of Social History Meeting establishes an appointment data for the meeting that must be held:

- As soon as possible;
- No later than 15 business days from the date of initial referral;[39] and
- No earlier than seven business days from the date the Notice of Social History Meeting is mailed (unless the parent has agreed to an earlier date."[40]

Initial evaluations in New York state require a social history, physical examination, an individual psychoeducational assessment, and at least one observation of the student in the current educational setting.[41] For students age 12 or older, an assessment that includes a review of school records, teacher assessments, and parent/student interviews to determine vocational skills, aptitudes, and interest is required.[42] All areas of suspected disability must be appropriately explored, and behaviors impeding learning to be appropriately assessed as part of the initial evaluation process.[43]

Within HCSD, educational evaluations are conducted by district special educators receiving an additional stipend. Educational evaluations are administered in addition to their existing scope of work. The budget for paying additional stipends is limited to partnering with five educational evaluators. It was reported that educational evaluations are often "late" with subsequent impacts on timelines and providing parents information in a timely manner. Psychologists employed by the district conduct assessments as part of their role and do not receive an additional stipend.

In 2022, HCSD had a total of 23 initial evaluations for special education. Of the 23 evaluations, seven students were found eligible, 11 were found ineligible, one student was exited from special education.

Parents provided feedback that district evaluations, particularly educational assessments, can be inaccurate and/or not aligned with state standards. Diagnostic validity of educational assessments and the district staff's ability to comprehensively conduct assessments related to dyslexia/dysgraphia was raised

[37] id.
[38] https://infohub.nyced.org/docs/default-source/default-document-library/specialeducationstandardoperatingproceduresmanualmarch.pdf?sfvrsn=4cdb05a0_2
[39] For parent referrals (or initials referrals from other authorized non-DOE sources), the date of the initial referral is the date the initial referral document was received by the school/CSE. For DOE referrals, the date of the initial referral is the date the PWN: Notice of Referral: Initial and a copy of the Procedural Safeguards Notice were sent to the parent.
[40] https://infohub.nyced.org/docs/default-source/default-document-library/specialeducationstandardoperatingproceduresmanualmarch.pdf?sfvrsn=4cdb05a0_2
[41] id.
[42] https://infohub.nyced.org/docs/default-source/default-document-library/specialeducationstandardoperatingproceduresmanualmarch.pdf?sfvrsn=4cdb05a0_2
[43] id.

as a concern. It is important to note that parents in HCSD often referred to receiving outside diagnoses to bolster district-led evaluation processes or discussed paying for independent educational and/or psychoeducational assessments as a typical practice (specifically, that outside assessments are expensive with no cost-sharing measures on behalf of the district). The district's draft special education plan does reference selected agencies which provide psychological/education services. The document states, "to our knowledge there are no agencies available to Westchester/Putnam residents which provide free evaluations, but some of these may function on a 'sliding scale' based on income or ability to pay. This list is not an intended endorsement of these agencies, but is provided for your (parents) information as required by the Regulation of the Commissioner of Education."[44]

It is the impression of the PCG evaluators that parents should not believe they must rely on privately funded educational assessments to supplement district assessments. Moving forward, HCSD can partner with the Learning Differences Committee to clarify expectations for district-conducted educational and/or psychoeducational assessments utilized in eligibility determination. There is an opportunity for clarifying the functional differences between diagnostic assessments conducted that do not determine educational impact by outside agencies, rather than assessments conducted by the district to determine eligibility for special education and/or related services. Lastly, the district must establish evaluation and assessment-guidance for HCSD students when determining initial and ongoing eligibility. The district also must conduct internal audits of staff conducted educational and psychoeducational assessments to determine if meet district-established thresholds.

According to HCSD staff who participated in the survey:

1. Approximately 69 percent of all respondents believe there is no intentional delay in the process when a student is referred for special education services.
2. Approximately 69 percent of all staff agree that special education evaluations are sufficiently comprehensive to identify students' specific strengths and needs.
3. Seventy percent of respondents agree the results of special education evaluations are shared in ways that provide meaningful insights into students' educational needs.

Summary and Implications

Although district leadership has made strides in building out intervention guidance and resources, the perception continues to exist that students get "stuck" between MTSS and special education. Inconsistencies in special education processes and procedures have resulted in students with disabilities having highly variable experiences. For example, the practice of parents believing access to special education services is contingent upon independent educational evaluations, coupled with educational evaluators completing evaluations secondarily to their current roles. Limitations in special education guidance related to referral, assessment, and evaluation practices should remain an area of focus for HCSD.

[44] Draft Haldane Special Education Plan, 2022-2024

V. SPECIALIZED SERVICES AND SUPPORTS

Strengths

- **Prioritizing Inclusion**. District leadership has prioritized being inclusive and promoting a growth mindset for students with disabilities in HCSD.
- **Least Restrictive Environment (LRE) Expansion.** HCSD staff have demonstrated a commitment to expansion of placements and continuum of services.

Opportunities for Improvement

- **Limited LRE**. Limited continuum of services resulting in restrictive specially designed instruction service provision and need to use out of district placements at a higher rate.
- **Integrated Co-Teaching (ICT) Instructional Model.** Overreliance on ICT as a primary instructional model and limiting beliefs that this is the most effective model to support specially designed instruction for students with disabilities.
- **IEP Development Guidance**. No formal guidance exists for HCSD to utilize when drafting, updating, and modifying IEPs.

Placement and Continuum of Services

The Individuals with Disabilities Education Act (IDEA) requires students with Individualized Education Programs (IEPs) to receive a Free and Appropriate Public Education (FAPE) in the most appropriate setting for their individual needs, also referred to as the Least Restrictive Environment (LRE). To the extent possible, students with disabilities must be included in the core curriculum and receive targeted, evidence-based interventions that are implemented with fidelity to meet their needs as outlined in their IEPs.

Each district must offer a continuum of special education services and supports, ranging from those occurring in the general education classroom to arrangements for services to occur in an alternative educational setting. Where a student with a disability receives specialized instruction and/or related services is described in the field as "placement." IEP placement decisions are to be based on each student's individualized needs rather than service availability or preset arrangements with no flexibility.

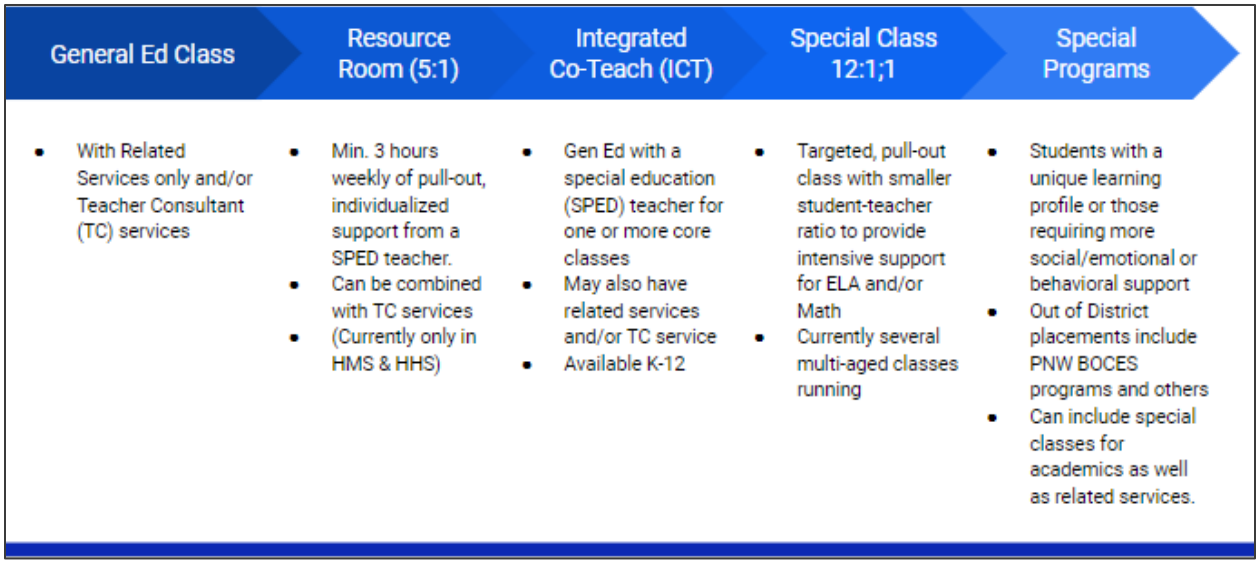
According to a recent paper by the IRIS Center at Vanderbilt University:[45]

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

HCSD offers the continuum of services and programs representative of New York state.[46] The continuum of special education services for school-age students in HCSD ranges from service provision in general education classes through special programs. The graphic below highlights the continuum:[47]

Exhibit 25. Continuum of Services

[45] https://iris.peabody.vanderbilt.edu/wp-content/uploads/pdf_info_briefs/IRIS_Least_Restrictive_Environment_InfoBrief_092519.pdf
[46] https://www.nysed.gov/special-education/continuum-special-education-services-school-age-students-disabilities
[47] Haldane PPS Department Update & Budget Presentation, March 2023



Of the staff who responded to the survey, 46% agreed that HCSD offers a continuum of services to meet the needs of all students with IEPs. While 40% of respondents do not believe that HCSD offers the necessary continuum to meet students with IEPs needs, 14% reported "I don't know" or "not applicable."

Focus group and interview participants noted the following about the district's continuum of services:

- 40% of elementary school staff
- 57% of middle school staff
- 61% of high school staff
- 46% of all staff

Agree that HCSD offers a continuum of services to meet the needs of all students with IEPs.

Staff Survey

Strengths

- Inclusive opportunities for students with disabilities and their non-disabled peers are an inherent practice due to the limited least restrictive environment continuum.
- There is a commitment to ensuring that student needs are met through out of district placements if the district cannot provide the necessary programming.
- The district is making strides to create more specialized, in-house programming to serve students with disabilities through partnerships with a neighboring district.
- The strong teaching staff and surrounding tight knit community make concerted efforts to retain students with disabilities within the district, if possible. Parents have advocated for their students to remain in the district with peers, siblings, etc., and the district teams work diligently to provide the appropriate services within the existing continuum of placements.
- The district has an intentional focus on students being involved in the school community and being members of the larger community.
- District and building leaders are thoughtfully weighing the benefits of expanding the continuum, meeting student needs, scheduling teaching teams, and being good stewards of public dollars simultaneously. A participant acknowledged offering special classes of five or fewer students is not necessarily efficient, but it is important to provide the support needed through a more intensive model. This potentially allows for fewer out of district placements when providing this support.

Concerns

- Students with more significant manifestations of their disability often are not served within the district.
- Most students with IEPs are served through three instructional models: Integrated Co-Teaching (ICT), Resource Room (pull-out), and/or special class ELA and Math. The district does not offer

any in district, full day self-contained programming. Students requiring more intensive, full day self-contained programming often attend out of district placements.

- District size inhibits large scale growth of an expansive least restrictive environment continuum. Participants recognized that it is not a sustainable model or beneficial for students to support self-contained programming for a "cohort of 1"; however, attending an out of district placement comes at another cost for students.
- The ICT instructional model is limited, primarily, to core courses. Overreliance on ICT as a primary model within a small district with limited staffing has led to staff spending part of their time across several classrooms.

Program Offerings

As of the 2022-2023 school year, the district provides the following special education programs.

Exhibit 26. HCSD Continuum of Services, 2022-23

CONTINUUM OF SERVICES 2022-2023

LRE

Haldane Elementary School	Haldane Middle School	Haldane High School
K-3 • ICT ELA 1.5 hrs/day • ICT Math 1 hr/day • (Tier III PAF reading) • Special Class ELA (grades 3-4)	**Grade 6** • Resource Room • Program Aide SS • Program Aide Science • ICT ELA • ICT Math	**Grade 9** • Resource Room • ICT ELA • ICT Global 9 • ICT Earth Science • ICT Algebra
Grade 4 • Consultant Teacher Direct/Indirect • ICT ELA 1.5 hrs/day • ICT Math 1 hr/day • Special Class ELA (grades 3-4) • Special Class Math • (Tier III PAF reading)	**Grade 7** • Resource Room • Consultant Teacher direct/indirect • Program Aide SS • Program Aide Science • ICT ELA ICT Math • Special Class Reading	**Grade 10** • Resource Room • ICT ELA • ICT Global 10 • ICT Geometry • ICT Biology • Special Class ELA
Grade 5 • ICT ELA 1hr/day • ICT Math 1 hr/day • (Tier III PAF reading)	**Grade 8** • Resource Room • Program Aide SS • Program Aide Science • ICT ELA ICT Math • Special Class Reading	**Grade 11** • Resource Room • ICT ELA • ICT US History • ICT Algebra 2/Trig • Special Class Math (PNW BOCES Tech Center)
		Grade 12 • Resource Room (PNW BOCES Tech Center)

According to parents who participated in the survey, many responded favorably toward the delivery of special education services their child receives. Approximately, 79% of parents indicated they agreed or strongly agreed they are satisfied with their child's overall special education services.

Parents have provided resoundingly positive feedback on HCSD's strong teaching staff, particularly special educators, and leadership. Staff are regarded as warm, supportive, engaging, accommodating, thoughtful, and hardworking. Focus group participants and parent survey respondents also highlighted the importance of their students having an opportunity to remain in district with a more expansive least restrictive environment continuum being made available. The district has begun adopting creative solutions to address

the limited least restrictive environment continuum challenges, such as partnering with a neighboring district to cost-share and house new specialized classrooms. As this evolves, it will be critical that students are offered an opportunity to remain connected to the district and peers through adaptive sports, clubs, etc.

Specially Designed Instruction

In order for all students, including those with IEPs, to meet high academic standards and fully demonstrate their knowledge and skills in reading, writing, speaking, listening, and mathematics, their instruction must be flexible yet challenging and incorporate scaffolds and accommodations to overcome potential learning barriers. It is essential that the curriculum be designed to enable all students to successfully access and engage in learning without changing or reducing instructional targets. In order to meet the diverse needs of all learners in the classroom, educators must prioritize Universal Design for Learning (UDL) strategies as part of core instruction in the general education classroom, as well as Differentiated Instruction, Accommodations and Modifications, and Specially Designed Instruction (SDI) to support access and success of learners.[48] Implementing such a varied mix of appropriate supports while maintaining the integrity of the curriculum can be challenging but is necessary to support diverse learners.

Students with IEPs often need more time to master concepts through specialized, research-based approaches according to instructional need, measured performance, and recognized disability. SDI, by definition, meets this need by adapting, as appropriate to the needs of an eligible child, the content, methodology, or delivery of instruction:

> i. To address the unique needs of the child that result from the child's disability; and
>
> ii. To ensure access of the child to the general curriculum, so that the child can meet the educational standards that apply to all children within the jurisdiction of the local education agency. [49]

Specially designed instruction occurs in several different placements within HCSD: ICT, consultant teacher services, related services, and special classes. Focus group and interview participants consistently expressed a need for specially designed instruction to be provided across all ICT core courses. ICT is provided for Math and ELA at the elementary, middle, and high school and some additional classes. The provision of specially designed instruction in ICT, as a primary instructional model, has resulted in ICT classes becoming “catch all” according to study participants. Reportedly, there is a wide continuum of student needs being served in ICT, which may not be ideal for meeting the individual student needs. Stakeholders reported that the lack of ICT all day and across all courses could result in students with more significant manifestations of their disabilities requiring an out of district placement eventually. No data provided supports that perspective.

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

- Explicit Direct Instruction
- Individualized Support
- Elements of ICT
- Accommodations and modifications

Focus group and interview participants shared a wide range of feedback regarding the instructional models deployed in HCSD. A consistent theme expressed was the district has strong co-teaching teams and working relationships are well established. This has led to “good, productive outcomes” for students with disabilities. Many participants expressed how talented their colleagues are and how much individuals truly

[48] Universal Design for Learning (UDL) is an educational framework that aims to create inclusive and accessible learning environments for all students. UDL provides a blueprint for designing instructional materials, methods, and assessments that accommodate the diverse learning needs of students through Multiple Means of Representation, Actions and Expressions, and Engagement.
[49] 34 CFR 300.39(b)(3)

enjoy their work. That was affirmed by PCG staff who had the opportunity to visit onsite. The collegiality amongst the teams and their warm interactions with one another was palpable.

The co-teaching structure within HCSD was described in a variety of ways. It is important to note that both terms, ICT and co-teaching, were used interchangeably by HCSD staff across focus groups, interviews, open-ended survey data, and file reviews. The inconsistency of structures and understanding of expectations for an in-class resource or co-teaching model throughout the district is a challenge and leads to confusion, as noted by survey and focus group participants. The following preliminary themes were identified as part of this analysis:

- There is a lack of shared vision for co-teaching.
- Co-teaching expectations are highly variable by building and teaching teams.
- A lack of consistent and cohesive practices leads to confusion on how best to implement co-teaching models.
- Scheduling has a significant impact on co-teaching team's ability to collaborate and plan.

In HCSD, staff shared the following through the survey:

- Forty-eight percent of respondents agreed that HCSD has established standards for delivering co-teaching or collaborative instruction. There was incredible variability, by role, in response to this survey question. Sixty percent of special educators believe there are established standards for delivering co-teaching/collaborative instruction compared to 33.4% of general educators. One hundred percent of specials/electives teachers and student support service providers believe there are standards compared to 50% of Related Service Providers. Fifty percent of Related Services Providers indicated "I don't know" in response to this survey question.
- Sixty-five percent of respondents agreed that students with IEPs in their school are receiving instruction and services in general education class to the maximum extent possible. There was variability, by role, in response to this survey question, too. Ninety percent of special educators believe students with IEPs in their school are receiving instruction and services in general education class to the maximum extent possible compared to 62% of general educators. Almost 30% of general educators believe that students with IEPs can be served more in the general education class.

It is critical that the district begins uncovering the fundamental differences in perspectives influencing HCSD staff and how those impact instructional and inclusive opportunities for students with disabilities.

The overreliance of ICT as a primary instructional model with limited special education staff to support specially designed instruction for core courses has resulted in scheduling challenges. According to focus group and interview participants, special educators are teaching additional courses beyond their current contractual scope and "hopping" across classrooms during core instructional blocks. For example, special educators in the elementary setting are not always there for the entire literacy instructional period if it runs beyond the 90 minutes allotted resulting in students reliant upon that level of support "struggling." Special and general educators' pairs have limited co-planning time as a result of the scheduling challenges across all HCSD schools. Teaching staff have "gone above and beyond" to co-plan for instruction within and outside of contractual obligations to meet student needs; however, this is not a sustainable practice. The district has partnered with a contractual service to address master scheduling. This opportunity can potentially address scheduling challenges and has the potential to be more powerful in exploring a less ICT dependent instructional model to support students with disabilities in the general education setting. It is important the district continue to consider the provision of specially designed instruction through models less reliant on ICT.

- 60% of elementary school staff
- 57% of middle school staff
- 33% of high school staff
- 48% of all staff

Agree that HCSD has established standards for delivering co-teaching/collaborative instruction.

Staff Survey

Fifty-two percent of staff survey respondents agreed that there is sufficient communication between general and special educators about the needs and progress of students with IEPs. Comparatively, only 35 percent of respondents agreed that there is sufficient communication between special educators and teaching assistants/aides about the needs and progress of students with IEPs. In order for any instructional model to be effective, ensuring sufficient communication is prioritized for those providing instruction is key.

Thirty-eight percent of survey respondents disagree with the statement that staff in their building are provided adequate time and coverage to develop IEPs. Thirty-eight percent of survey respondents indicated that they did not know or that it is not applicable if staff in their building are provided adequate time and coverage to develop IEPs.

Thirty-eight percent of all survey respondents shared that general education teachers are provided adequate training in effectively supporting the needs of students with IEPs. Differences were noted, by respondent type, in their belief whether general educators receive adequate training to effectively support the needs of students with IEPs in the general education setting. Some roles demonstrated a higher level of disagreement that general education staff receive sufficient training to support students with IEPs in their classrooms.

While 87 percent of HCSD staff are confident in how to implement IEPs as written, only 43 percent of teaching assistants and aides agree. Another 43% of teaching assistants and aides reported "I don't know" or "not applicable" to this question.

Sixty percent of special educator survey respondents agree that special education teachers at my school are used effectively to support the needs of students with IEPs. Comparatively, 57% of general educator survey respondents agree that special education teachers at my school are used effectively to support the needs of students with IEPs.

- 50% of elementary school staff
- 86% of middle school staff
- 61% of high school staff
- 60% of all staff

Agree that special education teachers at their schools are used effectively to support the needs of students with IEPs.

Staff Survey

Academic Optimism, Growth Mindset, and Inclusive Practices in HCSD

As the field of education focuses on increasing student achievement, particularly for students with disabilities, in the United States, it is critical to examine the effect of research-based instructional practices or socioeconomic status on academic achievement, but also at any other factors that may potentially have a positive impact. The current achievement levels for students with disabilities nationwide are still behind that of their counterparts, which suggests that providing schools with extra funds and an aligned curriculum alone will not raise student achievement. As educational leaders are being held more responsible for academic growth, it is necessary not only to adequately identify those factors but to understand how a culture of academic optimism can cultivate a growth mindset and, therefore, achievement.

Dr. Wayne Hoy and his colleagues suggest that connecting three important characteristics of schools can produce a potent and positive influence on academic achievement, even in the face of low socioeconomic status, previous performance, and other demographic variables such as school size or minority enrollment.[50] Hoy's definition of "academic optimism" is grounded in social cognitive theory and positive psychology. It embraces the following characteristics:[51]

- ***Academic emphasis*** – the extent to which a school is driven by a belief system that includes high expectations for students to achieve academically

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

- ***Collective efficacy of the faculty*** – the belief that the faculty can make a positive difference in student learning
- ***Faculty's trust in parents and students*** – faculty, administrators, parents, and students cooperate to improve student learning; trust and cooperation among parents, teachers and students influences student attendance, persistent learning, and faculty experimentation with new practices

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

Dr. Carol Dweck's research on fixed versus growth mindset complements Dr. Hoy's work. Dweck's research supports that in a fixed mindset, students believe their basic abilities, their intelligence, their talents, are just fixed traits. They have a certain amount and "that's that," and then their goal becomes to look smart all the time and never challenging themselves in order to prevent others from thinking they are not smart. In a growth mindset, students understand that their talents and abilities can be developed through effort, good teaching, and persistence. They believe everyone can get smarter if they work at it. Teachers who believe in a growth mindset that all students can learn, support the academic optimism's construct. As teachers and students begin to believe that hard work, perseverance, and belief can change the student growth trajectory, a paradigm shift will take root within each school leading to maximum student and teacher success.[52] Students who believe (or are taught) that intellectual abilities are qualities that can be developed (as opposed to qualities that are fixed) tend to show higher achievement across challenging school transitions and greater course completion rates.[53]

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

The majority of staff (63.5%) across all role types believe that school administrators have high expectations for students with disabilities. It is important to note that 90% of special educators rated administrators as having high expectations of students with disabilities compared to 67 percent of general educators. That is key as it implies school administrators are demonstrating accountability for the success of students with disabilities. However, this raises a question about a disconnect between school administrators recognizing accountability for growth mindset and how that translates into practice for students with disabilities and practices at schools.

Inclusive Practices

According to data gathered from focus groups and interviews, the HCSD special education leadership and staff have adopted many inclusive practices to promote the well-being and success of students with disabilities. This perspective is supported by HCSD staff survey data. Overall, 88 percent of staff survey participants agree that their school provides an inclusive environment for students with disabilities. That is one of the higher overall agreement ratings in data collected as part of this study. HCSD parent survey

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

respondents (82%) believe their child's general and special education teachers have high expectations for their child.

HCSD staff provided resounding narrative support in the staff survey and focus groups echoing the importance of inclusivity and a growth mindset in the district:

- General education staff, aides, and HCSD collectively share a desire for students with disabilities to be included. This community describes the culture as incredibly supportive with an orientation towards inclusion.
- The district is intentional and works hard towards being inclusive.
- District leadership has a strong focus on inclusion. The vision is to expand the district's capacity to serve more complex and neurodivergent students through comprehensive programming in house.
- The district has high expectations for students with disabilities and meaningfully fosters success through the tight-knit community opportunities.

Analysis of the parent survey responses from this study supports the perspective that most individuals across the organization are embracing inclusion and practices to support inclusion. Approximately 76% of parent respondents indicated they agree their "child is a valued member of the school and is generally included in all academic and extracurricular activities." Middle school parents reported the highest level of agreement at 83% compared to high school parent respondents at 71%.

As a district, HCSD has laid the foundation for inclusive practices across buildings as demonstrated by staff feedback in surveys and focus groups. District leadership must continue to unify all schools to promote inclusive practices. Suggestions provided by focus group and interview participants to promote inclusivity include hiring more neurodivergent staff, expanding club/sport/extracurricular opportunities to become more inclusive, and ensuring shared accountability in parent and community presentations by both general and special education staff. All students with disabilities deserve consistent inclusive experiences and access to the core instruction in order to drive academic growth, regardless of building assignment or special education programming.

Several focus group and interview participants questioned the collective acceptance of students with disabilities amongst their peers. While this did not emerge as a consistent or major theme, it is important to acknowledge this feedback related to inclusive practices. Opportunities to facilitate meaningful social structured and unstructured opportunities between peer groups would benefit all students. HCSD Student Support Services staff are well positioned to lead professional development and coaching opportunities for district staff and students to promote meaningful inclusion amongst students.

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

- Consistently safe and accessible environments to promote student engagement
- Well defined behavioral expectations within the classrooms
- Elements of Universal Design for Learning
- Use of teaching assistants and aides to support instruction and behavior management
- Various co-teaching models

Practices that have been known to assist students with special education needs, such as use of data collection procedures and use of assistive or instructional technology, were not frequently observed during the school visits.

Early Childhood Supports and Services

Putnam County provides a number of placements for preschoolers eligible for special education and/or related services. HCSD does not offer preschool programs or servivces. The continuum of services for

young children with disabilities in the county include: 1) Preschool Itinerant Services (PIS) (such as Speech/Language services), Special Education Itinerant Teacher (SEIT), Special Class in an Integrated Setting (SCIS), and a Special Class (SC) with most preschoolers benefiting from a dual combining of programs.[54] In HCSD, a preschool child with a disability (PCWD) can receive services through the following placements:[55]

Exhibit 27. Preschool Special Education Continuum of Services

Related Services	Half Day Programs	Full Day Programs
• All Together Children's Services • Abilities First • Bright Beginnings • Putnam County • HTA of New York	• Abilities First • St. Francis • WestCop	• Abilities First • St. Francis • WestCop

As the district continues to expand programming, parents of preschoolers with disabilities are advocating for more self-contained options offered within the district. Respondents to the parent survey consistently reported limited, in district programming options as an area of growth, including in early childhood.

Transition Goals

In New York, Part 200 of the Commissioner's Regulations describe transition services as "a coordinated set of activities for a student with a disability, designed within a results-oriented process…the coordinated set of activities must be based on the student's strengths, preferences and interests, and shall include needed activities in the areas of instruction, related services, community experiences, the development of employment and other post-school adult living objectives and when appropriate, acquisition of daily living skills and provision of a functional vocational evaluation (Part 200.1(fff))."[56] Transition planning for students with disabilities in New York state and HCSD begins at age 15.[57]

According to district guidance, the following are components of HCSD' transition programming:[58]

- **Project Careers:** a vocational program for special education high school students. The goal of the program is to provide students with both the skills needed to graduate from high school and on- the-job training for a variety of entry level positions. This option is offered in very specific cases only and has had limited student participation over the years.
- **General Education Vocational Program:** All special education students have the option of participating in Career and Technical Education through BOCES if they qualify. There are numerous programs offered, giving students opportunities to explore a range of career options. High school and college credits are available, as is the prestigious Regents Diploma with a technical endorsement.

Additionally, the district deploys several New York state initiatives focused on diploma requirements unique to students with disabilities, including a Skills and Achievement Commencement Credential and the Local Diploma Compensatory Option.[59]

Parents of students with disabilities provided mixed feedback with their post-secondary transition experiences. Approximately, 50% of parents who responded to the survey indicated disagreement with the

[54] Draft Haldane Special Education Plan, 2022-2024
[55] id.
[56] Id.
[57] id.
[58] id.
[59] http://www.nysed.gov/curriculum-instruction/general-education-and-diploma-requirements

statements “the CSE team developed individualized goals related to postsecondary education, employment, independent living, and community participation for my child” and “the CSE team identified transition services to help my child.” Half of the same survey respondents disagreed that their child’s transition plan is preparing them for life after high school. Alternatively, 100% of HCSD special educators and Student Support Services staff (Psychologist, Nurse, Counselor, Social Worker, Behavior Interventionist) agree that the district is planning effective services and activities for postsecondary transition for students at age 14 at my school(s).

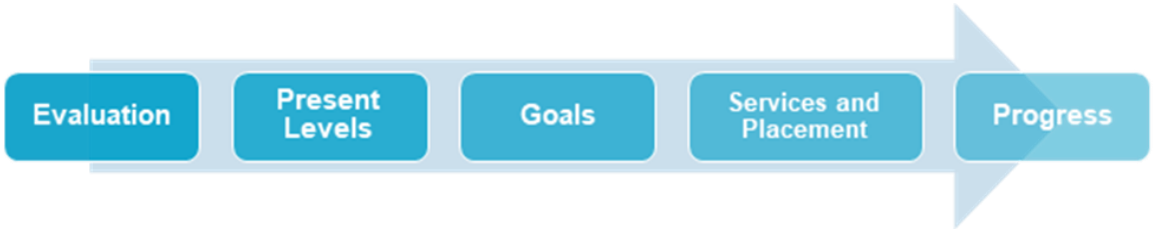
High Quality IEPs to Support a Student’s Individualized Program

Golden Thread Framework

PCG reviewed approximately five student IEP files during the file review focus groups to assess the overall quality of the content of IEPs developed by HCSD. Files reviewed were selected based on students’ primary disability category, school, gender, grade, and language status (English Language Learner students with a disability). No numerical value was assigned to each file when compared to the indicators below. A narrative summary is included as evidence for each indicator. While HCSD is continuing to clarify and standardize procedures, these data reflect IEP documents reviewed in the winter of 2023.

For a student with a disability, his or her CSE/IEP team is charged with ensuring that the evaluation supports the existence of a disability and shows a clear connection to the Present Levels of Academic Achievement and Functional Performance (PLAAFP) statement, identified learner characteristics, least restrictive environment considerations, and selected accommodations for instruction and assessment. This logical progression through the body of evidence, known as the ***Golden Thread***, should connect the pieces to tell a student’s complete educational story. PCG used the Using the Golden Thread framework and Quality Indicator Review protocol in its review of IEPs for this Purpose.

Exhibit 28. PCG's Golden Thread Framework



Evaluation - What are the student's characteristics as a learner? What is his/her documented disability? How do the evaluation results inform an instructional plan?

Present Levels - What is the student's present level of academic achievement and functional performance (PLAAFP)? How can access to grade-level standards be ensured regardless of the disability or language barrier?

Measurable Annual Goals - What can the child reasonably be expected to accomplish within one year? What types of instructional tasks are expected of the student to demonstrate proficiency in grade-level content? Are goals reasonably ambitious and achievable, and do they address all areas of need?

Services and Placement - What services will be provided? By whom and for how frequent? What accommodations are needed for learning in multiple settings? What services and supports are needed for the student to progress in all identified areas? Are accommodations documented and used as a foundation for classroom instruction and assessment? Where and how will the student receive services?

Progress Reports - What data are being collected on the fidelity of IEP implementation as well as on student progress toward meeting IEP goals? Is the student making progress?

Quality Indicator Review

This Quality Indicator Review, based on the tenets of the Golden Thread Framework, focuses on areas essential to the development of quality Evaluation, IEP, and Progress Monitoring documentation. Taken together, these documents for students with disabilities provide a comprehensive view of their access, participation, and progress in the general education curriculum and address other disability needs.

The quality indicators are based on these foundational assumptions:

- Results of individual evaluations provide the information the IEP team needs to make its recommendations.
- The student's strengths and needs guide IEP development.
- The IEP team considers the interrelationship of the impact of the student's disability and the components of the IEP.
- IEP development occurs in a structured, sequential manner.
- IEPs include documentation of recommendations in a clear and specific manner so the IEP can be implemented consistent with the evaluation team's recommendations.
- Annual goals are identified to enable the student to progress in the general education curriculum and meet other disability-related needs.
- The IEP team determines how student needs will be met in the least restrictive environment.
- The IEP team demonstrates knowledge of grade level general education curricular and behavioral expectations and benchmarks.
- IEPs are implemented with fidelity and adjusted based on student response to instruction.
- Ongoing progress monitoring and formative assessment of student progress, goals and objectives are consistently implemented.
- Revisions to the IEP are made based on data indicating changes in student needs or abilities.
- IEPs for students with disabilities developed by the evaluation team result in student access, participation and progress in the general education curriculum and address a student's other disability needs.[60]

PCG used five overarching quality indicators to assess files. The rubric included specific "look-fors," or classifications of evidence, under each indicator. Additional detail about this rubric is included in the appendix.

Quality Indicator Review Findings

A summary of these coded comments by area is included below.

Evaluation

- A variety of assessment tools were utilized to determine initial eligibility.
- Disability classification changed with no district conducted, disability specific assessment tools. The district adopted outside medical diagnosis without administering additional assessments or drafting a formal review of the medical information provided. It was reported that it is a district process to conduct additional assessments to confirm outside evaluation findings.
- Evaluation reports are often utilized by related service providers and special education teachers; however, are not consistently available to teaching teams. The evaluations are perceived by district staff as comprehensive and accessible in the document repository.

Present Levels of Academic and Functional Performance (PLAAFPs)

[60] The Quality Indicators are based on the New York State of Education (NYSED) "Quality Indicator Review and Resource Guide": http://www.p12.nysed.gov/specialed/techassist/CSE-IEP.htm

- Narrative PLAAFP data referencing classroom-based performance included both quantitative and qualitative measures.

Measurable Annual Goals

- IEPs reviewed appeared to have goals relevant and responsive to student specific areas of need.
- Goals assessed consistently addressed academic and social emotional student specific areas of need.

Services and Placement

- The limited LRE options within the district inherently limit eligible students to in class support, resource, or special class. IEPs reviewed indicated a variety of services and placement decisions based upon student need.
- Concerns expressed that co-taught model of instruction is not available in all courses.

Progress Reports

- It was reported that progress monitoring occurs differently across providers and special educators. Staff collect a variety of work samples and utilized structured observations, as designated by the IEP, to determine progress towards goals.
- Overall, the district utilizes a combination of narrative summaries and legend of codes to indicate progress.

Office of Civil Rights Complaints

Over the past two years, HCSD has had no US Department of Education, Office of Civil Rights (OCR) complaints.

Complaints to the New York State Education Department

Over the past three years, there have been no special education complaints filed to the New York State Department of Education (NYSED).

Hearings and Settlements in HCSD

Over the past two years, HCSD has had one due process hearing filed by parents. The complaint was withdrawn without prejudice.

Summary and Implications

HCSD prioritizes inclusion of students with disabilities through the implementation of various instructional models across all grade levels. However, at the same time, as learned through interviews and focus groups and witnessed during classroom visits, the district has demonstrated an overreliance on a singular instructional model as best practice (ICT). The perspective that ICT is the most appropriate instructional model for supporting students with disabilities in the general education setting was acknowledged in most focus groups. This model has not adhered to best practices that promote general education teacher/special education teacher partnerships and frequent collaboration. Subsequently, this has created limiting beliefs that the district must adopt ICT in all courses and hire a considerable number of special educators (1:1 for all grade levels). Further, there is an explicit need to design and offer specialized programs from preschool through high school for students with more significant disabilities. The size of the district makes this a complex issue, yet creating a cooperative model in partnership with other districts is a promising approach.

The survey findings, coupled with qualitative data analysis and classroom visit data, support less reliance on the ICT instructional model for specially designed instruction provision and a greater focus on utilizing teaching moments effectively. Scheduling impacts, fostering meaningful co-planning, and maximizing

instructional opportunities will yield greater outcomes for students with disabilities in lieu of extending an existing model that may not be as effective as it was perceived to be.

VI. SPECIAL EDUCATION LEADERSHIP

Strengths

- **New Pupil Personnel Services (PPS) Leadership**. The district recently hired a new Director of PPS bringing many positive changes in process and culture.
- **PPS Budget Commitments**. The PPS Department leadership has made bold commitments to expanding the LRE continuum and strategizing to maximize outcomes for students with disabilities.

Opportunities for Improvement

- **PPS Leadership Changes**. Special education leadership changes resulting in struggling initiative implementation and consistency in vision.
- **Strategic Planning**. The district has intentions to build out a strategic plan for special education in alignment with budget commitments.

Leadership, Vision, and Strategic Planning

The Department of Pupil Personnel Services (PPS) is charged with ensuring that students with IEPs have a free and appropriate public education. With a responsibility that requires the consistent implementation of federal and local mandates, PPS is tasked with important, yet sometimes competing, responsibilities – a small staff managing all components of the special education process while also promoting practices to improve the outcomes of students with disabilities and ensuring the consistent adherence to the law.

The PPS has published its mission statement on the HCSD website on their department page. The department's mission is:

> *"Inclusion, social-emotional development, and innovation are the critical components of Pupil Personnel Services at Haldane. Inclusion is a philosophy of education that fosters a sense of community and empathy in our students. Building on that, we encourage our students to understand their own learning process and how that can be used to collaborate and communicate with others. Finally, innovation in how we deliver instruction and special services for the varied needs of all learners helps us prepare our students for lifelong success.*
>
> *Haldane aims to instruct all students in the manner befitting them, and our continuum of special services reflects that objective. We have high expectations for each student, and we carefully develop programs and services to target skills and achieve progress. Professional teaching and learning spurs ongoing program development and reflection of program efficacy. We are dedicated to the needs of our students and families, so please feel free to call, email, or come see us."*

In June 2022, a new Director of PPS was appointed. Having diagnostic and leadership experience, the new director is viewed as well-respected, knowledgeable, and responsive. Focus group participants shared that this change in leadership, which is grounded in a deep understanding of special education practices, has been "a huge asset" and that the PPS is now seen as collaborative, communicative, and laser focused on advocating for and improving the experience of students with disabilities in HCSD.

The district has endured a series of leadership changes within this role. It was acknowledged that there have been nine Directors within the last 20 years which has led to other challenges related to sustainable practices and clarity in expectations. The changes in leadership have left some HCSD staff feeling frustrated at times when new initiatives are rolled out with minimal traction before the individual leaves the role. The PPS Director role is unique as it multifaceted, requiring both practitioner and leadership expectations. Individuals serving in this role are responsible for: 1) the vision, strategic planning, execution, and management of the district's special education processes, 2) the coordination of the Committee on Preschool Special Education (CPSE) program and with conducting CPSE and CSE meetings, 3)

overseeing eligibility criteria and chairing meetings for 504 plans, and 4) staff evaluation and oversight. The breadth and depth of responsibilities associated with the Director of PPS role can influence the district's ability to retain talented leaders. In order for HCSD to maintain best practices for students with disabilities and continue executing the district's special education mission, leadership must prioritize how to retain highly qualified talent. District leadership should explore how other special education staff can share responsibilities associated with the practitioner elements of this role to accommodate leadership growth.

The vision and priorities of the PPS are continuing to evolve. It was acknowledged that a key priority will be for the PPS Department to create a formalized vision. As many focus group participants shared, the PPS is at a crossroads, actively working on how it is reimagining and redesigning support to schools in a more modern and innovative way.

The PPS' strategic planning perspectives, highlighted by focus group and interview participants, during this review are grouped into three areas:

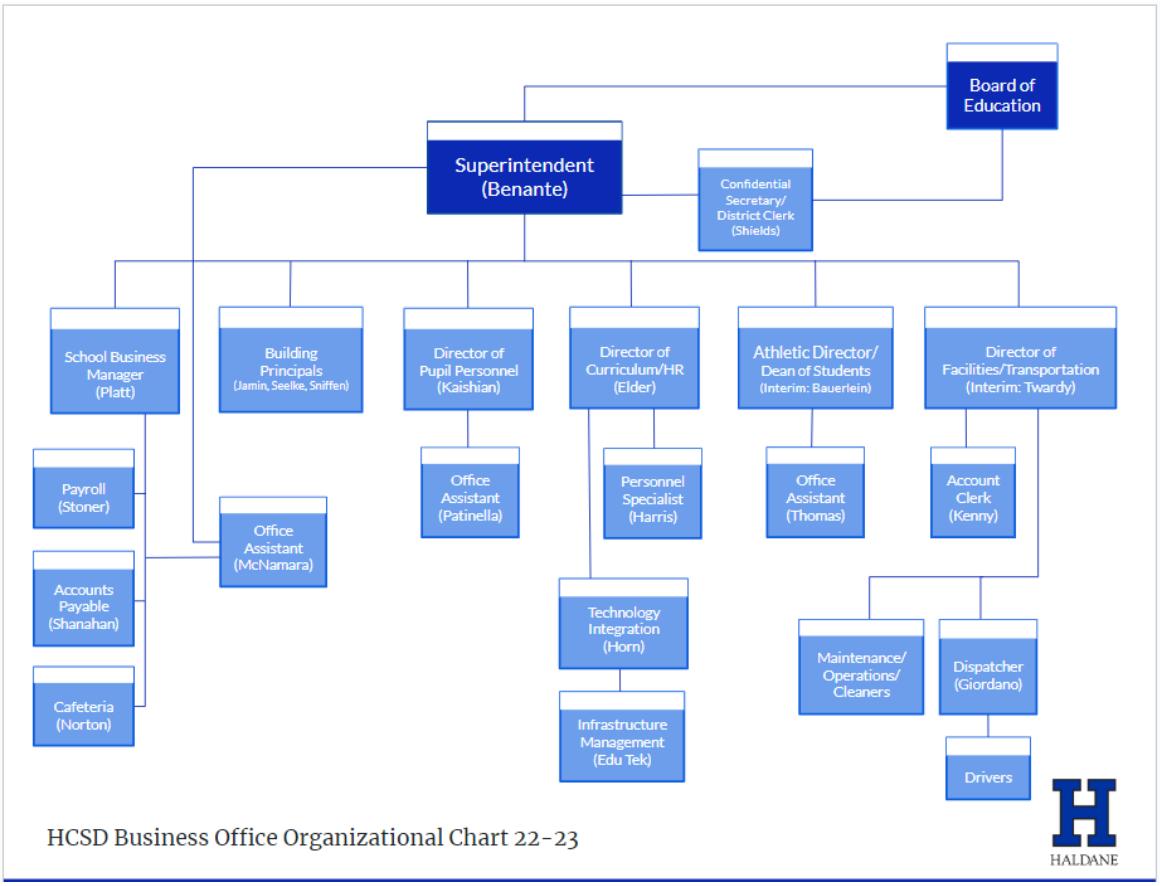
1. Inclusion
   - Address structural and cultural barriers impacting inclusion, such as scheduling, staffing, and space. These are being addressed with existing initiatives (Strategic Coherence Plan, special education audit, budget planning, etc.) and will continue to evolve.
2. Retaining High Quality Staff
   - Hire and/or retain high quality staff capable of shifting into evolving roles to meet student needs. Continue to offer competitive pay, identify how to "grow your own" staff, and maximize existing staff's talents.
3. Expansion of Continuum of Placements
   - Assess and plan for how the district can expand the continuum of placements to accommodate more students with disabilities. A specific focus will be paid to determine the feasibility of specialized programming offered at out of district placements and how best to cost-share opportunities for programming with other districts.

Focus group participants also shared other areas they would like to see the PPS focus on from a large-scale, strategic perspective. Those who are campus-based noted that having these priority areas clearly stated is a help to them, and that they requested that there could be support in developing building-level goals to align to the PPS ones. Given the disparity of students with IEPs and their non-disabled peers on standardized tests, some also shared that there also needs to be considerable attention paid to how students with disabilities meaningfully access grade-level content.

Organizational Structure Supporting Special Education Services

The following organizational chart shows the district's leadership structure.

Exhibit 29. HCSD Organizational Chart, 2022-23



The HCSD Department of Pupil Personnel Services consists of the following:

- Director of Pupil Personnel Services
- Administrative Assistant
- CSE/CPSE School Psychologist

All special education staff, including teaching assistants/aides and CSE team members, are school based. While special education teachers and assistants/aides are assigned to single school buildings, others such as school psychologists, speech therapists, and occupational therapists, are shared across buildings. One limitation of the current staffing in PPS is the 1.6 school psychologist roles, especially given the evaluation responsibilities for students residing in district boundaries but attending private schools. Additionally, because the PPS office does not have a full-time CSE chair and no assistant director role, many of the functions that would be handled by those staff roles are fulfilled by the administrative assistant role, leading to less capacity of the PPS office to continue to grow and set up better systems.

Department of Pupil Personnel Services Standard Operating Procedures

In PCG's experience, highly effective Departments of Pupil Personnel Services have a standard operating procedure manual. This manual typically is inclusive of Board approved policies as well as state and federal code and it offers the step-by-step "how to" on policies and procedures that impact special education. It is intended as a resource for district staff, administration, and community stakeholders. It can serve as a resource for decisions relating to a child's special education program, including but not limited to identification; subsequent evaluation(s); classification; development and review of a child's IEP; educational placement of a child; annual IEP Meetings; triennial reevaluations;

accommodations protocols; and assistive technology procurement and service delivery protocols. It should provide clear definitions about district practices. In addition, it should be highly accessible, online and in a format that is easy to navigate.

HCSD has a current draft of a special education guidance document. The document, titled “Haldane Central School District Special Education District Plan 2022-2024”, outlines evaluation objectives for special education programs, the nature and scope of special education programs and services, special education board policies, etc. A standard operating procedure manual connecting district guidance with step-by-step, “how to” of HCSD special education was not provided as part of this review. Focus group and interview participants mentioned that a standard operating procedure manual does not exist. IEP development standards and processes, responsibilities by role related to special education procedures, and assessment and evaluation district expectations should be included as each was highlighted as an area of growth as part of this review.

Summary and Implications

Consistency in special education leadership and the creation of a district-wide vision for students with disabilities in HCSD will be transformational. Prioritizing the development, training, and monitoring strategies for standard operating procedures will eliminate existing barriers for students with disabilities. It is critical that the district establish a special education vision and standard operating procedures to be implemented by district leadership, as well as a plan that allows for leadership growth of special education staff that supports their development in addition to building a structure that enhances the capacity of the PPS Director.

VII. FAMILY AND COMMUNITY ENGAGEMENT

Strengths

- **Engaged Parents**. The Learning Differences Committee and parents of students with disabilities are active partners in HCSD's special education initiatives and serve as strong advocates for students and their families.
- **Close-knit Community**. HCSD is a small, close knit district allowing staff to create long-term and meaningful relationships with students and parents.
- **Staff Dedicated to Partnership**. Special and general education staff demonstrate a commitment to collaborating to promote positive outcomes for students with disabilities.

Opportunities for Improvement

- **Expectations and Services**. A proportion of parents of students with IEPs believe the district can improve on services (continuum, instruction, extracurriculars) offered.
- **Communication**. Parents report that communication breakdowns exist between school and home and district and home about IEP implementation, transitions, and student progress.

Collaboration and Communication

Parents are a child's first teacher and are important partners as their children progress through school. Their vital role is acknowledged in IDEA which requires parental input in writing IEP goals, the provision of related services, and placements. IDEA also requires collaboration with parents and students with disabilities to design and implement special education services. As part of this review, a research question specifically examined the strengths and opportunities for improvement with respect to the District's Learning Differences Committee and partnership with the school district.

HCSD has a thriving Learning Differences Committee (LDC). The LDC "works to ensure that ALL students in our community are seen, heard, and included- and that they have the necessary tools and supports for them to thrive."[61] It serves as a joint committee between the Parent Teacher Associations of HCSD and Garrison Union Free School District (GUFS) to give "parents, teachers, and administrators a forum to partner around identifying and supporting learning differences common in our schools and communities."[62] Both equity and inclusion function as "core tenets of our committee with a focus on neurodiversity and disability rights…to educate against the discrimination and stigma often associated with difference in all its myriad forms: visible and invisible, physical, and neurological."[63] Parents of students with disabilities have the opportunity to participate in bi-monthly meetings in a safe and confidential space. Additional resources are available on the LDC website for parents of students with disabilities in the district.

Two key themes emerged when analyzing feedback from parent participants as part of this review: collaboration and communication. A considerable amount of positive input related to collaboration and communication was shared. Parents expressed that HCSD staff and special education leadership demonstrated incredible flexibility throughout the COVID-19 pandemic and the return of in-person instruction to accommodate students with disabilities. New leadership has begun creating a culture of consistent and responsive communication which, reportedly, is different from previous experiences. Over time, these processes and expectations will continue to evolve to meet parent and student needs. There is little "pushback" on needs for students with disabilities, particularly when backed up by medical data.

[61] https://learning-differences-committee.mailchimpsites.com/
[62] id.
[63] id.

Strong teaching teams and the ICT model support inclusive opportunities for students with disabilities in HCSD.

Parents of students receiving special education services provided narrative feedback as part of the parent survey. The open-ended responses were coded for themes. Several themes emerged, including parents expressing sincere gratitude and appreciation for HCSD's efforts to support their students:

- Prioritizing hiring highly qualified staff, including the new PPS Director, has had a positive impact for students with disabilities in HCSD.
- Teaching, Student Support Services, and Related Services staff are supportive, accommodating, kind, provides individualized attention, knowledgeable, welcoming, and flexible.

There are opportunities for improvement between HCSD collaborating and communicating with parents of students with disabilities. Several key sub-themes emerged when analyzing focus group and survey data: 1) the perception of "outsourcing" special education, 2) the risk of out of district placements if students do not progress quickly enough or settling for limited academic progress to remain in the district, 3) limited staff to provide ICT instructional models throughout the day for all students with disabilities in all courses, and 4) overreliance on parents of students with disabilities to advocate and monitor academic performance.

Parent survey respondents indicated high levels of agreement related to communication and collaboration with their student's teaching team. Specifically, 88 percent of parents agree that their student's teachers communicate well with them; 94 percent of parents believe that teachers respond to their concerns within a reasonable time; and 91 percent of parent respondents have a good working relationship their child's teacher.

Students with disabilities being educated in the general education environment with fidelity requires collaboration between general and special educators. Pre-K survey parent responses support the need for more inclusive opportunities for young children with disabilities to have access to the general education setting. Only 66 percent of Pre-K parents agreed that the IEP team discussed receiving special education services in the general education class compared to 80 percent of elementary parents.

Most HCSD staff believed IEP development involves collaboration between general education teachers, special educators, and parents (78%). Additionally, staff believed parents are given a meaningful opportunity to participate in CSE meetings (74%). However, there is an opportunity for parents to be provided adequate training to support students with IEPs at home. Only 15 percent of parents were in agreement that they were provided adequate training to support students with IEPs. Approximately 63 percent of HCSD staff survey respondents reported being unsure if parents were providing adequate supports for students with disabilities at home.

Summary and Implications

HCSD has a great resource in the parents and families of students with disabilities. There is work that needs to be done to improve the perceptions of parents who believe the district is limiting access to in district opportunities for students with more significant manifestations of their disabilities and how multiple instructional models are deployed throughout the district to support students with disabilities. To set the stage, HCSD will need to continue to emphasize collaborative relationship building, and communication that strengthens the connection between school and home. These are attainable through structured expectations for communication and shared accountability in ensuring students with disabilities are appropriately served by HCSD.

VIII. BUDGET AND STAFFING

Strengths

- **Student-Centered Budgeting**. Schools take a student-centered approach to scheduling special education services and to allocating resources to support their needs.

Opportunities for Improvement

- **Out of District Placements**. Out of district placements are the biggest cost driver for PPS's budget.
- **Cooperative District Partnerships.** HCSD has explored partnering with neighboring districts to share costs for a specialized class.

Special Education District Budget Comparisons

Below PCG compares special education budget information to other comparable New York districts. The comparison districts are:

- Dobbs Ferry UFSD
- Millbrook CSD
- Pawling CSD
- Red Hook CSD
- Spackenkill UFSD
- Valhalla UFSD

PCG conducted the analysis using the *New York State Report Cards*. The following few exhibits compare district budget information.

Exhibit 30. 2021-22 Peer Districts Expenditures on Special Education

	Total Number of Students	% of Students with Disabilities	Special Education School Level Costs Per Student
Haldane CSD	777	12%	$25,822.68
Dobbs Ferry UFSD	1,510	14%	$26,251.44
Millbrook CSD	842	17%	$16,808.92
Pawling CSD	1,103	14%	$21,686.25
Red Hook CSD	1,645	14%	$37,933.29
Spackenkill UFSD	1,459	12%	$21,651.27
Valhalla UFSD	1,357	11%	$33,151.61

Of the comparable districts, three (Dobbs Ferry, Red Hook, and Valhalla) have a higher per student special education expenditure rate than HCSD.

HCSD's Budget

The Director of PPS used the following guiding principles when making budget recommendations to the Superintendent of Schools.



For the 2022-23 school year, PPS identified the following budgetary considerations.

- Evaluating the capacity for creating a Special Class at Haldane to support diverse learners;
- Collaborating with neighboring districts to determine whether a consortium model might benefit more students;
- Continue to develop a comprehensive MTSS to support all learners, to extend our continuum of special education services in the LRE, and to prioritize efficient use of resources;
- Fostering understanding via professional learning about divergent learners and Universal Design for Learning (UDL);
- Considering ways to alleviate the need for extra period assignments at the high school, while also creating a more robust continuum of services; and
- Prioritizing mental health and wellness by assessing resources and increasing access to community-based resources.

The PPS Department Budget has continued to grow over time as outlined below. The budget is comprised of many different costs. Budget components can include but are not limited to: instructional salaries, BOCES services and contracts, tuition, non-instructional salaries, foster care tuition, contractual expenses, tutoring services, service contracts, evaluations, materials and supplies (K-12), and testing supplies. The following is a budget summary from the past several years.

Exhibit 31. PPS Budget Summary, 2019-20 to 2021-22

Year	Budgeted	Actual
2019-2020	$2,909,700	$2,802,843
2020-2021	$3,030,555	$2,671,332
2021-2022	$3,065,030	$2,863,370
2022-2023	$3,206,356	$3,191,000
2023-2024	$3,587,813	TBD

A large portion of the PPS budget over the past several years has been dedicated to tuition for out of district placements through BOCES and elsewhere. For the 2021-22 school year, the total expenditure was $785,500, approximately 27% of the total PPS budget.

Staffing Allocations and Analysis

Comparative student-to-personnel ratios are useful for school districts to benchmark their staffing levels. The data discussed below were collected by PCG team members through their participation in reviews conducted by PCG, the Council of the Great City Schools, and the Urban Special Education Collaborative.

The ratios reported below are provided for special educators, paraprofessionals, speech/language pathologists, and psychologists, nurses, occupational therapists (OTs), and physical therapists (PTs). The figures do not reflect actual caseload ratios for each of these personnel areas based on student IEPs. Rather, they are based on full-time equivalent (FTE) staff members. The total FTE count for each area is compared to the total number of students with IEPs in the district. HCSD ratios are compared to 90 other school districts on which we have data. However, there are some districts who did not report data in each area.

The data do not give precise comparisons due to a variety of factors that impact how districts collect and report data. For example, some districts include contractual personnel and others exclude them, and data are sometimes affected by varying placement types used by school districts. The data may count all students with IEPs, including those placed in charters, agencies, and nonpublic schools, while other districts do not count these. The outcomes of the staffing ratio analysis should be used to investigate, along with other information, the extent to which personnel in areas outside the norm are being used effectively, how they are meeting the needs of students, and whether adjustments are warranted.

Special Educators and Special Education Assistants/Aides

The exhibit below shows the district's students with IEPs-to-personnel ratios for the areas of special educators and assistants/aides.

- **Special Educators.** With 10 full-time-equivalent (FTE) special education teachers, HCSD has an average of 9.3 students with IEPs for every special educator. HCSD's 9.3 ratio is lower than the overall 14 students to special education teacher average, ranking the district as 12th among 91 other reporting districts.
- **Assistants/Aides.** With 8.7 FTE positions, HCSD has an average of 10.7 students with IEPs for every assistant/aide. HCDS's ratio is lower than the overall 15.3 students to assistant/aide average, ranking HCSD as 31st among 90 other reporting districts.

Exhibit 32. Average Number of Students for Each Special Educator and for Special Education Assistants/Aides

	Special Educators	Assistants/Aides
Number of HCSD Staff FTE	10	8.7
HCSD Students w/IEP-to-Staff Ratios	9.3:1	10.7:1

All District Average Ratios	14:1	15.3:1
HCSD Ranking Among Districts111F_[64]	12th of 91 reporting districts	31st of 90 reporting districts

Student Support Personnel

The exhibit below shows the district's students with IEPs-to-personnel ratios for social workers, psychologists, and nurses.

- **Social Workers.** HCSD has 2 social workers. There are 46.5 students with IEPs for each social worker, which is a lower ratio than the all-district average of 615.7 per social worker. HCSD ranks 12th of 67 reporting districts.
- **Psychologists.** HCSD has 1.6 psychologists. There are 58.1 students with IEPs for each psychologist, which is a lower ratio than the all-district average of 175.8 per psychologist. HCSD ranks 5th of 88 reporting districts.
- **Nurses.** HCSD has 1.75 nurses. There are 53 students with IEPs for each nurse, which is a lower ratio than the all-district average of 723.7 per nurse. HCSD ranks 23rd of 80 reporting districts.

Exhibit 33. Average Number of Students for Student Support Personnel: Social Workers, Psychologists, and Nurses.

	Social Workers	Psychologists	Nurses
Number of HCSD Staff FTE	2	1.6	1.75
HCSD Students w/IEP-to-Staff Ratios	46.5:1	58.1:1	53:1
All District Average Ratios	615.7:1	175.8:1	827:1
HCSD Ranking Among Districts_[65]	9th of 89 reporting districts	5th of 88 reporting districts	29th of 80 reporting districts

Related Service Providers

The exhibit below shows the district's students with IEPs-to-personnel ratios for speech/language pathologists and occupational therapists.

- **Speech/Language Pathologist (SLP).** There are 2 FTE speech/language pathologists. There are 46.4 students with IEPs for each SLP, which is lower than the all-district average of 615.7 per SLP. HCSD ranks 6th of 91 reporting districts.
- **Occupational Therapists.** HCSD has 1 occupational therapist. There are 93 students with IEPs for each occupational therapist, which is a lower ratio than the all-district average of 1285.8 per occupational therapist. HCSD ranks 22nd of 86 reporting districts.

Exhibit 34. Average Number of Students for Related Service Providers: Speech/Language Pathologists and Occupational Therapists

	Speech/Language Pathologists	Occupational Therapists
Number of HCSD Staff FTE	2	1
HCSD Students w/IEP-to-Staff Ratios	46.5:1	93:1
All District Average Ratios	615.7:1	1285.8:1

[64] Ranking begins with districts having a low average number of students to one staff person.
[65] id.

HCSD Ranking Among Districts[66]	6th of 91 reporting districts	22nd of 86 reporting districts

HCSD also employees a 0.5 contracted physical therapist.

Feedback on the Allocation Process

Feedback was provided by focus group and interview participants speaking to the fluidity applied when addressing allocations based on building, programs, enrollment, and student numbers/need. Given the small size of the district, careful attention is paid to aligning staff to individual student needs and IEP requirements.

In addition to the quantitative analysis, school-based staff shared concerns about the allocation process and staffing models overall. The following are insights from focus group and interview participants.

Staffing Allocations

- There is a perception that staffing inequities exist across buildings and within roles.
- There is insufficient staffing for special educators to support workload, role responsibilities, and the desire for an ICT instructional model across all courses.
- There is a request for a 1:1 pairing of special educators and general educators for all grade level classes.
- The district needs equitable staffing allocations across schools to maximize service provision and comparable workloads.
- The district should deploy a flexible staffing model to meet student needs and balance workloads.
- There should be ongoing processes to determine how HCSD staff are best utilized and allocated.

Scheduling

- Some HCSD student-facing staff feel overwhelmed by their caseloads and meeting scheduling expectations for all students across grade levels.
- HCSD staff are going above and beyond to meet student needs despite increases in caseloads and scheduling challenges.
- Some staff may be overutilized and some staff may be underutilized in their current capacity. For example, some special educators may have caseloads considerably lower than peers, and there is no expectation to provide differential support to peers to balance workload.
- Scheduling needs dictate staffing allocations and impact caseloads. Staffing needs though are driven by student need and IEP requirements.

Staffing Hiring and Retention

HCSD generally does not have recruitment or retention challenges. According to focus group and interview participants, open positions come up rarely and are filled quickly with suitable candidates, despite having to compete with other districts in the area. They also shared that they believe the District offers comparable wages, is geographically isolated, and can look to districts in relative proximity for recruitment and retention inspiration. School leaders noted that though their current teaching positions are filled, not much more can be done in their schools in terms of service delivery without hiring more staff. Focus group and interview participants consistently highlighted concerns regarding the time necessary to solidify strong co-teaching pairs is not feasible within the existing staffing structure, particularly at the high school level.

[66] id.

Individuals serving in the teaching assistant and aide capacity are not perceived to be equitably treated through pay, full-time positions, or professional learning.

Many focus group participants shared that the staff in HCSD are, on the whole, talented, knowledgeable, and know their craft. The perception exists that retention can be attributed to the longstanding relationships established among the teaching teams and families. This cohesive community has fostered long-standing relationships between parents, students, and HCSD staff. Throughout the focus group and interview process, HCSD frequently acknowledged how the "family" orientation of the district at-large promotes both tenure and quickly filled vacancies.

Professional Development

Quality teaching in all classrooms and skilled leadership in all schools will not occur by accident. It requires the design and implementation of the most powerful forms of professional development. High quality professional development must be sustained, intensive, and classroom-focused (not one-day or short-term workshops or conferences) to have a positive and lasting impact on classroom instruction and teacher's performance. Research reports that elementary school teachers who received substantial professional development—an average of 49 hours—boosted their students' achievement by about 21 percentile points.[67]

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

- The duration of professional development must be significant and ongoing to allow time for teachers to learn a new strategy and grapple with the implementation problem.
- There must be support for a teacher during the implementation stage that addresses the specific challenges of changing classroom practice.
- Teachers' initial exposure to a concept should not be passive, but rather should engage teachers through varied approaches so they can participate actively in making sense of a new practice.
- Modeling has been found to be a highly effective way to introduce a new concept and help teachers understand a new practice.
- The content presented to teachers shouldn't be generic, but instead grounded in the teacher's discipline (for middle school and high school teachers) or grade-level (for elementary school teachers).[68]

In HCSD, professional development is guided by the district's Professional Learning Plan (PLP) initiated throughout the 2020-2021 and 2021-2022 school years in collaboration with members of the Haldane Curriculum Council. The purpose of the PLP is "to improve the quality of teaching and education in the school district by creating alignment between the professional learning experiences in which our teachers engage, their practices in the classroom, and the needs of the students of the Haldane Central School District."[69] A needs assessment, focused on educator's previous professional learning experiences, and perceived strengths and areas of improvement, was conducted to inform the development of the PLP. Three professional learning goals were identified following the needs assessment:[70]

- Goal 1: Professional learning will be designed and implemented to support the development of curriculum that is aligned with New York State Standards for Learning and the Haldane Essentials.

[67] Reviewing the evidence on how teacher professional development affects student achievement. Issues & Answers. REL 2007-No. 033. Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance, Southwest Regional Educational Laboratory, October 2007. Findings based on nine studies that meet What Works Clearinghouse standards.
[68] id.
[69] HCSD Professional Learning Plan, November 2022
[70] id.

- Goal 2: Professional learning will be designed in a manner that allows educators to engage in department/content-specific learning, as well as individual interests relevant to their area of practice.
- Goal 3: Professional learning will be designed and implemented to support educators in their implementation of culturally responsive and sustaining practices.

The HCSD PLP outlines a variety of methodologies ensuring staff have access to meaningful professional learning this school year. Staff members can access professional learning in HCSD through mentoring, After School Staff Development (ASSD), Professional Learning Days (Superintendent Conference Days-4 for the 2022-2023SY), summer workshops, an infusion of professional learning into faculty, team, grade level, and department meetings, for example. It is important to note that the opportunities outlined in the district's PLP appear to be available only to: "holders of professional teaching certificates, educational leadership certificates, and Level III teaching assistants."[71]

Professional development offerings in HCSD during recent school years covered a range of topics. A central focus was the need for a variety of professional development opportunities to meet the diverse needs of all HCSD staff. According to data provided by district leaders as part of this review, offerings included:

- Universal Design for Learning:
    - A brief introduction in fall 2022 during Superintendent's Conference Day for special education teachers K-12.
    - Worked with using the UDL principles to support special education teachers as they worked with curriculum mapping and planning with their general education teacher partners.
    - Showed the Unit Design format being used by the district and discussed how to incorporate UDL principles in the unit.
- ASSDs (10 hours):
    - Teachers are required to participate in 10 hours of professional development each year beyond their school day.
    - The administration can mandate up to 7 of those hours for required professional development, and teachers can seek approval for the rest of the others on topics of their choice.
    - If a faculty member wants to deliver an ASSD to colleagues, they earn double the hours.
- Facing History (Equity and Inclusion):
    - District-wide training to address our own beliefs, understandings, and biases. This training was provided last year to the high school faculty and staff and was extended this year to elementary and middle school faculty and staff. There is ongoing curriculum support for the secondary grades and the District will conduct follow-up staff development for elementary staff.
- Literacy Consultant:
    - Hired to support literacy at the elementary level. Teacher Consultants were trained using the Reader and Writer Workshop models of literacy instruction (Balanced Literacy), however current focus is on using more strategies from the Science of Reading.
- Preventing Academic Failure (PAF) Training:
    - Initially introduced to add to the District's MTSS catalog, the training provided a multi-sensory approach to teaching reading to two Literacy Specialists and two special class ELA teachers via Putnam Northern Westchester (PNW) Boards of Cooperative Educational Services (BOCES) during the Summer of 2022. PAF is now available as a Tier

[71] HCSD Professional Learning Plan, November 2022

III support. This initiative is intended to expand to include all three special education teachers in elementary school this Summer of 2023.

- ICT Training:
    - Goldmansaur and Rutherford provided PD and coaching for the ICT co-teach model in 2019-2020 SY. Training involved planning, observations, and post-meetings with the teams afterwards to offer strategies on differentiation and the use of a variety of co-teaching models.
- Mental Health and Threat Assessment Training
- Monthly Special Education Department Meetings (10 annually)
- Training for Teaching Assistants and Aides:
    - How to best support students and foster increasing independence, using a strength-based approach and positive reinforcement; playground support to facilitate cooperative play.
- IEP Writing Training at PNW BOCES for special educators

Focus group participants shared several insights, consistent across groups, as to the overall nature of professional development in HCSD. First, it was noted that the district typically allows one staff member to attend a training with the expectation they "turnkey" it and offer the content to peers. District staff highlighted a willingness to partner with peers to share information, particularly with individuals serving in the teaching assistant and aide roles. Individuals in this role have the least amount of professional learning opportunities and formal training. It was acknowledged across many different groups that this role could benefit most from extensive support because they are working directly with students with disabilities.

HCSD staff survey respondents answered several questions related to professional learning in the district. Approximately half of all respondents (51%) believe that professional development offerings they have attended enable them to better support the teaching/learning of students with IEPs and 92 percent of survey respondents believe staff supporting students with IEPs would benefit from additional professional development on the following topics:

- Increasingly intensive Reading interventions (87% agreement)
- Increasingly intensive Math interventions (80% agreement)
- Positive Behavior Intervention and Supports (91% agreement)
- Response to Intervention (RtI) or Multi-Tiered System of Supports (MTSS) (86% agreement)
- Facilitating inclusion in general education (94% agreement)
- Developing functional behavior assessments (FBAs) (78% agreement)
- Specific disability information (89% agreement)
- Assistive Technology (83% agreement)
- Collaborating with Paraprofessionals (89% agreement)

Summary and Implications

HCSD has a strong professional development structure in place to address the diverse needs of students with and without disabilities. Teaching assistants and aides participating in professional development opportunities is a unique approach to best maximize the efforts of these team members within the context of their roles. Individuals serving in this role would benefit from a formalized professional learning structure.

HCSD is overall well-resourced financially and makes significant contributions to instruction and related services staffing. When reviewing special education instruction costs per student with disability, HCSD falls in the middle of the six districts reviewed in its special education costs. For HCSD to meet RDA/SPP targets, effective, high-yield collaborative practices will be needed. To implement these practices district-wide, an effective inclusive education teacher allocation model will need to be in

place. HCSD's allocations formula does currently account for the expansion of inclusive practices. The district is partnering with an outside agency to support master scheduling across the three schools. This initiative has the potential to make significant positive impacts on HCSD time and better utilization of instructional resources to promote positive outcomes for students with disabilities. Further, the district will need to continue to explore more cost-effective options to supporting students with significant disabilities, such as through partnerships with neighboring districts.

IX. RECOMMENDATIONS

PCG saw ample evidence that HCSD has a solid foundation on which to build. HCSD has many notable strengths, including its passionate and knowledgeable staff and its willingness to undertake this review and act on the recommendations as part of a continuous improvement cycle.

The following recommendations are considered priority recommendations. Each is interrelated and will require a significant investment on the part of HCSD to undertake. Implementation of these recommendations will set the foundation for all other action steps that emerge from this report. The action steps listed under each recommendation below are organized in a manner that provides a comprehensive view of the activities required to initiate change. Although components of the action steps can be implemented within a shorter timeframe, full-scale implementation of the recommendations may take three to five years. Action steps corresponding to the recommendations are included below.

1. Districtwide Vision for Special Education

- **Collaborative vision.** With representatives of district leadership, HCSD staff as well as parents of students with disabilities, create a collaborative, districtwide vision for special education. Based on these discussions, create a core belief vision statement of agreed-upon ideals. Share it with other stakeholders to build momentum for the cohesive approach for special education provision.

2. Universal Design for Learning

- **Training**. Provide clear guidance and training for all district and school leaders, and teachers on the principles of UDL and how these principles can be applied in the development of curriculum, instruction, and assessment. Leverage staff who previously received UDL training to help guide training content based on their lessons learned and to actively support the training process.
- **Implementation**. Use UDL principles consistently so that all students can access grade-level material and can help close achievement gaps between students with disabilities and their non-disabled peers.

3. Disproportionality Monitoring

- **Tracking disproportionality in disability identification and educational setting**. At least quarterly, use the risk ratio to measure the identification rates of students with IEPs by race/ethnicity and other important indicators, such as educational setting, language status, free and reduced lunch status, giftedness, etc., to identify any student group that it is two and a half times more likely than peers to be identified as being over-identified and/or placed in a more restrictive setting (i.e., risk ratios).
- **Data review and hypotheses**. With a cross-departmental group of leaders and staff, use this data to develop hypotheses for identified disproportionate risk ratios for any group of students, delays in the evaluation referrals and completions, and/or schools with disproportionately high new identification rates.
- **Follow-up action**. Based on these hypotheses, develop any additional written guidance needed to clarify procedures and practices, consider any additional resources and strategies needed along with a written plan, if appropriate, and provide training to support implementation. For example, identification disproportionality training would include the implications of race/ethnicity/language, socio-economic status, and culture constructs for school-based teams when considering students for an evaluation.
- **Monitoring**. Based on the areas of practice identified through the above activities, identify data to be collected and monitored, along with any practices to be monitored, to support consistent implementation across HCSD and to identify schools needing additional support or intervention.

4. Inclusive Practices

- **Inclusive education framework**. Develop and use a structured framework/model that will help promote and support the consistent implementation of best practices for inclusive education including the provision of high yield collaborative teaching, specially designed instruction and related services.
- **Implementation guide**. Develop a clearly articulated district/school implementation guide based on the inclusive education framework with expected guidance, procedures and practices. Determine the role of schools to adapt the framework to their unique needs versus HCSD requirements. This process could also include HCSD's advance approval for a school to adapt the framework with deviations the district defines as significant.
- **Scheduled time for collaboration**. Establish written guidance for the use of inclusive master school schedules, which establish common planning time for collaborative teaching, co-teaching, and other activities for general educators with special education and other personnel. Develop various scheduling models that schools could use and/or adapt.
- **Cross-department collaboration**. Through intentional collaboration between PPS and Curriculum and Instruction, further study achievement gaps between students with IEPs and their typically developing peers on state standardized assessments, and between students with IEPs by race/ethnicity, English learner status, social economic status, gender, etc. Use this information to inform discussions about improving HCSD's continuum of services, including making inclusive instruction more effective.

5. Instructional Model and Service Delivery Continuum

- **Reconstruct instructional models.** Based on this program review, identify if the district wants to explore a full-time ICT model for all courses or if a more diversified approach, such as consultative teaching, can be explored. Furthermore, do not limit resources to a particular instructional model. Instead allow for flexibility so learning materials and other resources are allocated based on student need and not dictated by a particular model. Document the models with written information to inform professional development and resource needs.
    - **Co-taught instruction.** Draft guidance for the delivery of co-taught instruction based on the most effective model for instruction purposes and use of the special educator. Based on the developed guidance, provide intensive professional development and follow-up coaching and modeling to give co-teachers the information and support they need to be true partners in the planning and delivery of classroom instruction. Monitor implementation through classroom walk through activities that are guided by observation protocol for this purpose.
    - **Consultative teaching.** Draft guidance for the delivery of consultative teaching to support students with disabilities. Under this model, special educators (e.g., special educator, reading specialist, EL teacher) provide direct and/or indirect services to students with disabilities in the general education setting. Based on the developed guidance, provide intensive professional development and follow-up coaching and modeling to give general and special educators the information and support they need to be true partners in the planning and delivery of classroom instruction. Monitor implementation through classroom walk through activities that are guided by observation protocol for this purpose.
- **Professional development.** Provide professional development for all personnel associated with the newly developed models of instruction. As part of the more generalized professional development specified in these recommendations, pair general and special educators to understand how differing perspectives impact instructional models and influence inclusivity.
- **Assess placements.** Based on the data above, at least annually review trends and how HCSD can reconfigure its human and material resources to provide students with significant manifestations of their disabilities more supportive, flexible in-district options for students.

- **General education classroom composition.** Establish a maximum student classroom ratio for students with and without disabilities for general education and monitor the ratio to ensure these configurations are not "inclusion in name only" and do not comprise a majority of students with IEPs and 504 Plan taught solely by general education teachers.

6. Out of District Placements

- **Monitor placements of students trending towards an out of district placement.** Develop a system to monitor the progress of students who are trending towards an out of district placement. The district must continue to track projections of students requiring an out of district placement to inform in district programming and address parent concerns of "outsourcing" special education for students with more significant manifestations of their disabilities.
- **Parent outreach**. Talk with parents and CSE teams who sought or required an out of district placement to better understand their motivations and limitations on offering an LRE to meet all student needs in district.
- **School assessment**. Visit or obtain other information about the most common out of district placements to ascertain how these resources are different from any currently available for any student in HCSD schools.
- **Cost analysis.** Analyze the cost of out of district placements, including costs associated with transportation and complaint/due process resolutions, and how this money can be used instead to provide these and other resources within HCSD schools or in partnership with neighboring districts. Use this information to develop the instructional models described in the above recommendations.

7. IEP Development

- **Written procedures.** Include in HCSD's written special education guidance standards and examples for IEP development processes that are appropriate and consistent across the district. Guidance would include but not be limited to Present Levels of Academic Achievement and Functional Performance (PLAAFP) and data use within; IEP goals; accommodations; and progress reporting. Include a procedure for discussing additional material and human resources than those currently available to meet a particular student's needs, including those needed for students who would otherwise be placed out of district.
- **IEP goals.** Ensure IEP goals are based on student needs identified within the PLAAFP ensuring that goals are not being created or influenced by district limitations within HCSD's current continuum of services.
- **Monitoring IEPs.** Establish and implement a process for periodically reviewing student IEPs for their consistency with expected standards. Consider using a school-based process, which would include an impartial HCSD facilitator to review, analyze and discuss IEPs with teachers and related service providers.
- **Collaboration.** Foster positive collaboration by creating more planning time between general education and special education teachers; ensuring adequate time and coverage for staff participating in CSE meetings; and transparent processes around timelines, data, and information sharing with parents to enhance trust and partnership among all CSE members. Provide interpreters for parents who are non-native English speakers and translate IEP documents.

8. Special Education Policy and Procedure Manual

- **Policy and Procedures Manual.** Develop an interactive, web based HCSD special education manual to support user-friendly and transparent access to procedures/practices relevant to the management and operations of special education and to which school staff can be held accountable for implementing. Streamline resources so that school teams can easily access relevant information and use embedded hyperlinks to provide information for staff as needed. Update the manual on a routine basis. Include criteria, procedures, and practices for each area in

the manual relevant to the implementation of these recommendations, e.g., criteria for child find; MTSS progress criteria to support the referral of students for special education evaluations; inclusive instruction; revised continuum of services; transportation protocol; etc.

9. Expanding the Role of Special Education and Student Services Staff

- **Conduct an In-Depth Analysis of Special Education and Student Services Staff.** Evaluate the current evaluation team model (diagnostic professionals and special education stipend staff) and assess the extent to which current staffing supports the intended outcomes of effective assessment and evaluation practices along with service delivery. Engage a broad group of stakeholders to develop and review them. Review personnel ratios and caseload data included in this study, reallocate, or add resources to ensure that HCSD expectations regarding the provision of special education services are met. Specifically, identify how practitioner responsibilities being led by the PPS Director can be distributed to ensure that role is focused on leadership and management expectations. Make the revised formula transparent and evaluate needed changes for the short and long term.

- **Schedule Efficiently and Monitor Caseloads of School Personnel.** Maximize the use of the personnel resources available in schools to provide behavioral and mental health supports/interventions, related services, or specially designed instruction to students with disabilities by scheduling, monitoring, and adjusting the caseloads to better utilize the existing resources with greater efficiency.

- **Cross-functional teams**. Cross-train individuals from different divisions/departments to maximize their knowledge and skills in mental health and behavioral support to leverage their collective resources to provide direct support, mentoring, coaching, and technical assistance to principals and teachers.

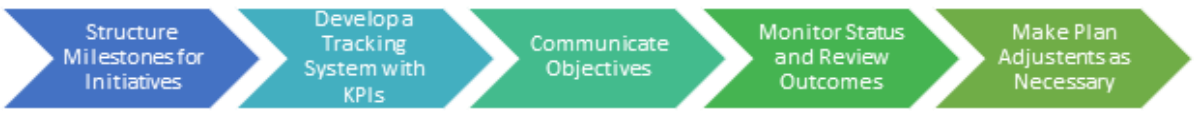
From Strategy to Execution

The secret to successful strategy execution is in translating strategies into actions. Further, tracking progress made on an organization's strategy execution is integral to understanding whether it will reach its desired future state. From our experience, the most challenging part of a comprehensive program evaluation for a school district is moving from the recommendations to a concrete action plan, then to a change in practice. These steps require significant focus, in addition to organization, communication, and collaboration across departments. Implementing change across often siloed and independent departments, with differing priorities and reporting structures, requires out of the box thinking and a commitment to approaching issues and solutions in a new light.

While there are different approaches that school districts take to managing this process, the most successful ones create a structure that is sustainable, with internal and external accountability measures and strong cross-departmental advocates. PCG recommends a five-step Strategy Execution process, which we have found results in grounded, sustainable change within an organization.

PCG recommends that HCSD address each component of our Strategy Execution Process in order to position the district to make lasting and impactful changes.

Exhibit 35. PCG's Strategy Execution Process



Structure Milestones for Initiatives

Action plans must include concrete, measurable milestones that can be assessed on a regular basis. These milestones break down initiatives into manageable steps and timelines. This structure is essential, especially given the school year cycle and the urgency by which HCSD would like to move these critical initiatives forward. At minimum, given the nature of the initiatives, progress toward milestones should be reviewed monthly through the 2023-24 and 2024-25 school years.

Develop a Tracking System with KPIs

Key Performance Indicators (KPIs) must be established for each measurable milestone. Reviewing these KPIs will help HCSD assess where each initiative stands. By monitoring these KPIs frequently, HCSD will be able to assess barriers and adjust plans early in the process if needed. It is often the case that defining metrics or KPIs is the step that allows teams to recognize challenges within the theory of action that undergirds their action plan.

Communicate the Objectives

To implement new policies and procedures, organizational changes, or new approaches, stakeholders need a solid grasp of the initiatives, the objectives, and the benefits the plan will bring to bear. Communicating progress made on each key initiative is equally important to ensuring continued support from those impacted by the changes, as well as the associated stakeholders.

Monitor Progress and Review Outcomes

Action plans are more likely to succeed when staff are deeply involved with the implementation process and there are standing monthly status checks on progress made toward established objectives. It is also critical at this point to celebrate real progress and hold individuals who have not “delivered” accountable.

Make Plan Adjustments as Necessary

An action plan is not an unchangeable document. It is a fluid plan that should be revised and updated as the HCSD environment changes and grows. Openness to revising the action plans will enable HCSD to adjust to shifting fiscal and regulatory realities as well as changing priorities. If HCSD’s core leadership team sees progress on certain initiatives falling short of expectations, a reevaluation of the original objectives and approach may be needed. However, it is also important to assess the causes of discrepancies between actual and planned results.

X. APPENDIX

PCG's Golden Thread Evidence Rubric

Indicator	Evidence
1. Results of individual evaluations provide the information the Evaluation Team needs to make its recommendations.	• Evaluation results are reported in a manner that provides sufficient basis for: present levels of performance (PLP); comparison to typically developing peers and grade-level expectations; unique learning characteristics and educational needs of the student; development of IEP annual goals and, as appropriate, short-term instructional objectives and benchmarks; and transition activities. • Evaluation results provide sufficient baseline information for future determination of progress in all areas of the suspected disability. • Evaluation reports are written in clear, precise, and easily understood language that is: jargon free, succinct, and provided in a language/mode of communication understood by the parent • Evaluation reports identify the nature and extent to which the student may need environmental modifications or accommodations; human and material resources to support learning in the general education curriculum and environment. • Evaluation reports provide instructionally relevant information that provides insight into the student's learning characteristics and needs and supports development and provision of instruction likely to result in achievement of the student's IEP goals. • The Evaluation Team reviews, discusses, analyzes, and evaluates the student's progress in order to address his/her unique needs related to the disability.
2. The IEP Team considers the interrelationship of the impact of the student's disability and present levels in the IEP.	• PLAAFPs establish a measurable baseline of student's abilities and needs for determining progress. • Parent input is solicited and included in the development of the IEP. Clear, concise PLAAFP statements are written in user friendly language, and are a thorough description of student strengths and needs.
3. Annual goals are identified to enable the student to progress in the general education curriculum and meet other disability related needs.	• Annual goals focus on the knowledge, skills, behaviors and strategies to address the student's needs. • Goals are developed in consideration of the student's need to progress toward the State standards by identifying the foundation knowledge (e.g., reading/math) necessary to meet the standards and/or the learning strategies that will help him or her to learn the curriculum content. • Targeted learning outcomes/goals are closely aligned to the general education curriculum and aligned with the age/developmental level of the class or grade level. • Annual goals define the path from the student's present level of performance to a level of performance expected by the end of the year. • IEP goals and objectives are: instructionally relevant; measurable, aligned with identified targeted needs; reasonably achieved in the period covered by the IEP; congruent with the student's ability/disability; and designed to support participation and success in the general education curriculum.
4. The IEP Team determines how student needs will be met in the	• The IEP Team uses knowledge of the continuum of appropriate academic and behavior intervention strategies for subject areas and age/developmental levels.

least restrictive environment.	• The IEP includes support for school personnel (professional development or technical assistance) as needed to implement the IEP. • The IEP Team considers issues of access, participation and progress in relation to each individual student's needs, including, but not limited to, consideration of curriculum content; modifications to instructional materials; rate of learning; physical environments; demonstration of learning; instructional approaches; instructional supports; and behavioral supports. • Recommended special education program and services, accommodations, and modifications needed for student to achieve goals are discussed. • The IEP Team actively considers and recommends accommodations or modifications to instruction and/or the use of assistive technology as necessary to ensure access to the general education curriculum. • A student's performance on classroom, state, and/or and district-wide assessments is discussed, considered and documented. • Placement is the last recommendation made in consideration of the least restrictive environment in which the student's IEP can be implemented.

Staffing Ratios

Special Educators, Paraprofessionals, Speech/Language Pathologists, and Psychologists

Ratios for Special Educator, Paraeducator, Speech/Lang, and Psychologist	State	Total Enrollment	Incidence		Special Educator			Paraeducator			Speech/Lang			Psychologist	
						Ratio To:			Ratio To:			Ratio To:			Ratio To:
			% SpEd	SpEd Enr	Number	Sped	All	Number	Sped	All	Number	Sped	All	Number	Sped
Agawam Public Schools	MA	4,347	15.1%	656	39	16.8	111.5	100	6.6	43.5	15	43.7	289.8	3	218.7
Albuquerque PS	NM	82,049	20.4%	16,738	1217	13.8	67.4	1290	13.0	63.6	161.5	103.6	508.0	98	171.5
Alexandria City Public Schools	VA	15,105	12.6%	1,896	189	10.0	79.9	151	12.6	100.0	28	67.7	539.5	20	96.2
Anchorage School Dist	AK	41,375	15.8%	6,522	794.32	8.2	52.1	706.66	9.2	58.6	65	100.3	636.5	44.7	145.9
Arlington ISD	TX	56,840	8.4%	4,799	422	11.4	134.7	455	10.5	124.9	72	66.7	789.4	21	228.5
Arlington Pub Sch	VA	29,653	12.9%	3,811	415.7	9.2	71.3	270	14.1	109.8	36.6	104.1	810.2	37.9	100.6
Atlanta Public Schools	GA	49,858	9.9%	4,950	431	11.5	115.7	224	22.1	222.6	65	76.2	767.0	22	225.0
Austin Pub S D	TX	84,676	9.5%	8,062	772.5	10.4	109.6	824	9.8	102.8	70.5	114.4	1201.1	34.6	233.0
Baltimore City Publ Sch	MD	82,824	15.5%	12,866	1,121	11.5	73.9	620	20.8	133.6	92	139.8	900.3	NA	NA
Baltimore County P Sch	MD	111,084	15.1%	16,761	1245.8	13.5	89.2	665.5	25.2	166.9	154.7	108.3	718.1	85.3	196.5
Bellevue SD	WA	19,886	9.8%	1,947	82.7	23.5	240.5	118.6	16.4	167.7	17.4	111.9	1142.9	17.3	112.5
Boston Public Schools	MA	54,966	20.6%	11,350	1242.3	9.1	44.2	800	14.2	68.7	147	77.2	373.9	76.8	147.8
Bridgeport	CT	19,330	17.8%	3,449	204	16.9	94.8	254	13.6	76.1	25	138.0	773.2	33	104.5
Buffalo Public Schools	NY	46,583	16.6%	7,744	696	11.1	66.9	365	21.2	127.6	105	73.8	443.6	62	124.9
Cambridge Publ Schools	MA	6,818	17.6%	1,200	240.03	5.0	28.4	142.5	8.4	47.8	20	60.0	340.9	22	54.5
Carpentersville	IL	20,985	15.0%	3,139	220	14.3	95.4	380	8.3	55.2	43	73.0	488.0	28	112.1
Chicago Public Schools	IL	340,658	14.6%	49,736	4,329	11.5	78.7	4,949	10.1	68.8	390	127.5	873.5	258	192.8
Cincinnati Pub Schools	OH	51,431	17.4%	8,928	457	19.5	112.5	801	11.1	64.2	62	144.0	829.5	57.7	154.7
Clark Cty School Dist	NV	322,901	12.6%	40,777	2,221	18.4	145.4	1,346	30.3	239.9	299	136.4	1079.9	180	226.5
Cleve Hts-UnivHtsCty	OH	4,874	18.5%	900	83	10.8	58.7	58	15.5	84.0	7	128.6	696.3	8	112.5
Cleveland PS	OH	39,018	21.4%	8,350	855	9.8	45.6	486	17.2	80.3	81	103.1	481.7	82	101.8
Columbus City	OH	53,740	18.1%	9,727	650	15.0	82.7	990	9.8	54.3	64	152.0	839.7	78	124.7
Compton Unified SD	CA	26,000	11.5%	2,981	126	23.7	206.3	118	25.3	220.3	5	596.2	5200.0	14	212.9
D.C. Public Schools	D.C	51,036	15.0%	7,655	669	11.4	76.3	653	11.7	78.2	90	85.1	567.1	78	98.1
Dallas PS	TX	148,021	9.1%	13,470	1078	12.5	137.3	868.5	15.5	170.4	81	166.3	1827.4	37	364.1
Davenport Comm Sch	IA	15,234	12.2%	1,857	221	8.4	68.9	344	5.4	44.3	NA	NA	NA	NA	NA
Deer Valley Unified SD	AZ	31,944	10.3%	3,289	299	11.0	106.8	312	10.5	102.4	50	65.8	638.9	34	96.7
DeKalb 428	IL	6,285	14.0%	879	58	15.2	108.4	205	4.3	30.7	9	97.7	698.3	7.5	117.2
Denver Public Schools	CO	72,737	12.6%	9,142	592	15.4	122.9	528	17.3	137.8	94	97.3	773.8	98	93.3
DesMoines Public Schls	IA	31,621	14.8%	4,680	479	9.8	66.0	600.1	7.8	52.7	118.4	39.5	267.1	11.5	407.0
Detroit	MI	54,229	16.1%	8,731	535.8	16.3	101.2	458	19.1	118.4	98	89.1	553.4	40	218.3
Elgin U-46	IL	37,403	14.2%	5,304	252.8	21.0	148.0	544	9.8	68.8	71.9	73.8	520.2	20	265.2
ESD 112	WA	13,764	14.4%	1,987	55	36.1	250.3	158	12.6	87.1	20	99.4	688.2	12	165.6
Everett Pub Schools	WA	20,102	14.1%	2,840	356	8.0	56.5	51	55.7	394.2	4	710.0	5025.5	5	568.0
Fort Worth	TX	79,421	8.4%	6,651	520	12.8	152.7	450	14.8	176.5	73	91.1	1088.0	31	214.5
Frederick County PS	MD	46,899	11.1%	5,217	428	12.2	109.6	712	7.3	65.9	99	52.7	473.7	54	96.6
Fresno PS	CA	73,848	11.2%	8,271	509.6	16.2	144.9	603.1	13.7	122.4	75.5	109.5	978.1	65.7	125.9
Garland ISD	TX	53,930	10.0%	5,393	371	14.5	145.4	338	16.0	159.6	57	94.6	946.1	9	599.2
Greenville County	SC	73,291	13.5%	9,894	463	21.4	158.3	376	26.3	194.9	93	106.4	788.1	25	395.8
Guilford County	SC	78,609	12.8%	10,062	575	17.5	136.7	448	22.5	175.5	127.7	78.8	615.6	52.33	192.3
Haldane Central	**NY**	**777**	**12.0%**	**93**	**10**	**9.3**	**77.7**	**8.7**	**10.7**	**89.3**	**2**	**46.5**	**388.5**	**1.6**	**58.1**
Houston Indepen SD	TX	196,550	8.6%	16,923	1,625	10.4	121.0	1,145	14.8	171.7	158	107.1	1244.0	21.01	805.5
Jacksonville County	FL	24,247	11.3%	2,740	193	14.2	125.6	89	30.8	272.4	25	109.6	969.9	110	24.9
Kalamazoo Pub Schools	MI	13,000	12.8%	1,667	70	23.8	185.7	79	21.1	164.6	15	111.1	866.7	NA	NA
Kent Pub Schools	WA	26,418	11.4%	3,017	148.7	20.3	177.7	318	9.5	83.1	32.3	93.4	817.9	34.5	87.4
Kyrene School District	AZ	16,342	10.3%	1,686	141	12.0	115.9	124	13.6	131.8	27	62.4	605.3	14	120.4
Lake Washington	WA	31,964	9.5%	3,021	161	18.8	198.5	241.5	12.5	132.4	32.6	92.7	980.5	26.2	115.3
Lakota Local	OH	16,800	13.7%	2,300	126	18.3	133.3	120	19.2	140.0	39	59.0	430.8	18	127.8
LAUSD	CA	464,731	13.7%	63,826	5,331	12.0	87.2	6,466	9.9	71.9	496	128.6	936.1	514	124.3
Lincoln	NE	1,060	18.9%	200	21	9.5	50.5	60.7	3.3	17.5	5	40.0	212.0	2	100.0
Madison Pub Schls	WI	25,952	14.7%	3,808	415.6	9.2	62.4	448	8.5	57.9	76.2	50.0	340.6	42.5	89.6

Marlborough Pub Sch	NJ	4,532	11.8%	536	141	3.8	32.1	115	4.7	39.4	7	76.6	647.4	4	134.0
Miami-Dade	FL	334,000	12.0%	40,012	2,500	16.0	133.6	1,226	32.6	272.4	209	191.4	1598.1	206	194.2
Milwaukee	WI	71,325	23.0%	16,406	1281	12.8	55.7	988	16.6	72.2	169	97.1	422.0	136	120.6
Montgomery County Schools	MD	160,564	14.2%	22,851	2,086	11.0	77.0	1,751	13.1	91.7	293	78.0	548.0	136.3	167.7
N. Chicago (in Dist.)	IL	3,319	12.0%	399	39	10.2	85.1	27	14.8	122.9	8	49.9	414.9	5	79.8
Naperville 203	IL	16,995	12.1%	2,064	150	13.8	113.3	237	8.7	71.7	33	62.5	515.0	22	93.8
Nashville City	TN	82,447	12.3%	10,141	680.5	14.9	121.2	594	17.1	138.8	109	93.0	756.4	65.5	154.8
New Bedford	MA	12,880	20.6%	2,655	204	13.0	63.1	205	13.0	62.8	26	102.1	495.4	9	295.0
New Rochelle	NY	9,952	15.0%	1,490	156	9.6	63.8	44	33.9	226.2	22	67.7	452.4	31	48.1
Norfolk	VA	32,066	13.5%	4329	381	11.4	84.2	304	14.2	105.5	35	123.7	916.2	23	188.2
Northern Valley RHSD	NJ	2,249	22.3%	502	28	17.9	80.3	30	16.7	75.0	1	502.0	2249.0	3	167.3
Oak Park Sch Dist 97	IL	6,042	13.0%	786	78	10.1	77.5	90	8.7	67.1	14	56.1	431.6	8	98.3
Oakland Unified SD	CA	35,565	15.1%	5,369	392	13.7	90.7	175	30.7	203.2	47	114.2	756.7	43.5	123.4
Omaha City	NE	53,191	17.2%	9,149	485	18.9	109.7	470.5	19.4	113.1	85	107.6	625.8	33	277.2
Orange County	FL	219,684	11.1%	24,385	NA	NA	NA	1165	20.9	188.6	202	120.7	1087.5	99.5	245.1
Pinellas County	FL	113,084	13.0%	14,701	881	16.7	128.4	774	19.0	146.1	150	98.0	753.9	79	186.1
Pittsburgh Pub Schools	PA	21,638	23.6%	5,096	359	14.2	60.3	554	9.2	39.1	40	127.4	541.0	138	36.9
Portland Public Schools	OR	46,937	15.4%	7,229	355	20.4	132.2	535	13.5	87.7	92	78.6	510.2	56	129.1
Prince William County Schools	VA	89,076	12.7%	11,304	774	14.6	115.1	362	31.2	246.1	67	168.7	1329.5	57.6	196.3
Providence	RI	21,694	20.6%	4,460	340	13.1	63.8	479.1	9.3	45.3	40	111.5	542.4	28	159.3
Renton	WA	15,707	13.4%	2,108	170.1	12.4	92.3	294	7.2	53.4	20	105.4	785.4	18.4	114.6
Rochester City	NY	27,360	20.0%	5,472	559.2	9.8	48.9	428	12.8	63.9	148	37.0	184.9	64	85.5
Rockford Pub S	IL	28,194	14.0%	3,948	336	11.8	83.9	334	11.8	84.4	49	80.6	575.4	24	164.5
Round Rock	TX	48,421	9.1%	4,407	369	11.9	131.2	171	25.8	283.2	41	107.5	1181.0	29	152.0
Sacramento City	CA	46,899	13.9%	6,519	288.1	22.6	162.8	246.2	26.5	190.5	33	197.5	1421.2	50.8	128.3
San Diego Unified SD	CA	103,024	14.4%	14,787	1,100	13.4	93.7	1,300	11.4	79.2	196	75.4	525.6	129	114.6
Saugus	MA	3,012	15.3%	462	32.44	14.2	92.8	74	6.2	40.7	6	77.0	502.0	2	231.0
Sch Dist of Philadelphia	PA	119,492	28.2%	33,686	1,564	21.5	76.4	2585	13.0	46.2	99	340.3	1207.0	149	226.1
Scottsdale	AZ	22,233	13.0%	2,891	349.77	8.3	63.6	230	12.6	96.7	39.4	73.4	564.3	28.4	101.8
Seattle	WA	58,248	12.5%	7,281	548.8	13.3	106.1	823.3	8.8	70.7	82.2	88.6	708.6	60.2	120.9
Shelby County (Was Memphis City)	TN	109,319	15.2%	16,637	942	17.7	116.0	655	25.4	166.9	53	313.9	2062.6	58	286.8
South Hunterton Regional SD	NJ	872	18.3%	160	31.3	5.1	27.9	25	6.4	34.9	3	53.3	290.7	1.5	106.7
St. Paul	MN	36,004	16.0%	5,761	481.2	12.0	74.8	536	10.7	67.2	97	59.4	371.2	19	303.2
Stockton	CA	39,607	11.2%	4,436	258	17.2	153.5	344	12.9	115.1	47	94.4	842.7	36	123.2
Sun Prairie Area S Dist	WI	7,655	9.1%	697	62	11.2	123.5	93	7.5	82.3	14	49.8	546.8	7	99.6
Tacoma Pub Schl	WA	28,374	13.7%	3,894	186.1	20.9	152.5	213	18.3	133.2	33.6	115.9	844.5	33.6	115.9
Tucson Unified SD	AZ	44,709	18.1%	8,092	409	19.8	109.3	419	19.3	106.7	61	132.7	732.9	54	149.9
Washoe County Dist	NV	61,599	14.3%	8,809	472	18.7	130.5	325	27.1	189.5	77	114.4	800.0	48	183.5
West Aurora SD	IL	12,316	13.7%	1,688	120	14.1	102.6	101	16.7	121.9	21	80.4	586.5	13	129.8
Williamson Cty Schl	TN	40,683	6.9%	2,824	213	13.3	191.0	400	7.1	101.7	34	83.1	1196.6	23	122.8
Worcester	MA	23,986	5.3%	1,260	254	5.0	94.4	366	3.4	65.5	38	33.2	631.2	NA	NA
Averages			**14.2%**			**14.0**	**104.9**		**15.3**	**115.2**		**115.9**	**847.5**		**173.0**

Social Worker, Nurses, Occupational Therapists, and Physical Therapists

Ratios for Social Workers, Nurses, OTs & PTs	State	Total Student Enrollment	Total Special Ed	Social Worker			Nursing (School/RN, etc.)			Occupational Therapy		Physical Therapy	
				Number	Ratio To:		Number	Ratio To:		Number	Ratio	Number	Ratio
					SpEd	All		SpEd	All		SpEd		SpEd
Agawam Public Schools	MA	4,347	656	NA	NA	NA	8.0	82.0	543.4	3.0	218.7	3.0	218.7
Albuquerque PS	NM	82,049	16,738	23.00	727.7	3,567.3	19.5	858.4	4,207.6	4.5	3,719.6	2.0	8,369.0
Arlington ISD	TX	56,840	4,799	2.00	2,399.5	28,420.0	2.0	2,399.5	28,420.0	1.0	4,799.0	NA	NA
Arlington ISD	TX	56,840	4,799	16.00	299.9	3,552.5	80.0	60.0	710.5	9.0	533.2	4.0	1,199.8
Arlington Pub Sch	VA	29,653	3,811	NA	NA	NA	112.8	33.8	262.9	21.9	174.0	7.8	488.6
Atlanta Public Schools	GA	49,858	4,950	21.00	235.7	2,374.2	68.0	72.8	733.2	19.0	260.5	13.0	380.8
Baltimore City Publ Sch	MD	82,824	12,866	32.30	398.3	2,564.2	NA	NA	NA	24.4	527.3	5.8	2,218.3
Baltimore County P Sch	MD	111,084	16,761	193.00	86.8	575.6	78.0	214.9	1,424.2	20.0	838.1	5.0	3,352.2
Bellevue SD	WA	19,886	1,947	48.70	40.0	408.3	222.3	8.8	89.5	65.2	29.9	27.0	72.1
Boston Public Schools	MA	54,966	11,350	95.00	119.5	578.6	153.0	74.2	359.3	69.8	162.6	19.5	582.1
Bridgeport	CT	19,330	3,449	6.80	507.2	2,842.6	100.0	34.5	193.3	67.0	51.5	17.0	202.9
Buffalo Public Schools	NY	46,583	7,744	38.00	203.8	1,225.9	28.0	276.6	1,663.7	7.0	1,106.3	2.0	3,872.0
Cambridge Publ Schools	MA	6,818	1,200	75.43	15.9	90.4	NA	NA	NA	75.0	16.0	29.0	41.4
Carpentersville	IL	20,985	3,139	16.00	196.2	1,311.6	NA	NA	NA	16.0	196.2	7.0	448.4
Chicago Public Schools	IL	340,658	49,736	36.50	1,362.6	9,333.1	27.5	1,808.6	12,387.6	22.0	2,260.7	6.0	8,289.3
Cincinnati Pub Schools	OH	51,431	8,928	355.70	25.1	144.6	580.0	15.4	88.7	156.0	57.2	42.0	212.6
Clark Cty School Dist	NV	322,901	40,777	NA	NA	NA	NA	NA	NA	19.0	2,146.2	5.0	8,155.4
Cleve Hts-UnivHtsCty	OH	4,874	900	NA	NA	NA	173.0	5.2	28.2	68.0	13.2	29.0	31.0
Cleveland PS	OH	39,018	8,350	7.00	1,192.9	5,574.0	5.0	1,670.0	7,803.6	2.0	4,175.0	1.0	8,350.0
Columbus City	OH	53,740	9,727	NA	NA	NA	69.0	141.0	778.8	36.0	270.2	9.0	1,080.8
Compton Unified SD	CA	26,000	2,981	36.00	82.8	722.2	103.0	28.9	252.4	43.0	69.3	24.0	124.2
D.C. Public Schools	D.C	51,036	7,655	1.00	7,655.0	51,036.0	1.0	7,655.0	51,036.0	1.5	5,103.3	0.5	15,310.0
Dallas PS	TX	148,021	13,470	7.00	1,924.3	21,145.9	NA	NA	NA	14.5	929.0	4.0	3,367.5
Davenport Comm Sch	IA	15,234	1,857	8.00	232.1	1,904.3	7.0	265.3	2,176.3	3.4	546.2	1.3	1,428.5
Deer Valley Unified SD	AZ	31,944	3,289	25.80	127.5	1,238.1	61.0	53.9	523.7	7.0	469.9	4.8	685.2
DeKalb 428	IL	6,285	879	90.00	9.8	69.8	127.0	6.9	49.5	48.0	18.3	16.0	54.9
Denver Public Schools	CO	72,737	9,142	5.00	1,828.4	14,547.4	21.0	435.3	3,463.7	NA	NA	NA	NA
DesMoines Public Schls	IA	31,621	4,680	NA	NA	NA	48.0	97.5	658.8	21.3	219.7	4.0	1,170.0
Detroit	MI	54,229	8,731	74.00	118.0	732.8	77.0	113.4	704.3	25.0	349.2	12.0	727.6
Elgin U-46	IL	37,403	5,304	76.00	69.8	492.1	38.0	139.6	984.3	31.6	167.8	10.0	530.4
ESD 112	WA	13,764	1,987	NA	NA	NA	5.0	397.4	2,752.8	6.0	331.2	3.0	662.3
Everett Pub Schools	WA	20,102	2,840	56.00	50.7	359.0	59.5	47.7	337.8	25.2	112.7	4.0	710.0
Fort Worth	TX	79,421	6,651	2.00	3,325.5	39,710.5	11.0	604.6	7,220.1	2.0	3,325.5	3.0	2,217.0
Frederick County PS	MD	46,899	5,217	NA	NA	NA	106.0	49.2	442.4	16.0	326.1	10.0	521.7
Frederick County PS	MD	73,848	8,271	2.00	4,135.5	36,924.0	NA	NA	NA	NA	NA	NA	NA
Garland ISD	TX	53,930	5,393	33.50	161.0	1,609.9	53.1	101.6	1,015.6	3.0	1,797.7	NA	NA
Greenville County	SC	73,291	9,894	NA	NA	NA	89.0	111.2	823.5	12.0	824.5	5.0	1,978.8
Guilford County	SC	78,609	10,062	20.00	503.1	3,930.5	132.0	76.2	595.5	14.0	718.7	4.0	2,515.5
Haldane Central	**NY**	**777**	**93**	**2.00**	**46.5**	**388.5**	**1.8**	**53.1**	**444.0**	**1.0**	**93.0**	**2.0**	**46.5**
Houston Indepen SD	TX	196,550	16,923	12.00	1,410.3	16,379.2	265.9	63.7	739.3	17.0	995.5	8.0	2,115.4

Jacksonville County	FL	24,247	2,740	25.00	109.6	969.9	NA	NA	NA	6.0	456.7	3.0	913.3
Kalamazoo Pub Schools	MI	13,000	1,667	5.00	333.4	2,600.0	2.0	833.5	6,500.0	4.0	416.8	3.0	555.7
Kent Pub Schools	WA	26,418	3,017	5.00	603.4	5,283.6	24.1	125.2	1,096.2	33.2	90.9	4.8	628.5
Kyrene School District	AZ	16,342	1,686	NA	NA	NA	4.0	421.5	4,085.5	23.5	71.7	4.7	358.7
Lake Washington	WA	31,964	3,021	NA	NA	NA	23.6	128.0	1,354.4	19.3	156.5	3.3	915.5
Lakota Local	OH	16,800	2,300	6.00	383.3	2,800.0	14.0	164.3	1,200.0	8.0	287.5	2.0	1,150.0
LAUSD	CA	464,731	63,826	93.99	679.1	4,944.5	164.4	388.2	2,826.7	250.2	255.1	44.5	1,433.0
Lincoln	NE	1,060	200	5.00	40.0	212.0	2.0	100.0	530.0	2.0	100.0	1.0	200.0
Madison Pub Schls	WI	25,952	3,808	51.90	73.4	500.0	32.8	116.1	791.2	34.0	112.0	13.0	292.9
Marlborough Pub Sch	NJ	4,532	536	9.00	59.6	503.6	10.0	53.6	453.2	4.0	134.0	2.0	268.0
Miami-Dade	FL	334,000	40,012	73.00	548.1	4,575.3	68.0	588.4	4,911.8	11.0	3,637.5	9.0	4,445.8
Milwaukee	WI	71,325	16,406	NA	NA	NA	206.0	79.6	346.2	65.0	252.4	23.0	713.3
Montgomery County Schools	MD	160,564	22,851	NA	NA	NA	22.0	1,038.7	7,298.4	112.0	204.0	61.0	374.6
N. Chicago (in Dist.)	IL	3,319	399	140.00	2.9	23.7	101.0	4.0	32.9	30.0	13.3	13.0	30.7
Naperville 203	IL	16,995	2,064	27.00	76.4	629.4	29.0	71.2	586.0	4.0	516.0	3.0	688.0
Nashville City	TN	82,447	10,141	NA	NA	NA	57.0	177.9	1,446.4	29.5	343.8	6.0	1,690.2
New Bedford	MA	12,880	2,655	67.00	39.6	192.2	30.0	88.5	429.3	11.0	241.4	3.0	885.0
New Rochelle	NY	9,952	1,490	27.00	55.2	368.6	36.0	41.4	276.4	9.0	165.6	4.0	372.5
Norfolk	VA	32,066	4,329	3.70	1,170.0	8,666.5	3.0	1,443.0	10,688.7	NA	NA	NA	NA
Northern Valley RHSD	NJ	2,249	502	10.00	50.2	224.9	NA	NA	NA	3.6	139.4	1.6	313.8
Oak Park Sch Dist 97	IL	6,042	786	12.00	65.5	503.5	8.0	98.3	755.3	7.0	112.3	1.0	786.0
Oakland Unified SD	CA	35,565	5,369	23.00	233.4	1,546.3	50.0	107.4	711.3	4.0	1,342.3	6.0	894.8
Omaha City	NE	53,191	9,149	19.00	481.5	2,799.5	30.8	297.0	1,727.0	12.0	762.4	2.0	4,574.5
Orange County	FL	219,684	24,385	56.00	435.4	3,922.9	74.0	329.5	2,968.7	NA	NA	NA	NA
Pinellas County	FL	113,084	14,701	67.00	219.4	1,687.8	108.0	136.1	1,047.1	10.5	1,400.1	7.0	2,100.1
Pittsburgh Pub Schools	PA	21,638	5,096	108.00	47.2	200.4	128.0	39.8	169.0	56.0	91.0	23.0	221.6
Portland Public Schools	OR	46,937	7,229	19.00	380.5	2,470.4	62.0	116.6	757.0	12.0	602.4	2.0	3,614.5
Prince William County Schools	VA	89,076	11,304	10.00	1,130.4	8,907.6	NA	NA	NA	20.0	565.2	9.0	1,256.0
Providence	RI	21,694	4,460	67.60	66.0	320.9	98.0	45.5	221.4	22.0	202.7	9.0	495.6
Renton	WA	15,707	2,108	35.00	60.2	448.8	NA	NA	NA	11.5	183.3	4.5	468.4
Rochester City	NY	27,360	5,472	NA	NA	NA	17.0	321.9	1,609.4	16.1	339.9	6.0	912.0
Rockford Pub S	IL	28,194	3,948	89.00	44.4	316.8	55.5	71.1	508.0	29.2	135.2	11.0	358.9
Round Rock	TX	48,421	4,407	26.00	169.5	1,862.3	32.0	137.7	1,513.2	12.5	352.6	4.5	979.3
Sacramento City	CA	46,899	6,519	NA	NA	NA	1.0	6,519.0	46,899.0	10.0	651.9	3.0	2,173.0
San Diego Unified SD	CA	103,024	14,787	8.00	1,848.4	12,878.0	5.0	2,957.4	20,604.8	2.0	7,393.5	NA	NA
Saugus	MA	3,012	462	NA	NA	NA	129.0	3.6	23.3	40.0	11.6	10.0	46.2
Sch Dist of Philadelphia	PA	119,492	33,686	4.00	8,421.5	29,873.0	13.0	2,591.2	9,191.7	2.0	16,843.0	1.0	33,686.0
Scottsdale	AZ	22,233	2,891	NA	NA	NA	347.0	8.3	64.1	20.0	144.6	20.0	144.6
Seattle	WA	58,248	7,281	NA	NA	NA	31.0	234.9	1,879.0	13.8	527.6	3.8	1,916.1
Shelby County (Was Memphis City)	TN	109,319	16,637	NA	NA	NA	NA	NA	NA	44.0	378.1	11.0	1,512.5
South Hunterdon Regional SD	NJ	872	160	NA	NA	NA	3.0	53.3	290.7	NA	NA	NA	NA
St. Paul	MN	36,004	5,761	89.00	64.7	404.5	33.0	174.6	1,091.0	36.0	160.0	12.0	480.1
Stockton	CA	39,607	4,436	3.00	1,478.7	13,202.3	22.3	198.9	1,776.1	3.0	1,478.7	1.6	2,772.5
Sun Prairie Area S Dist	WI	7,655	697	8.00	87.1	956.9	1.0	697.0	7,655.0	5.0	139.4	2.0	348.5
Tacoma Pub Schl	WA	28,374	3,894	NA	NA	NA	1.2	3,245.0	23,645.0	18.2	214.0	9.9	393.3
Tucson Unified SD	AZ	44,709	8,092	26.00	311.2	1,719.6	53.0	152.7	843.6	10.0	809.2	4.0	2,023.0
Washoe County Dist	NV	61,599	8,809	46.30	190.3	1,330.4	35.0	251.7	1,760.0	12.0	734.1	7.0	1,258.4
West Aurora SD	IL	12,316	1,688	NA	NA	NA	37.0	45.6	332.9	22.0	76.7	5.0	337.6
Williamson Cty Schl	TN	40,683	2,824	19.00	148.6	2,141.2	7.0	403.4	5,811.9	11.0	256.7	7.0	403.4
Worcester	MA	23,986	1,260	NA	NA	NA	97.0	13.0	247.3	12.0	105.0	5.0	252.0
Averages					**751.5**	**5,662.7**		**546.5**	**3,960.4**		**959.5**		**1,980.1**

Overall Ranking by Position

Percentage of Students with IEPs of Total Enrollment & Students with IEPs to Staff Ratio in Ascending Order

District No.	% IEPs	Special Educators	Paraeducators	Speech/Lang Pathologists	Psychologists	Social Workers	Nurses	Occupational Therapists
1	5.3%	3.8	3.3	33.2	24.9	0.6	0.3	1.3
2	6.9%	5.0	3.4	37.0	36.9	3.6	1.6	3.7
3	8.4%	5.0	4.3	39.5	48.1	4.4	3.5	16.7
4	8.4%	5.1	4.7	40.0	54.5	11.9	5.0	17.7
5	8.6%	8.0	5.4	43.7	**58.1**	17.8	8.7	18.2
6	9.1%	8.2	6.2	**46.5**	79.8	19.1	9.3	22.8
7	9.1%	8.3	6.4	49.8	85.5	20.0	11.4	27.2
8	9.1%	8.4	6.6	49.9	87.4	22.2	12.4	31.7
9	9.5%	9.1	7.1	50.0	89.6	27.2	14.4	31.7
10	9.5%	9.2	7.2	52.7	93.3	42.4	16.7	32.3
11	9.8%	9.2	7.3	53.3	93.8	44.5	19.1	32.8
12	9.9%	**9.3**	7.5	56.1	96.2	**46.5**	19.2	35.2
13	10.0%	9.5	7.8	59.0	96.6	46.5	25.3	37.0
14	10.3%	9.6	8.3	59.4	96.7	47.4	27.6	42.5
15	10.3%	9.8	8.4	60.0	98.1	49.1	34.6	49.1
16	11.1%	9.8	8.5	62.4	98.3	53.9	36.0	50.8
17	11.1%	9.8	8.7	62.5	99.6	55.2	41.1	53.4
18	11.2%	10.0	8.7	65.8	100.0	61.1	41.4	60.7
19	11.2%	10.1	8.8	66.7	100.6	61.6	41.8	62.1
20	11.3%	10.2	9.2	67.7	101.8	65.6	44.4	75.8
21	11.4%	10.4	9.2	67.7	101.8	73.2	45.1	77.9
22	11.5%	10.4	9.3	73.0	104.5	81.7	46.5	**93.0**
23	11.8%	10.8	9.5	73.4	106.7	86.1	47.9	93.0
24	**12.0%**	11.0	9.8	73.8	112.1	86.6	49.2	95.8
25	12.0%	11.0	9.8	73.8	112.5	101.5	50.0	102.1
26	12.0%	11.1	9.8	75.4	112.5	110.3	50.5	105.0
27	12.1%	11.2	9.9	76.2	114.6	111.2	52.0	118.8
28	12.2%	11.4	10.1	76.6	114.6	117.9	52.2	130.9
29	12.3%	11.4	10.5	77.0	115.3	128.6	**53.0**	132.6
30	12.5%	11.4	10.5	77.2	115.9	130.0	53.3	135.3
31	12.6%	11.5	**10.7**	78.0	117.2	131.5	58.7	154.8
32	12.6%	11.5	10.7	78.6	120.4	164.3	60.0	156.1
33	12.6%	11.5	11.1	78.8	120.6	172.0	65.6	164.3
34	12.7%	11.8	11.4	80.4	120.9	191.7	70.0	165.6
35	12.8%	11.9	11.7	80.6	122.8	221.6	80.5	182.8
36	12.8%	12.0	11.8	83.1	123.2	243.4	81.1	192.4
37	12.9%	12.0	12.5	85.1	123.4	260.6	85.6	200.6
38	13.0%	12.0	12.6	88.6	124.3	260.8	86.5	225.0
39	13.0%	12.2	12.6	89.1	124.7	299.3	90.3	262.6
40	13.0%	12.4	12.6	91.1	124.9	299.9	109.3	274.8
41	13.4%	12.5	12.8	92.7	125.9	337.6	116.4	277.3
42	13.5%	12.8	12.9	93.0	127.8	355.0	117.2	283.9
43	13.5%	12.8	13.0	93.4	128.3	387.2	117.5	288.0
44	13.7%	13.0	13.0	94.4	129.1	459.5	122.4	288.9
45	13.7%	13.1	13.0	94.6	129.8	594.9	134.0	296.3
46	13.7%	13.3	13.1	97.1	134.0	604.2	140.8	301.1
47	13.7%	13.3	13.5	97.3	145.9	650.9	143.9	308.1
48	13.9%	13.4	13.6	97.7	147.8	677.2	209.9	334.9
49	14.0%	13.5	13.6	98.0	149.9	767.2	212.1	337.9
50	14.0%	13.7	13.7	99.4	152.0	846.3	226.5	405.5
51	14.1%	13.8	14.1	100.3	154.7	881.4	256.7	457.1
52	14.2%	13.8	14.2	102.1	154.8	962.5	261.3	469.9
53	14.2%	14.1	14.2	103.1	159.3	1006.2	272.2	533.2
54	14.3%	14.2	14.8	103.6	164.5	1126.8	276.4	553.1
55	14.4%	14.2	14.8	104.1	165.6	1170.0	278.1	567.4
56	14.4%	14.2	14.8	105.4	167.3	1192.9	293.6	568.0
57	14.6%	14.3	15.5	106.4	167.7	1412.0	293.6	572.6
58	14.7%	14.5	15.5	107.1	171.5	1445.8	299.8	727.6
59	14.8%	14.6	16.0	107.5	183.5	1560.0	319.3	800.8
60	15.0%	14.9	16.4	107.6	186.1	1739.7	342.5	806.2
61	15.0%	15.0	16.6	108.3	188.2	1891.7	367.0	810.6
62	15.0%	15.2	16.7	109.5	192.3	1905.3	703.8	831.9
63	15.1%	15.4	16.7	109.6	192.8	2287.3	788.0	913.3
64	15.1%	16.0	17.1	111.1	194.2	2684.5	800.2	942.0
65	15.1%	16.2	17.2	111.5	196.3	3048.1	810.7	1086.5
66	15.2%	16.3	17.3	111.9	196.5	3139.0	1014.1	1132.4
67	15.3%	16.7	18.3	114.2	212.9	4144.7	1202.0	1169.6
68	15.4%	16.8	19.0	114.4	214.5	NA	1443.0	1412.0
69	15.5%	16.9	19.1	114.4	218.3	NA	1670.0	1418.8
70	15.8%	17.2	19.2	115.9	218.7	NA	1838.0	1560.0
71	16.0%	17.5	19.3	120.7	225.0	NA	2203.5	1692.3
72	16.1%	17.7	19.4	123.7	226.1	NA	2398.6	1807.3
73	16.6%	17.9	20.8	127.4	226.5	NA	2840.0	2092.7
74	17.2%	18.3	20.9	127.5	228.5	NA	3139.0	2203.5
75	17.4%	18.4	21.1	128.6	231.0	NA	3281.2	2532.7
76	17.6%	18.7	21.2	128.6	233.0	NA	3614.5	2535.3
77	17.8%	18.8	22.1	132.7	245.1	NA	4494.2	2734.3
78	18.1%	18.9	22.5	136.4	265.2	NA	4877.0	2795.0
79	18.1%	19.5	25.2	138.0	277.2	NA	6217.0	2929.2
80	18.3%	19.8	25.3	139.8	286.8	NA	8062.0	4175.0
81	18.5%	20.3	25.4	144.0	295.0	NA	NA	4574.5
82	18.9%	20.4	25.8	152.0	303.2	NA	NA	5712.8
83	20.0%	20.9	26.3	166.3	364.1	NA	NA	7105.1
84	20.4%	21.0	26.5	168.7	395.8	NA	NA	10003.0
85	20.6%	21.4	27.1	191.4	407.0	NA	NA	12192.5
86	20.6%	21.5	30.3	197.5	568.0	NA	NA	21275.3
87	20.6%	22.6	30.7	313.9	599.2	NA	NA	NA
88	21.4%	23.5	30.8	340.3	805.5	NA	NA	NA
89	22.3%	24	31.2	502.0	NA	NA	NA	NA
90	23.0%	24	32.6	596.2	NA	NA	NA	NA
91	23.6%	36	33.9	710.0	NA	NA	NA	NA
			55.7		NA			
	28.2%	**14.0**	**15.3**	**115.9**	**173.0**	**615.7**	**723.7**	**1285.8**