

Special Education Review

Bedford Central School District

February 2025



PUBLIC
CONSULTING GROUP

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I. INTRODUCTION AND METHODOLOGY

PURPOSE OF THE STUDY

In July 2024, Bedford Central School District (BCSD) engaged with Public Consulting Group (PCG) to conduct an independent review of its special education program and services. This report describes the current state of the special education program in BCSD and is designed to guide the District toward continuous improvement.

This study examined the following guiding research questions:

Learning Environment and Specialized Services

- To what extent is the Multi-Tiered System of Supports (MTSS) employed to support students requiring academic and/or behavioral intervention?
- How is the continuum of services organized to support a Free and Appropriate Public Education (FAPE) and the Least Restrictive Environment (LRE)?
- Is there a consistent “golden thread,” or supporting body of evidence, that connects the student’s disability with present levels, learner characteristics, goals, progress, placement, and selected accommodations for instruction and assessment?

High Expectations

- How does BCSD perform on outcomes and transition for students with disabilities?

Human Capital and Leadership

- How does BCSD utilize and organize its human capital resources?
- How does BCSD support teacher pedagogy and professional learning?
- How are best practices established for professional development for general education teachers to support classified students better and promote inclusion?

Systems and Structures

- Do current staffing allocation procedures and practices allow for special education staff to adequately meet the needs of students with disabilities in BCSD?
- How does BCSD allocate resources in a way that facilitates a maximum return on district investment? How does budget management occur? How are grant funds accessed and used?

Family and Community Engagement

- To what extent are parents of children with IEPs satisfied with their child’s educational program?
- How do community relations and customer service function specific to the following areas?

METHODOLOGY

PCG conducted a mixed-methods study of the special education program in BCSD. The findings and recommendations related to programs, policies, and practices resulted from a comprehensive review of several data sources. Sources included 1) Data and Document Analysis, including an Independent IEP Review; 2) Organizational Focus Groups/Interviews; 3) Staff, Parent, and Student Surveys; 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 BCSD statistics against local, district, state, and national data. The method and sources of data were triangulated to increase the validity of the conclusions regarding program implementation, identification of gaps in services and programming, and recommendations for the continued improvement of BCSD special education programs and continuum of services.

Details of each data source are included below.

Data and Document Analysis

Population Trends, Programs, and Achievement Outcomes Analysis

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 100 documents for information related to district and school structures, programs, policies, and practices. The documents were coded for themes that aligned with the focus group and interview findings. Documents reviewed were from the following categories:

- Organizational structure, staffing, and resource allocation
- Description of academic programs, services, interventions, and activities
- Documents regarding instruction and professional learning
- District procedures and guides
- Compliance and due process complaints
- Fiscal information, including budget documents

Independent File Review

PCG conducted an independent, virtual IEP student file review. The protocol used for this review was based on PCG's Golden Thread protocol which connects the student's disability with present levels, learner characteristics, goals, progress, inclusion needs, and selected accommodations for instruction and assessment. In total, twenty-five student files were reviewed using this protocol, with random selections made to represent students across all grade levels, various placement settings, and English Language Learners (ELLs). The review focused on present levels, goals, services and placement, and student progress. Additional information about the structure of the Golden Thread protocol can be found later in the report in

Exhibit 55.

For this IEP review, we set an 80-90% confidence interval (CI) and a margin of error (MOE) less than 20% based on the District's size. This was to identify broader trends and areas for potential improvement in the quality of IEPs rather than capturing an exhaustive list of every individual IEP. The MOE for this sample is 16.1% at a 90% CI, which falls under the 20% MOE target set for this IEP sample. With this MOE, the sample of 25 IEPs allows our team to reliably detect patterns and overarching trends using our Golden Thread rubric.

Organizational Focus Groups/Interviews

To understand how special education programs operate 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 BCSD leadership to determine the best outreach and communication methods for focus groups and interview participation, confirming that selection was voluntary and unbiased. PCG provided a sample schedule and list of positions to participate in these groups to the BCSD leadership team to confirm that all stakeholders were included. Overall, PCG held focus groups with a variety of stakeholders.

Focus groups consisted of between 2 and 10 participants, while interviews were conducted one-on-one with participants. Ultimately, there was a cross-section of staff that participated in focus groups to provide a strong sampling of staff in BCSD from both the District level and building level. As part of this review,

supervisors did not participate in the same focus groups or interview sessions with those staff members they supervised to allow all staff to speak candidly and honestly.

After receiving feedback from on-site focus groups in September, PCG held a fourth virtual focus group in October, prioritizing bilingual parents. In total, four parent focus groups were conducted.

Staff, Parent, and Student Surveys

An online survey process was implemented to collect data on stakeholder perceptions of the quality and effectiveness of BCSD's special education services. PCG collaborated with BCSD to review survey items and disseminate three optional surveys: one to parents of students with IEPs, one to students in grades 8-12 being served with IEPs, and one to staff.

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 support effective programming, parent involvement, and positive results for students with disabilities in BCSD.

BCSD reviewed the survey items to verify their relevance for this scope of work. 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 and Analysis

PCG worked collaboratively with BCSD to facilitate a survey process that would result in the highest possible rate of return for three stakeholder groups. PCG kept surveys open from three to five weeks to maximize this response rate.

Surveys are a critical tool for gathering data and understanding stakeholder perspectives. To yield reliable results, it is important to achieve a representative sample that reflects the diversity and composition of the population being studied. Our team strives for a 20% response rate, which is generally considered a strong indicator of representativeness in educational settings. However, even with a 15% response rate, valuable insights can be gained, especially when survey findings are analyzed alongside recurring themes identified in focus groups and interviews. This approach supports a well-rounded understanding of stakeholder needs and experiences.

To encourage participation, all parents of students with an IEP were informed of the parent survey's purpose and provided instructions for access via ParentSquare through a targeted email listserv. Both this communication and the survey were provided in English and Spanish. A total of 116 (approximately 15.4%) parents who received the online survey completed or partially completed it, with 18 parents responding in Spanish. This is a relatively low response rate from parents; therefore, survey results should be interpreted with some caution and may not represent the experiences or perceptions of all parents in the BCSD community.

PCG also worked with BCSD to determine an opt-out process for the student survey. Parents of students with IEPs were notified of the student survey and provided a copy of the survey questions to review. PCG passed on a google form that BCSD disseminated for parents to indicate non-consent for their child to participate in the student survey. BCSD then removed students whose parents indicated non-consent from an email listserv, and links were shared to students whose parents had not opted out within a one week window. Additionally, staff were provided with information about the student survey and encouraged to set aside 15 minutes of time for their students to complete it. The student survey was provided in English and Spanish. A total of 57 (approximately 22.7%) students who received the online survey completed or partially completed it. This student response rate is much higher than what our team has

observed in most districts, however we still recommend that these survey findings be interpreted with some caution, as they may not fully represent the experiences or perceptions of all students in BCSD.

PCG partnered with BCSD to send out communication about the staff survey, which was sent out to staff through an email listserv. The survey was accessible via ParentSquare for all school-based staff. A total of 189 (approximately 23%) staff completed or partially completed the online staff survey. Survey responses from staff included the following groups:

- Special education teachers
- General education teachers
- Specials/elective teachers
- Related service providers (OT, PT, Speech, etc.)
- Student support services (Psychologist, Nurse, Counselor, BCBA, Social Worker, etc.)
- Paraprofessionals (e.g., Teaching Assistants/Teacher Aides)
- School building administrators
- Coordinators, facilitators, coaches
- Other school-based staff members

Classroom Observations

In September 2024, PCG visited eight schools in BCSD over three days, observing approximately 34 classrooms. During these visits, classes were observed from 20-30 minutes depending on the subject area and programming. To support a representative sample, PCG requested a list of classrooms that included students with IEPs, along with information on grade level, subject area, and placement designation. Classrooms were then randomly selected from this list for visits. The intent was to confirm that all placement settings were represented across all schools and grade levels.

PCG's School Observation protocol was designed to collect qualitative information about the school building and individual classrooms, it is not designed to evaluate teachers. It focused on several key areas: 1) Classroom Staffing, 2) Classroom Environment, 3) Specially Designed Instruction, and 4) Data Collection Methods. PCG observed all instructional/service delivery settings (e.g., Integrated Co-Teaching (ICT), Consultant Teacher (CT), specialized reading instruction, therapeutic support programs, resource room classes, and Special Classes) across a wide representation of grades.

The resulting data from all school visits are categorized and aggregated to inform impressions of the special education system districtwide and indicate areas in which professional learning 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, this information is used primarily as another set of data for overall triangulation.

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.¹ We follow a mixed-method collaborative program evaluation model that is systemic, based upon qualitative and quantitative research methods, and produces credible and valid data that proactively inform program implementation, determines gaps, and offer recommendations for the continued improvement of the system. We value the importance of developing trust, open communication, and fostering collaboration between the review team and program staff.

¹ Donnis-Keller, C., Meltzer, J., & Chmielewski, E. (2013, February). The Power of Collaborative Program Evaluation. https://www.publicconsultinggroup.com/media/1272/pcg_collaborative_evaluation.pdf

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.

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."*²

One purpose of the Individuals with Disabilities Education Act of 2004 (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 benefit and improve outcomes and results for students with disabilities.³ 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 the achievement gap. 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.⁴ This shift is having a great impact in guiding priorities of special education systems nationwide, including in BCSD. Districts nationwide are working to raise the level of and access to rigor in the classroom and generate a culture of academic optimism.⁵

The importance of these issues was highlighted by the U.S. Supreme Court's decision on March 22, 2017, in *Endrew F. v. Douglas County School District*.⁶ In this landmark case, the Court revised its previous standard for assessing whether a school district is providing an appropriate education for students with disabilities. The ruling emphasized the need for establishing ambitious and challenging goals that enable each student to achieve both academic and functional progress and to advance from grade to grade. For students with disabilities, including those following alternate academic achievement standards, progress must be appropriate in light of their unique circumstances. The Court also clarified that yearly progress must exceed the "merely more than de minimis" standard that some lower courts had previously applied. The ruling underscored that the IDEA requires more than minimal progress. The Endrew decision struck a balance between the lower standard used by the 10th Circuit and other courts ("more than de minimis") and the higher standard advocated by Endrew's parents, which sought to provide students with disabilities opportunities for academic success, self-sufficiency, and meaningful societal contributions similar to those available to children without disabilities. The most significant impact of the Endrew decision in the classroom is seen in: (1) the design and development of rigorous Individualized Education Programs (IEPs); (2) the faithful implementation of these IEPs; and (3) increased monitoring of progress toward IEP goals.

² *About IDEA*. Individuals with Disabilities Education Act. (n.d.). <https://sites.ed.gov/idea/about-idea/>

³ *Office of Special Education Program's Results Driven Accountability Home Page*. U.S. Department of Education. (2024). <https://www.ed.gov/about/ed-offices/osers/osep/office-of-special-education-programs-results-driven-accountability-home-page>

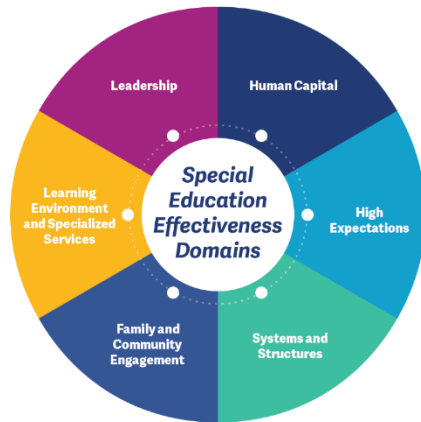
⁴ *Ibid.*

⁵ 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.waynehoy.com/school-academic-optimism/>

⁶ *Endrew F. v. Douglas County School District RE-1*, 580 U.S. (2017)

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.⁶ 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 findings and recommendations provided in this report are organized around these domains and are oriented toward extending BCSD's focus on outcomes for students with disabilities.

TERMINOLOGY

There are several terms used throughout this report that require definition and clarification within the BCSD context. Additional terminology was included from documents reviewed to be more reflective of language utilized in the District.

Committee on Special Education (CSE). The CSE is a multidisciplinary team authorized to identify students in need of services by determining eligibility, developing an Individualized Education Program (IEP), and placing the student in the least restrictive environment in which they can succeed by providing specially designed instruction (SDI) and supplementary aides and 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.

Committee on Preschool Special Education (CPSE). The CPSE is a multidisciplinary team that determines 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.

Consultant Teacher (CT) Services. Consultant Teacher services are direct or indirect services provided by a special education teacher to assist students with disabilities in general education classes. These services are intended to support students in accessing the general education curriculum and achieving their IEP goals.

District. Throughout this report, the term "District" is used interchangeably with BCSD and refers to the entire school system, including general education, special education, school and district leadership, educators, and support staff. It is not intended to refer solely to the special education department but rather to the collective responsibility of the entire district to support an effective and inclusive educational experience. This distinction is important, as many of the findings and recommendations outlined in this report require collaboration across all departments, leadership levels, and instructional teams, rather than being the sole responsibility of special education staff.

English as a New Language (ENL). Programming in New York that provides specialized instruction to support multilingual learners (MLLs)/English Language Learners (ELLs) in developing English language proficiency while accessing grade-level content. ENL instruction is delivered by certified teachers and incorporates both standalone classes focused on language acquisition and integrated co-teaching with content-area classrooms. The program emphasizes the development of speaking, listening, reading, and writing skills in English while fostering academic success and cultural inclusion.

Integrated Co-Teaching (ICT). Integrated Co-Teaching involves a general education teacher and a special education teacher working together to provide instruction to a mixed group of students with and without disabilities in a general education setting. The goal is to support students with disabilities in accessing the general education curriculum alongside their peers.

Learning Specialist. Title used in BSCD for Special Education Teachers, these titles are used interchangeably throughout the report.

Multi-Tiered Systems of Support (MTSS). MTSS is a framework for delivering evidence-based academic, behavioral, and social-emotional interventions tailored to the needs of all students. MTSS uses a proactive, data-driven approach to identify and support students through a continuum of services organized into three tiers:

1. *Tier 1 (Universal Supports):* High-quality instruction and interventions provided to all students in the general education setting.
2. *Tier 2 (Targeted Supports):* Small-group interventions for students who need additional support beyond what is provided universally.
3. *Tier 3 (Intensive Supports):* Individualized interventions for students with significant or persistent needs

New York State Education Department (NYSED): The state agency responsible for overseeing public education in New York, including the implementation of state education policies, the administration of standardized assessments, and the management of special education services.

Paraprofessional. Throughout this report, the term *paraprofessional* refers to any staff member who provides instructional or support services to students but does not hold a teaching credential. This includes both Teaching Assistants and Teacher Aides, who play a critical role in supporting student learning, assisting with classroom management, and facilitating access to educational activities under the direction of certified teachers or other school professionals.

Teaching Assistant. In BCSD Teacher Aide and Teaching Assistant roles differ, Teaching Assistants were formerly called Instructional Assistants (IAs) and must hold a Bachelor's degree for this role. This is a BCSD requirement and not a state requirement. Teaching Assistants can support in a variety of ways but often support in an instructional capacity.

Teacher Aides. Teacher Aides act in the same capacity as paraprofessionals and it is not required for them to hold a Bachelor's degree like it is for Teaching Assistants in the District. Teacher Aide and paraprofessional will be used interchangeably throughout this report.

SWD. Acronym for Students with Disabilities which is used throughout the report.

SWOD. Acronym for Students without Disabilities which is used throughout the report.

II. BACKGROUND AND KEY TAKEAWAYS

Bedford, a historic town located in Westchester County, New York has a rich legacy dating back to its founding in 1680 when it was originally part of Connecticut. In 1700, Bedford officially became a part of New York. The town is known for its rich history, country estates, scenic trails, thriving arts community, and exceptional education. Bedford's dedication to education dates back to the late 1700's with the first deed for a schoolhouse recorded in the 1790's. The town's first formal school, Bedford Academy, was established on January 19, 1807⁷

As of the 2023-2024 school year, Bedford Central School District (BCSD) serves approximately 3,500 students across 59 square miles. The District's budget for this academic year stands at \$164,544,458. ⁸According to the New York State Education Department's (NYSED) report card, the student body is composed of 51 percent male and 49 percent female students. The majority of students are White (50%), with Hispanic or Latino students comprising the second largest demographic at 41%. Multiracial, Asian, Native Hawaiian or Pacific Islander, and Black or African American students account for less than 5% of the student population.⁹

BCSD's student body is diverse in its needs and backgrounds with 18 percent of students identified as English Language Learners and 17% as students with disabilities. Additionally, 39% of all students in BCSD are classified as economically disadvantaged. Within these subgroups, 11% of males and 6% of females identified as students with disabilities. Of the students with disabilities, 9% are Hispanic or Latino, and 7% are White. The District's total K-12 enrollment stands at 3,498 students for the 2023-2024 school year.¹⁰

The District has an impressive 95% attendance rate and a minimal 2% suspension rate. The 2023 graduating class had a total of 283 students, and of those 88% were college-bound. Among those students, 85% were set to attend four-year colleges, while 15% plan to pursue a two-year college education. This data highlights BCSD's commitment to preparing its students for their futures.

BCSD is committed to building strong relationships with its surrounding communities. The District values the voices of parents and community organizations who contribute to the growth and development of students. BCSD's mission is as follows:

"We recognize each child as an individual with the potential to achieve their personal best. We are committed to guiding our students on their unique educational journeys by nurturing their abilities and encouraging a growth mindset, while challenging and supporting their academic development and fostering their social-emotional and physical well-being. We celebrate diversity, an inclusive learning environment, and respect for others as important components in developing global citizens."

BCSD's focus on creating inclusive learning environments was highlighted during the 2017-18 school year under the previous special education leadership team, with "The Inclusion Quest." The "Inclusion Quest" was a multi-year districtwide initiative between the District and stakeholders to identify foundational inclusive practices occurring and strategically prioritizing the roll-out of more expansive inclusion priorities. The creation of a District level steering committee to identify resources to support all students across the continuum of services served as core principle of the "Inclusion Quest." A focus was placed on professional development and coaching of research-based best practices, including Universal Design for Learning (UDL), Augmentative and

⁷ Bedford Historical Society. (n.d.). *Bedford's history*. <https://www.bedfordhistoricalsociety.org/bedfords-history>

⁸ Bedford Central School District. (n.d.). *District profile*. <https://www.bcsdny.org/about-bcsd/district-profile>

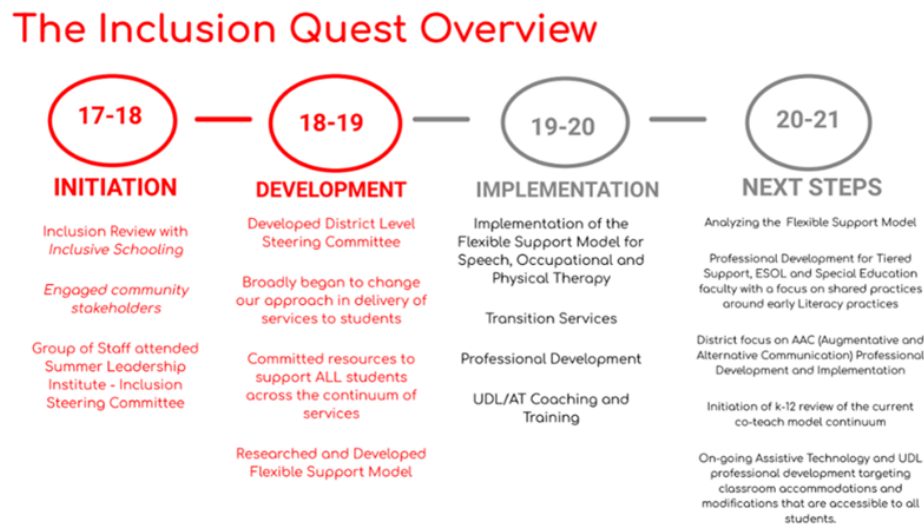
⁹ Data retrieved from: <https://data.nysed.gov/profile.php?instid=800000035721>

¹⁰ Data retrieved from: [NYSED Report Card: Bedford CSD Enrollment Data 2023-24](#)

Alternative Communication (AAC), and Assistive Technology (AT). BCSD researched and adopted the implementation of the Flexible Support Model for Speech, Occupational and Physical Therapists which is explored in greater detail throughout this report.

The District has continued to prioritize expanding inclusive practices beyond the work of “The Inclusion Quest” initiative. Inclusive practices and UDL were identified as potential foci for the 2022-2023SY Curriculum Council. District leaders have implemented a practice of including students with disabilities in self-contained placements on the roster of their corresponding grade-level general education classroom. This approach promotes access to grade-level instruction and participation in non-academic activities. The creation of the Accessibility Team has allowed for districtwide events to become more inclusive and accessible for students with disabilities and their families. BCSD, in partnership with the Special Education Parent Teacher Organization (SEPTO), has implemented the Best Buddies Club, a nationally recognized program aimed to build friendships between students with and without intellectual and developmental disabilities, at Fox Lane High School. Several events have taken place since the program’s inception including cookie decorating, art projects, and the Buddy Bowl, an inclusive districtwide event to raise awareness of the program during the Varsity football game. Additionally, the District has conducted two special education programmatic reviews within the last several years which included an analysis of inclusive practices.

EXHIBIT 1. BCSD THE INCLUSION QUEST OVERVIEW¹¹



The frequency and quality of inclusive opportunities during and outside of the school day for students with disabilities and their families in BCSD has grown considerably over the past few years. This can be attributed to the efforts of community and parent advocates along with District leaders and Board of Education members who recognize the value of meaningful inclusion. The priority for BCSD moving forward is to create a sustainable vision for inclusion and a culture that supports that vision throughout the District. Providing high-quality core instruction and specially designed instruction for students with disabilities in general education settings are two tangible outcomes of this vision. Additionally, BCSD should continue to expand and enhance opportunities for students in more restrictive settings to engage meaningfully with their non-disabled peers, building upon existing inclusive practices and providing all students with access to enriching experiences.

¹¹ BCSD “Special Education Update” Presentation, November 2019

BCSD staff, parents, Board members, and community-based advocates have a shared vested interest in the success of students with disabilities throughout the District. There is an opportunity for continuing to prioritize collaboration between general and special education staff in setting shared expectations for students with disabilities in BCSD. The recommendations within this report serve as a starting point to facilitate these collaborative conversations.

Previous Audits and Reviews

At the outset of this project, PCG was informed that BCSD had undergone several prior reviews of its special education programming. While PCG acknowledges the existence and value of these past reports, it was intentional not to incorporate findings into this analysis. This decision was made to support an objective and unbiased evaluation of the District's current special education practices, unclouded by previous findings or recommendations. PCG's commitment was to conduct a review that would authentically reflect the District's present strengths, challenges, and opportunities for growth, based on the data, insights, and stakeholder feedback gathered during this process.

By approaching this work with a fresh perspective, PCG aimed to honor the progress and efforts that have been made while focusing on actionable steps for the future. It is PCG's hope that the findings and recommendations in this report serve as a catalyst for collaboration across BCSD and its community, fostering a shared vision and direction for enhancing outcomes for students with disabilities. Through this approach, PCG seeks to contribute to building a foundation for sustainable improvements that prioritize equity, access, and success for all learners.

KEY TAKEAWAYS

A high-quality special education program is only as strong as the general education foundation it is built upon. Our review begins with this fundamental understanding: the effectiveness of special education is not the sole responsibility of the special education department or its staff. Instead, it is a shared commitment that requires alignment, collaboration, and ownership across the entire District—including general education teachers, school and District leaders, Board members, families, and the broader community.

This report is not a one-time evaluation but a step in an ongoing process of continuous improvement. The recommendations outlined here are designed to enhance BCSD's ability to meet the needs of all learners by strengthening inclusive practices, reinforcing shared responsibility, and providing every student with access to a rigorous and supportive educational experience. Implementing these shifts will require a districtwide commitment, and this report serves as a guide to that collaborative effort. Our goal is to support the District in building capacity at every level so that special education services are integrated seamlessly into a high-quality educational experience for all students. While PCG will assist in action planning, lasting change will require sustained commitment and leadership from the District to drive these efforts toward meaningful improvements for all learners.

The following key takeaways have been identified as high-level priorities for BCSD to consider as it begins action planning and developing a roadmap to drive meaningful improvement. These priorities reflect critical areas of focus that address current challenges and leverage opportunities to strengthen systems, structures, and practices. They provide a foundation for building a unified vision of support for all students, strengthening inclusive practices, and aligning resources to promote the effective and sustainable implementation of the District's initiatives. By focusing on these priorities, BCSD can set the stage for actionable steps that promote collaboration, shared ownership of student outcomes, and continuous improvement across all levels of the organization.

1) Strengthen the Collaboration Between General and Special Education Teams

Bridging the divide between general and special education teams is essential to creating shared ownership of student outcomes and embedding inclusive practices into the BCSD culture. Currently, students with disabilities are often seen as the sole responsibility of special education staff, which limits the District's ability to fully implement an effective Multi-Tiered System of Supports (MTSS) framework and prevents inclusive practices from becoming integral to educational programming. To address these challenges, BCSD should prioritize establishing clear and actionable collaborative structures that optimize teachers' time and efforts to support inclusive educational services. The District has made significant strides in integrating strong, Tier 1 intervention practices within a larger MTSS framework. This commitment is evident in the creation of structures to support MTSS implementation. However, at the elementary level an abundance of staffing structures and guidance has been created leading to overlapping streams of support. It is critical that the MTSS framework is documented to highlight the integration of staff (i.e., Tiered Support Teachers vs. RTI problem-solving team) and implementation strategies. Several study participants perceived BCSD has a shortened instructional day, which they acknowledged as a challenge for students trying to access multiple types of intervention. Currently, instructional time at BCSD schools ranges from 6 to 6.5 hours per day depending on transition times, which is slightly below the national average of 6.8 hours.¹² While this perception exists, PCG does not recommend extending the instructional day beyond the current schedule for BCSD students and staff. The critical factor to be considered is how to continue to maximize the impact of current MTSS and intervention practices within the existing structure, including co-serving.

Key actions include defining and communicating clear standards for collaborative teaching and co-planning to promote consistency and effectiveness across the District. Teachers should be provided with dedicated and protected time within their schedules to engage in co-planning, collaboration, and professional learning focused on inclusion. Joint professional development opportunities should target inclusive teaching strategies, accessible curriculum design, and co-teaching models, equipping both general and special education staff with the tools needed to meet the needs of diverse learners.

Cross-departmental teams should be formed to identify and address systemic barriers to inclusion, such as scheduling conflicts, curriculum misalignment, or resource gaps, allowing teachers to fully engage in collaboration without unnecessary obstacles. Regular evaluation of the impact of these collaborative efforts on student outcomes should guide continuous improvement, supported by data collection and analysis. Celebrating successful examples of collaboration will further reinforce a culture of shared responsibility and motivate ongoing engagement.

By implementing these strategies and establishing the necessary collaborative structures, BCSD can make inclusive practices a shared responsibility and a cornerstone of its culture. These efforts will enhance the delivery of high-quality instruction, fully integrate MTSS, and drive improved outcomes for all students, especially those with disabilities.

2) Align District Staffing, Scheduling, and Support Models to Meet Student Needs Effectively

BCSD is working to address challenges in staffing, scheduling, and support models to effectively meet the needs of students with IEPs. To support this effort, District leadership has contracted with a subject matter expert in master scheduling to guide and implement necessary changes. However, as these adjustments are still in progress, some District staff may continue to perceive scheduling and service delivery for students with disabilities as an ongoing challenge. Currently, 33% of staff survey respondents

¹² National Center for Education Statistics. (2021). *Private School Universe Survey (PSS), 2021–22*. U.S. Department of Education, Institute of Education Sciences. Retrieved from <https://nces.ed.gov/surveys/pss/tables/TABLE19f12122.asp>

believe there are enough staff to adequately support students with disabilities, a belief shared in focus groups as well, highlighting a perception of understaffing. However, the caseload analysis indicates that BCSD is meeting or below NYSED requirements for staffing for students with disabilities. Further analysis of staffing and resource allocation was conducted as part of this study. BCSD is appropriately staffed in all roles related to the provision of special education and related services. This discrepancy suggests the need for a more thorough workload analysis to better understand how staff time and resources are being allocated, identify inefficiencies, and address concerns about workload equity as it appears from a caseload analysis that BCSD has the staffing they need to support special education.

The Flexible Support Model (FSM), designed to provide adaptable student services, is another area of concern. Many staff report that the FSM is not effective, despite District efforts to provide guidance. A detailed evaluation of the FSM, including a workload analysis and time sampling during Flex Week, is necessary to determine whether it is achieving its goals or if a transition to a full minutes-based or session-based service model would be more effective. Observations and feedback from staff should guide these adjustments so the model effectively meets the needs of both students and staff.

At the writing of this report, master scheduling also poses challenges, with staff noting difficulties in balancing competing priorities such as core instruction with the new Bookworms curriculum, MTSS implementation, specially designed instruction, English as a New Language (ENL) services, and related services. These competing demands often result in inefficiencies and potentially missed services for students. A comprehensive audit of master schedules across the District, informed by stakeholder feedback, can identify systemic issues and inform improvements. Providing ongoing training and resources for school leaders and staff will be critical to implementing consistent, effective scheduling practices that prioritize equitable and timely delivery of services.

To address these interconnected challenges, BCSD should:

- **Conduct a comprehensive workload analysis** to evaluate staff responsibilities beyond caseload numbers, engaging teachers and related service providers to gather actionable insights.
- **Evaluate the effectiveness of the FSM** through time sampling and staff feedback, using findings to determine whether adjustments to the model are needed to improve outcomes for students and staff.
- **Continue to audit and refine master scheduling practices** with a subject matter expert to address systemic barriers, allowing schedules to support high-quality instruction and services for students with disabilities while effectively balancing diverse priorities.

These efforts will enable BCSD to align staffing, scheduling, and support models with student needs, allowing resources to be used effectively and equitably while promoting positive outcomes for students with disabilities.

3) Expand the Continuum of Special Education Programming

BCSD has a significant opportunity to strengthen its continuum of services by addressing gaps in inclusive programming and behavioral support at the elementary level. Currently, Integrated Co-Teaching (ICT) and specialized behavioral programs, such as the Therapeutic Support Programs (TSP), are offered exclusively at the secondary level. This absence of similar programs at the elementary level has created a gap in the Least Restrictive Environment (LRE) continuum, limiting access to collaborative and inclusive teaching as well as necessary behavioral support for younger students. Addressing these gaps is essential to providing equitable, high-quality educational opportunities for all students, including those with behavioral, social, or emotional challenges.

Our data from classroom observations, staff feedback, and survey responses indicate that, in some cases, Learning Specialists function more like Teaching Assistants within the Consultant Teacher (CT) and Integrated Co-Teaching (ICT) models due to limited opportunities for collaboration and meaningful planning with staff. Survey data further supports this concern, with only 38% of staff agreeing that BCSD has established standards for delivering co-teaching and collaborative instruction, and just 34% agreeing that general and special education teachers have collaborative planning time to prepare for effective instruction for students with IEPs. This initiative could help create the conditions for Learning Specialists to fully leverage their expertise in delivering targeted, inclusive instruction alongside general education teachers.

The District should begin by conducting a comprehensive needs assessment to identify the schools and grade levels most suited for piloting the ICT model. Following this, a detailed pilot plan should be developed, outlining clear timelines, goals, and criteria for selecting classrooms. Professional development for teachers must focus on co-teaching strategies, collaborative planning, and inclusive instructional practices. To support success, dedicated collaboration and planning time for co-teachers must be established, and implementation should be monitored closely. Data on student progress and teacher feedback should be collected to evaluate the ICT pilot's impact and refine the approach before scaling ICT to additional elementary schools.

In addition to ICT, the District should address the absence of specialized behavioral programming at the elementary level. Developing programs similar to the secondary-level TSP would provide essential supports for students with behavioral, social, and emotional needs. This effort should include establishing tiered intervention systems or other specialized supports tailored to the elementary setting. Staff training in evidence-based behavioral strategies is crucial, along with maintaining sufficient staffing levels and providing highly trained personnel to support these programs effectively. An evaluation of current staffing capacity and resource allocation will be necessary to determine how best to meet the needs of this student population.

By expanding ICT and behavioral programming to the elementary level, BCSD can build a more cohesive and comprehensive continuum of services. These enhancements will support all students, regardless of age or need, in accessing inclusive and supportive learning environments that promote their academic and social-emotional growth. This work will require thoughtful planning, resource alignment, and ongoing evaluation, but it represents a critical step forward in achieving equitable outcomes for all students.

4) Continue to Build Trust with Families and Community Stakeholders

The relationship between BCSD and its families has faced challenges over the years, particularly around special education, where past issues have left lingering mistrust and skepticism among some families. While new leadership has taken meaningful steps to rebuild trust—engaging families through listening sessions, actionable planning, collaboration with SEPTO, and the creation of a Special Education subcommittee—challenges remain that make it difficult for all parties to work together effectively. Bridging this gap is essential, as the success of any educational system depends on a strong partnership between families and districts, rooted in mutual respect, collaboration, and a shared commitment to supporting all students.

It is critical for families and BCSD to come together and focus on moving forward because the well-being and success of students are at the center of this partnership. While it is natural for systems to face challenges as they evolve and adapt, the willingness to collaborate and respect each other's experiences, perceptions, and viewpoints can create a foundation for continuous improvement. Families bring invaluable insights into their children's needs, while the District offers professional expertise and resources to meet those needs. When these perspectives are aligned, the outcomes for students are exponentially stronger.

Change is rarely a seamless process, especially when it involves addressing systemic challenges and historical grievances. There will undoubtedly be moments of tension and disagreement, but these moments can serve as opportunities for growth and problem-solving when approached with respect and a shared purpose. Acknowledging that all stakeholders may have differing experiences and perceptions is key to fostering understanding and trust. For BCSD, this means continuing to listen actively, being transparent about processes, and consistently communicating its commitment to putting students first. For families, it means remaining open to the efforts of the District, engaging in good faith, and recognizing that progress often requires time, patience, and flexibility.

A strong partnership between families and BCSD also supports more inclusive decision-making that reflects the diverse needs of the community. By working together to develop solutions and embracing a spirit of collaboration, the District and families can navigate challenges with a focus on achieving the best possible outcomes for all students. Success stories and milestones should be celebrated as reminders of what is possible when trust and collaboration are prioritized, inspiring continued commitment from all parties.

Ultimately, the ability to come together and move beyond past grievances does not mean ignoring or forgetting past challenges; rather, it means learning from them to build a better future. The focus must remain on the present and future—on creating systems and supports that truly serve the needs of every student. Trust will not be rebuilt overnight, and there will be challenges along the way, but through mutual respect, transparency, and a shared vision for student success, BCSD and its families can forge a partnership that benefits not only their students but the entire community.

5) Stabilize Special Education Leadership and Priorities

Parents, BCSD leadership, and staff all echoed the importance of stabilized special education leadership and clear priorities to create shared expectations. However, the current variability of perspectives related to special education services provision has impacted building meaningful relationships and trust. As much as possible, all individuals with a vested interest in the success of students with disabilities in BCSD should support the stabilization of special education leadership. This includes embracing priorities communicated and utilizing structures to share input in purposeful ways.

The investments made throughout the District to support the accelerated growth of all students, particularly students with disabilities, cannot be underscored. As BCSD 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 BCSD has many strengths on which to build and can achieve high-quality programming for all students, especially those with disabilities, that PCG knows it seeks.

The Superintendent and BCSD senior leadership have publicly expressed commitment to making the changes necessary. The arrival of a new Director of Special Education 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, and clear, non-negotiable accountability measures. PCG strongly encourages BCSD 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 BCSD for its upward trajectory for years to come.

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

The essential question we answer in this chapter and subsequent areas of this report is:



How does BCSD perform regarding student outcomes and transition for students with disabilities?

Below are the overarching strengths and opportunities within the data reviewed on BCSD's State Performance Plan (SPP) and Results Driven Accountability.

Strengths	Opportunities for Improvement
<ul style="list-style-type: none"> • Education Environment. Of students receiving their education in the District, 72.9% of students with IEPs spent 80% or more of their day in the general education setting • Classification Rate. The rate at which BCSD classifies students with disabilities (17%) is lower than the state average (19%). • Graduation Rate. BCSD's graduation rate for students with disabilities (80%) surpasses the state target (68%). • Dropout Rate for SWDs. BCSD's dropout rate for students with disabilities (5%) is lower than the state average (8%). • Grade 8 ELA and Math Proficiency for SWDs. Grade 8 ELA Proficiency for SWDs increased significantly from 6% in 2021-22 to 26% in 2022-23, a 20 percentage point improvement, exceeding the 2022-23 state target of 22%. Similarly, Grade 8 Math Proficiency for SWDs rose dramatically from 4% in 2021-22 to 33% in 2022-23, a 29 percentage point increase, surpassing the 2022-23 state target of 17%. • High School Regents ELA Proficiency for SWDs. High School Regents ELA 	<ul style="list-style-type: none"> • Achievement Gap. There continues to be a substantial gap for students with disabilities compared to all students in the District across all subject areas on statewide assessments. • Grade 4 ELA Score for SWDs. Grade 4 ELA for SWD (13% Proficient) is markedly lower than SWoD (61% Proficient) and lower than the state average for SWD (20% Proficient). • Disproportionality. Multi Racial students are seven times more likely to be identified with Multiple Disabilities, Asian students are over twice as likely to be identified with Autism, Black/African American students with an Emotional Disability, and Hispanic students with a Speech/Language Impairment compared to other racial/ethnic groups. • Gender Disparity. Some 33% of students with disabilities are female, and 67% are male. • Dropout Rate for SWDs Trends. BCSD's dropout rate for students with disabilities has consistently remained below the state target over the past four years but has increased steadily: 2020 (0%), 2021 (0%), 2022 (5%), 2023 (5%).

<p>Proficiency for SWDs in 2022-23 reached 56%, exceeding the state target of 51%.</p> <ul style="list-style-type: none">• Grade 4 Math and High School Algebra Regents Proficiency for SWDs. In 2022-23, Grade 4 Math Proficiency for SWDs was 40%, exceeding the state average of 25% by 15 percentage points. High School Algebra Regents Proficiency for SWDs in 2022-23 was 64%, surpassing the state average of 36% by 28 percentage points.• Inclusive Opportunities for Students with IEPs. Among students with IEPs in grades 8-12 who responded to the survey (75%) report consistent access to after-school activities, highlighting BCSD's commitment to fostering inclusion and engagement beyond the classroom.	
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The New York State Education Department (NYSED), Office of Special Education Support 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 education agency (LEA) using one of the following four determination categories: "Meets Requirements," "Needs Assistance," "Needs Intervention," or "Needs Substantial Intervention."^{13 14} The Office of Special Education uses a determination rubric for indicators to evaluate the performance of each LEA in meeting the State's identified targets. The indicators evaluated are represented in the graphic within.

The analysis below provides BCSD with data trends that 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:

- Data snapshot from the 2023-24 school year provided by the District, including student-level data for students with IEPs.
- National data obtained from the National Center for Education Statistics Digest of Education Statistics
- State data and longitudinal data obtained from the New York State's Department of Education's Data Reporting Platform ¹⁵
- Additional disability incidence rate data for New York and the nation obtained from the US Department of Education's IDEA State Data Collection webpage¹⁶

¹³ In New York, LEAs are responsible for 14 of the 17 indicators.

¹⁴ 34 CFR §§300.600 and 300.604

¹⁵ Data retrieved from New York State Department of Education: <https://data.nysed.gov/>

¹⁶ IDEA Section 618 Data Products: State Level Data Files available at: <https://www2.ed.gov/programs/osepidea/618-data/state-level-data-files/index.html>

- Disaggregated assessment data from the BCSD District Plan 2024-27.

IDEA Part B Indicators

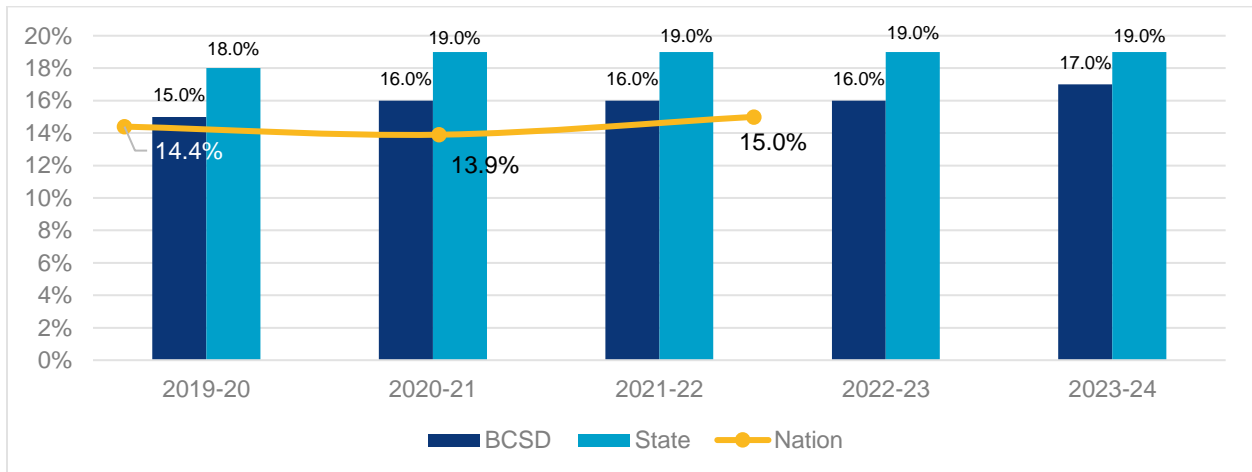
- Indicator 1: Graduation Rate
- Indicator 2: Dropout Rate
- Indicator 3: Assessment (Participation and Performance)
- Indicator 4: Rates of Suspension
- Indicator 5: Least Restrictive Environment (LRE), Age 6-21
- Indicator 6: Preschool LRE, Age 3-5
- Indicator 7: Preschool Outcomes
- Indicator 8: Parent 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

BCSD SPECIAL EDUCATION DEMOGRAPHICS

The following section includes an analysis of BCSD special education demographic data disaggregated by relevant student population groups. Where appropriate, a comparison analysis of state and national data is included.

From 2019-2020 to 2022-2023, between 15 -16% of BCSD school-aged students had an IEP. This was lower than the state average which ranged between 17-19%. The national average during this same period ranged between 13.9-15%. Between 2023-2024, the percentage of BCSD students who had an IEP increased by 1 percentage point to 17%. From a purely numerical perspective, these figures suggest that BCSD is generally classifying students with disabilities at rates that align with both state and national trends. However, this does not account for individual experiences or the nuances of the eligibility process.

EXHIBIT 2. PERCENTAGE OF BCSD STUDENTS (GRADES K-12) WITH IEPs COMPARED TO STATE AND NATIONAL INCIDENCE RATES (AGES 6-21), 2019-20 TO 2023-24^{17 18 19}

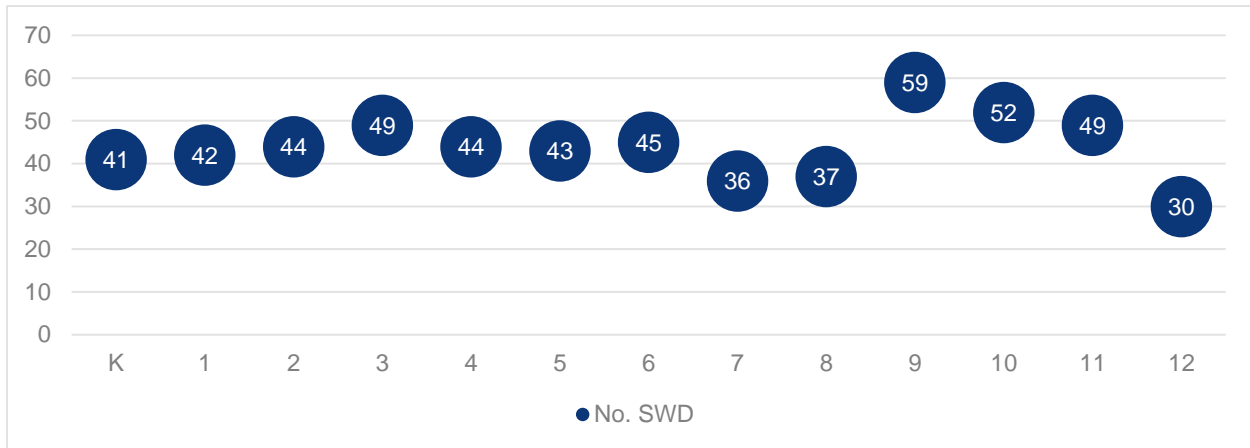


¹⁷ District and State data obtained from NY State Data Portal: <https://data.nysed.gov/>.

¹⁸ District data for 2023-24 was provided by BCSD in Fall 2024.

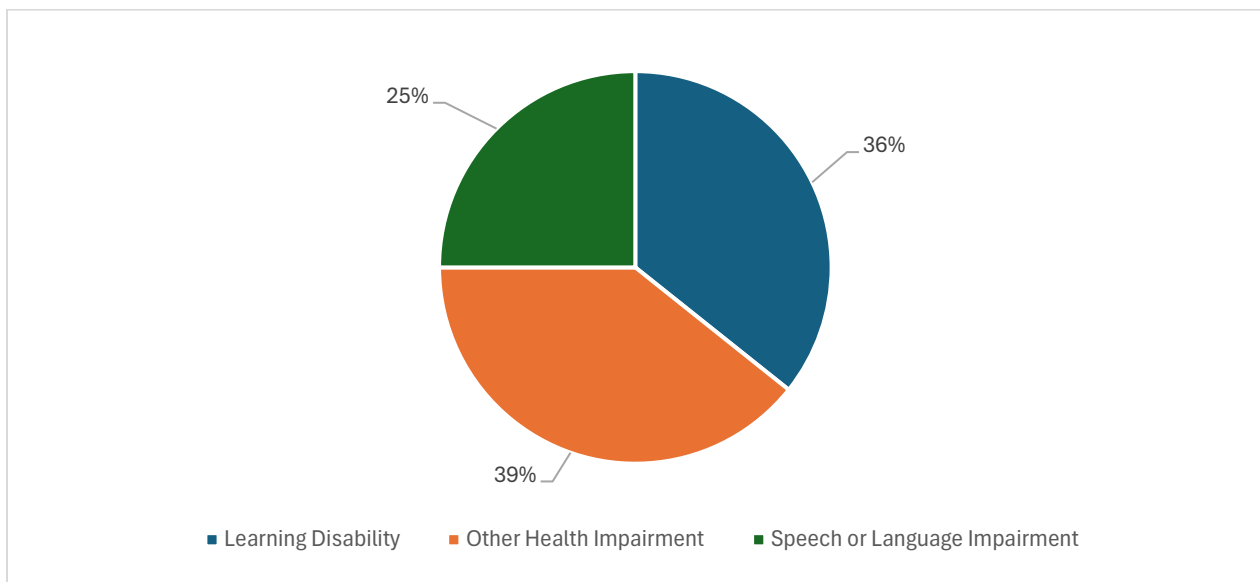
¹⁹ National data obtained from National Center for Education Statistics Digest of Education Statistics: <https://nces.ed.gov/programs/digest/>.

EXHIBIT 3. NUMBER OF STUDENTS WITH IEPs BY GRADE, GRADES K-12, 2023-24²⁰



During the 2023-24 school year, the number of students with IEPs from kindergarten to grade eight remained stable. However, there was a notable increase in the number of students with IEPs in grades nine and ten, with an especially significant jump of 21 students between grades eight and nine. This unusual increase warrants further analysis by the District to understand its underlying causes. Potential factors could include a higher than usual number of students being newly identified as eligible for special education services in later grades, which is uncommon at this stage of education. Alternatively, this increase could be linked to students being retained in 9th grade or increased student transfers from other districts. However, it will be important to explore the referral and evaluation processes in 9th grade to rule out any inconsistencies in practices.

EXHIBIT 4. NUMBER AND CLASSIFICATION OF STUDENTS (GRADES K-12) DECLASSIFIED FROM SPECIAL EDUCATION, DECEMBER 2023 TO JANUARY 2024²¹



Between December 2023 to January 2024, 28 students were declassified from special education. Only students with classifications of Learning Disability, OHI, and Speech or Language Impairment were

²⁰ Data snapshot provided by BCSD in Fall 2024.

²¹ Ibid.

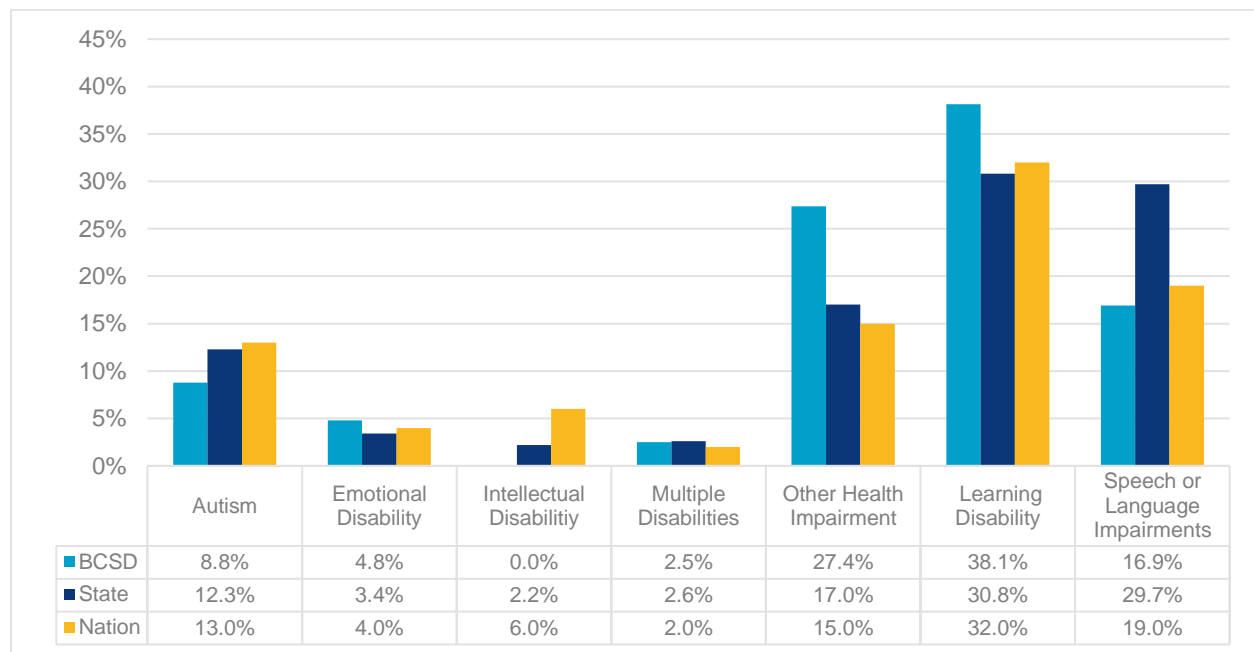
declassified. Of those students, 39% were classified under OHI, 25% were classified under Speech or Language Impairment, and 36% were classified under Learning Disability. Of these students, four transitioned to a Section 504 Plan.

SCHOOL-AGED STUDENTS: IDENTIFICATION, ACHIEVEMENT & PLACEMENT

Identification by Disability Category: District, State, and Nation

BCSD has a higher percentage of students with Other Health Impairments (27.4%) compared to the state (17.0%) and nation (15.0%). For students identified with a Learning Disability, BCSD has a higher percentage of students identified (38.1%) compared to the state (30.8%) and nation (32.0%). For students with Autism, BCSD has a lower percentage (8.8%) of students identified than the state (12.3%) and the nation (13.0%). The percentage of students with speech and language impairments (29.7%) in the state is considerably higher than both BCSD (16.9%) and the nation (19.0%). BCSD has two students classified as having an Intellectual Disability who are being served in out-of-district placements. While we do not have directly comparable percentages, for context, 2.2% of students statewide and 6% of students nationwide are classified under this disability category.

Exhibit 5. Percentage of BCSD SWD by Disability Area Compared to State and Nation (Ages 6-21), 2022-23^{22 23}



Identification by Race/Ethnicity

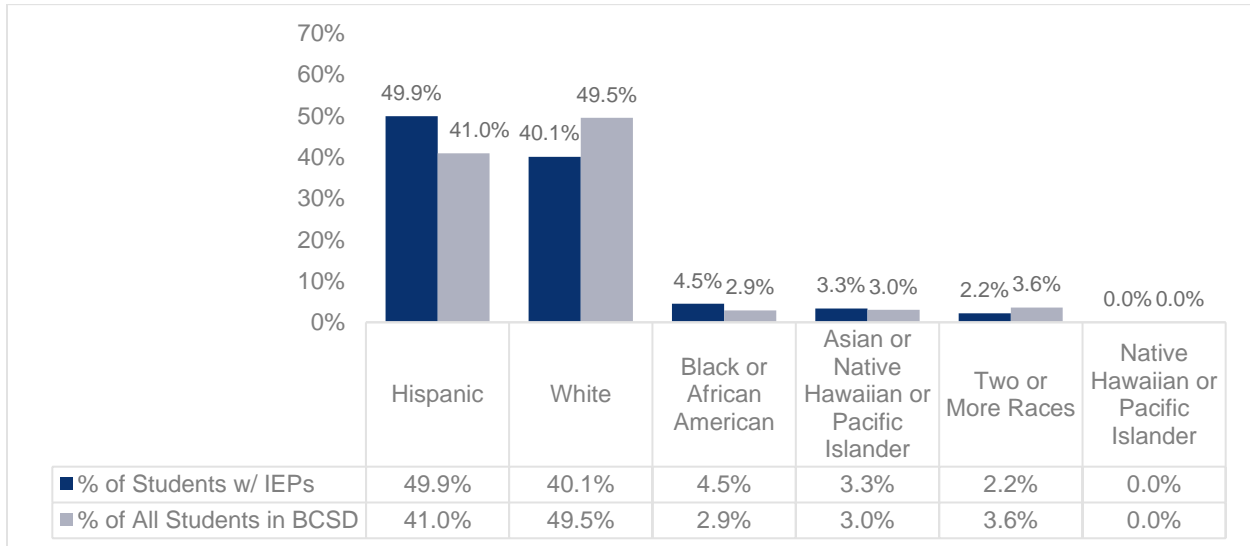
The exhibit below shows the composition of each racial/ethnic group of identified students based on enrollments for each demographic group. When compared to the District demographic breakdown by race/ethnicity, the percentage of students with IEPs in each demographic group was aligned with the percentage of all students in each demographic group in the District. Hispanic students make up 41% of

²² BCSD incidence data obtained from NY Special Education Data Collection, Analysis and Reporting (SEDCAR): <https://www.p12.nysed.gov/sedcar/state.html>; National data obtained from the National Center for Education Statistics Digest of Education Statistics: <https://www.p12.nysed.gov/sedcar/state.html>; State/ Nation data retrieved from: <https://www2.ed.gov/programs/osepidea/618-data/static-tables/index.html>.

²³ District and State data obtained from NY State Data Portal: <https://data.nysed.gov/>

all students in the District and 49.9% of students with IEPs in the District. White students make up 49.5% of all students in the District and 40.1% of students with IEPs in the District. For Hispanic students, Black students, and Asian or Native Hawaiian or Pacific Islander students, the percentage of students of these race/ethnicity backgrounds with IEPs is slightly higher than would be expected given their overall representation in BCSD’s student population. Conversely, White students and students of Two or More races, the percentage of students with IEPs is slightly lower than would be expected given their overall representation in the District’s student population. Comparing the demographic breakdown of students with IEPs to all students in the District is a useful preliminary method for ongoing monitoring to prevent the overidentification of any specific race or ethnicity subgroup for special education services.

EXHIBIT 6. PERCENT OF BCSD STUDENTS WITH IEPs (AGE 6-21) BY RACE/ETHNICITY, 2023-24²⁴



Risk Ratio

One of the most useful, informative, and proactive methods used to calculate disproportionality "is the risk ratio, which compares one racial/ethnic group's risk of receiving special education and related services to that of all other students."²⁵ The risk ratio can be used to calculate disproportionality at both the state and district levels. The analysis below is intended to provide BCSD with a tool to calculate risk ratios 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.²⁶ 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;

²⁴ NY State data retrieved from: <https://data.nysed.gov/enrollment.php?instid=800000035721&year=2024>; Data presented does not include CPSE (Preschoolers with disabilities, and SWDs identified in grade "GED").

²⁵ 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.

²⁶ Office of Special Education and Rehabilitative Services, U.S. Department of Education. (2016, February).

Racial and Ethnic Disparities in Special Education: A Multi-Year Disproportionality Analysis by State, Analysis Category, and Race/Ethnicity. <https://files.eric.ed.gov/fulltext/ED576130.pdf>

- 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:²⁷

EXHIBIT 7. GENERAL RISK EQUATION

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

As shown below, a risk ratio greater than 2.0 of 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 for students based on race/ethnicity and disability classification is 4.0.²⁸

In education, risk ratios are commonly used to assess disproportionality in special education, particularly in areas like identification, placement, and discipline of students by race/ethnicity or disability status.²⁹ The most appropriate threshold for interpreting disproportionality depends on the context, but best practices generally suggest lower risk ratio thresholds than those typically set by states.

Common Practice vs. Best Practices:

- *Federal and State Guidelines:* Under IDEA, states must monitor disproportionality, and many states define significant disproportionality with a risk ratio of **3.0 to 4.0**. This means that a group is considered disproportionately affected if it is three to four times more likely than the reference group to experience a particular outcome (e.g., identification for special education).
- *Best Practices:* Research and equity-focused frameworks often argue that a risk ratio closer to **2.0** is a more sensitive and fair measure of disproportionality. This lower threshold acknowledges disparities earlier and prompts intervention before disparities become more pronounced.³⁰

Why 2.0 is Often Recommended:³¹

1. *Equity Considerations:* A risk ratio of 3.0 or higher can overlook less extreme but still concerning disparities that negatively impact smaller populations or marginalized groups.

²⁷ PCG analyzed student populations with at least 10 students in a particular race/ethnicity group with an IEP and at least 5 students with a specific disability classification.

²⁸ 2020-21 Criteria for Notification of Disproportionality. NYSED IRS. (n.d.). https://www.p12.nysed.gov/sedcar/forms/instructions/spp_criteria/sigdispro2021.html

²⁹ U.S. Department of Education. (n.d.) OSEP monitoring – Significant disproportionality reporting under IDEA Part B. <https://www.ed.gov/laws-and-policy/students-disabilities-laws-and-policy/osep-monitoring--significant-disproportionality-reporting-under-idea-part-b>

³⁰ Bollmer, J., Bethel, J., Garrison-Mogren, R., & Brauen, M. (2007). Using the Risk Ratio to Assess Racial/Ethnic Disproportionality in Special Education at the School-District Level [Review of *Using the Risk Ratio to Assess Racial/Ethnic Disproportionality in Special Education at the School-District Level*]. *The Journal of Special Education*, 41(3), 186–198.

³¹ Ibid.

2. *Prevention Focus:* Lower thresholds allow districts to intervene earlier, reducing the long-term effects of disproportionality on student outcomes.
3. *Research Alignment:* Studies have shown that risk ratios above 2.0 already signal significant inequities in access to services, discipline practices, or placement in restrictive settings.

Example Application:

If Black students have a risk ratio of 3.5 for being identified as having an emotional disturbance compared to White students, this will meet many states' thresholds but may fail to address underlying inequities if best practices of 2.0 were applied. Conversely, identifying and addressing disproportionality at a 2.0 risk ratio threshold enables earlier policy or programmatic responses.

While thresholds like 3.0 or 4.0 align with federal requirements and state practices, adopting a 2.0 risk ratio threshold aligns better with proactive and equitable approaches to addressing disproportionality. Districts seeking to improve outcomes for all students may benefit from adopting lower thresholds in their data monitoring systems and equity initiatives.

For further reading, consult sources such as:

- IDEA's regulations on disproportionality monitoring³²
- Research studies on risk ratios and equity, including work by the National Center for Culturally Responsive Educational Systems (NCCREST).³³

PCG conducted a risk ratio analysis of BCSD data to identify areas where over-identification of students with disabilities based on disability, race, educational setting, and discipline may be occurring. 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 displayed in the exhibit below, Multi Racial students are seven times more likely to be identified with Multiple Disabilities when compared to other race/ethnicity groups. Asian students are more than twice as likely to be identified with Autism when compared to other race/ethnicity groups. In addition, Black or African American students are more than twice as likely to be identified with an Emotional Disability when compared to other race/ethnicity groups. Furthermore, Hispanic students are more than twice as likely to be identified as having a Speech/Language impairment when compared to other race/ethnicity groups. The data on these three subgroups of students indicate a higher risk of over-identification due to having risk ratios greater than 2.0. Additionally, White students are more than 1.73 times as likely to be identified under "Other Health Impairment" when compared to other race/ethnicity groups which is approaching higher risk for over-identification.

³² U.S. Department of Education. (n.d.) *OSEP monitoring – Significant disproportionality reporting under IDEA Part B*. <https://www.ed.gov/laws-and-policy/students-disabilities-laws-and-policy/osep-monitoring--significant-disproportionality-reporting-under-idea-part-b>

³³ National Center for Culturally Responsive Education Systems. (n.d.). *NCCREST*. <https://nccrest.edreform.net/>

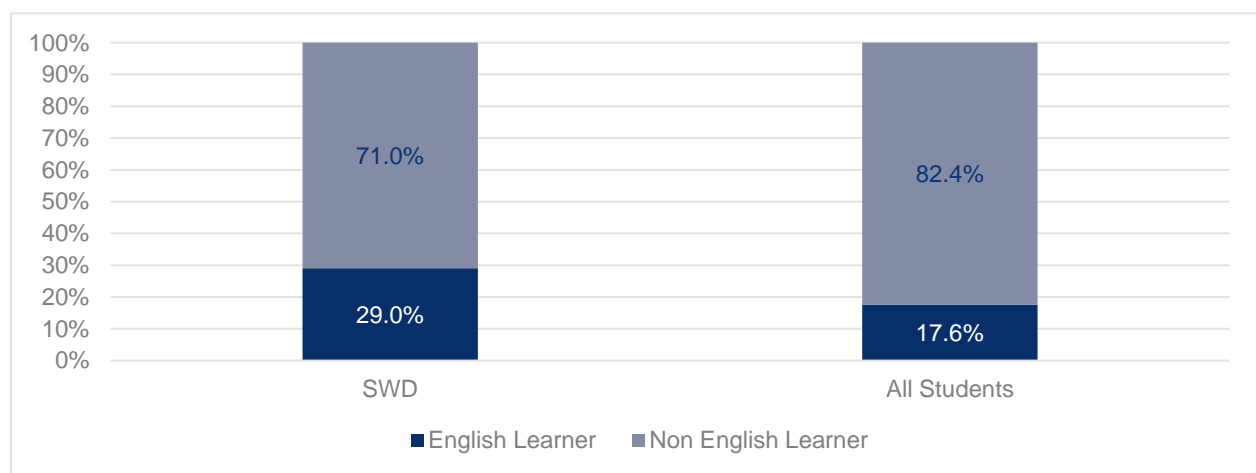
EXHIBIT 8. RISK RATIOS BY RACE/ETHNICITY AND DISABILITY, 2023-24³⁴



Eligibility by English Learner Status

In BCSD, 17.6% of students are English language learners (ELLs). Of students with IEPs, 29% are ELLs. These data demonstrate that there is a notable overlap between English language learners and students with special education needs in BCSD. This intersection highlights the potential for overidentification of ELL students with disabilities.

EXHIBIT 9. PERCENT OF BCSD STUDENTS AGES 6-21 BY ELL STATUS, 2023-24³⁵

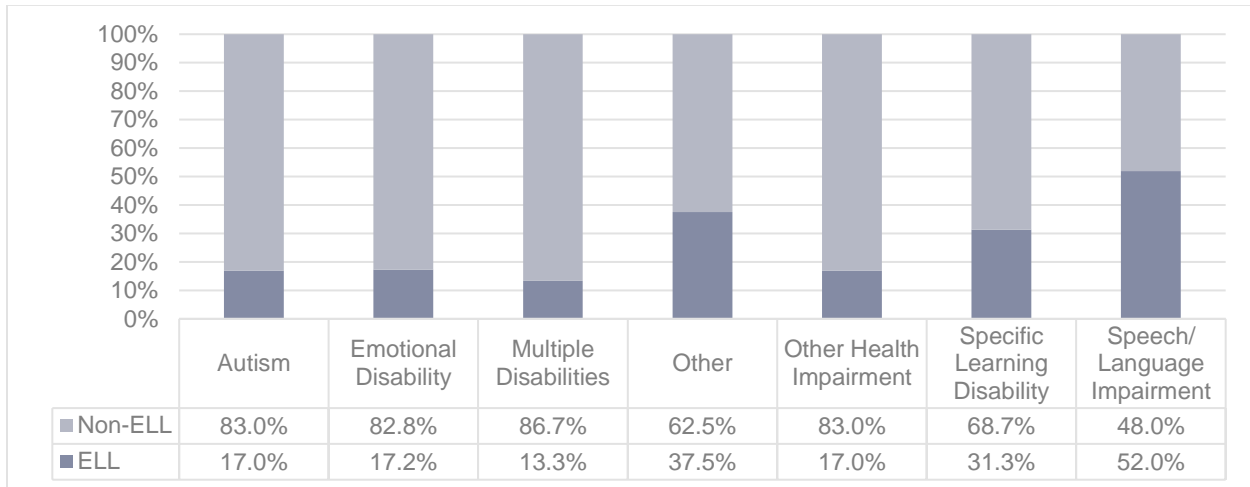


³⁴ Data snapshot provided by BCSD in Fall 2024

³⁵ Ibid.

Of students with IEPs, 52% of students eligible for services under Speech Language Impairment are ELLs, 37.5% of students who are eligible under Other³⁶, and 31.3% of students with a Learning Disability are ELLs. These categories were higher than the overall percentage of students with an IEP who are also ELLs (29%). These data demonstrate the notable proportion of ELL students classified with a speech and language impairment and highlights the potential overidentification of ELL students with this disability classification.

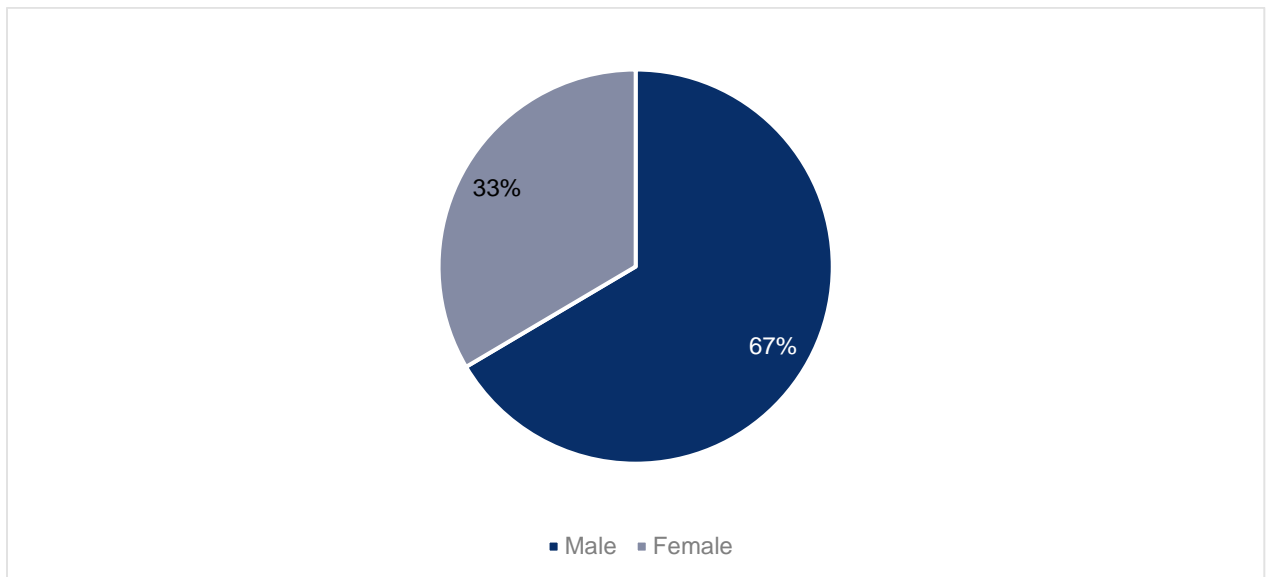
EXHIBIT 10. PERCENTAGE OF BCSD STUDENTS WITH IEPs BY DISABILITY AREA ELL STATUS, 2023-24³⁷



Identification by Gender

In BCSD, of students with IEPs, 33% are female, and 67% are male.

EXHIBIT 11. PERCENT OF STUDENTS WITH DISABILITIES BY GENDER, (AGES 6-21), 2023-24³⁸

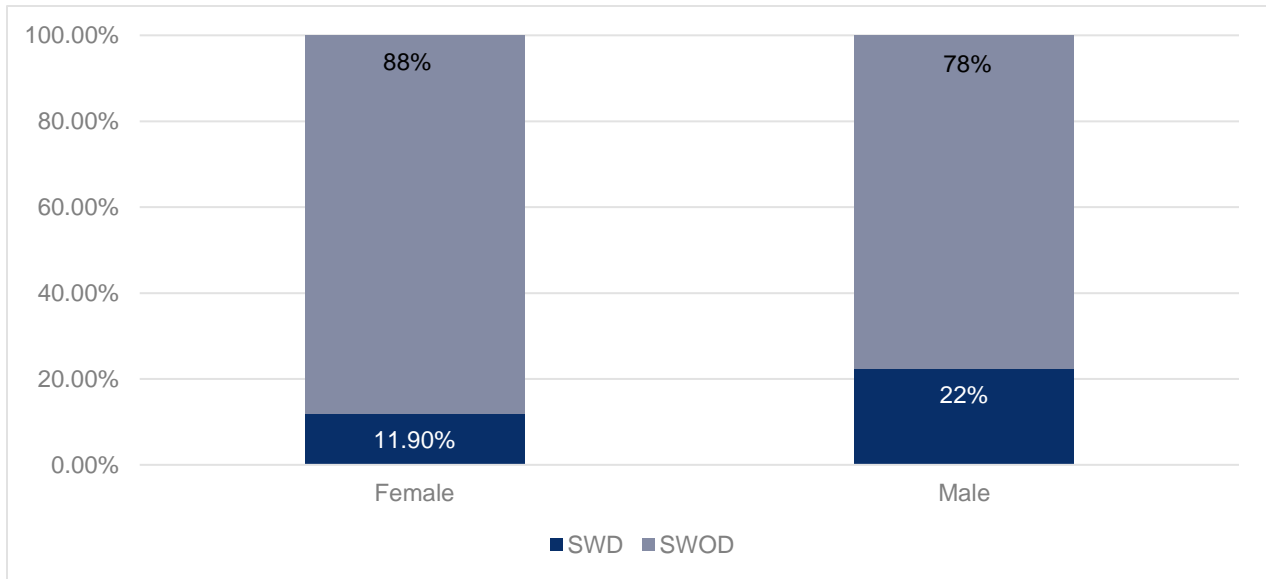


³⁶ Orthopedic impairment, traumatic brain injury, hearing impairment, and visual impairment were combined into the “other” category represented due to the small number of students in each disability classification.

³⁷ Data snapshot provided by BCSD in Fall 2024

³⁸ Ibid.

EXHIBIT 12. PERCENT OF BCSD FEMALE VS. MALE STUDENTS BY SWD vs. SWOD, 2023-2024³⁹



Out of all female students in BCSD, 11.9% are students with IEPs. Out of all male students in BCSD, 22% are students with IEPs. Taken together, these data points demonstrate that most of the population of students with disabilities in BCSD are male (67%), and that a higher percentage of male students (22%) than female students (11.9%) have disabilities in BCSD.

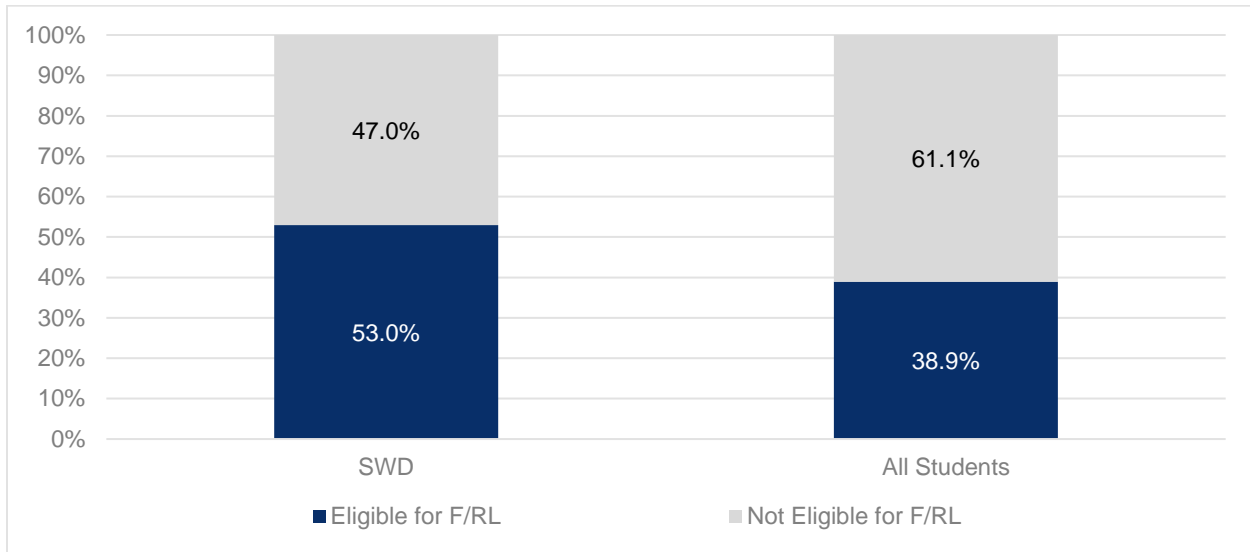
Eligibility by Free and Reduced Lunch Price Status

In BCSD, 38.9% of all students qualify for free or reduced-price lunch (FRPL), while 53% of students with IEPs are FRPL-eligible, indicating a higher concentration of economically disadvantaged students in special education. This discrepancy raises concerns about potential inequities in the identification process, as external factors like poverty, limited access to early interventions, or trauma may contribute to higher referral rates for special education services among low-income students.

While it is not uncommon for economically disadvantaged students to be overrepresented in special education, this trend warrants further examination. The District should explore whether systemic issues, such as inequitable referral practices or insufficient general education supports, are contributing to this pattern. Addressing these questions is critical to appropriately identifying and supporting students without bias or misidentification.

³⁹ Data snapshot provided by BCSD in Fall 2024

EXHIBIT 13. PERCENT OF BCSD STUDENTS ELIGIBLE FOR FREE/REDUCED LUNCH BY DISABILITY ELIGIBILITY, (AGES 6-21), 2023-24⁴⁰



ACADEMIC PERFORMANCE

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

New York State Testing Program

English Language Arts (ELA) and Mathematics assessment results from 2017-2018 to 2022-23 for students with and without disabilities were analyzed to understand the extent to which achievement gaps exist. The percentage of students who scored proficient for the following three grade levels were analyzed: fourth, eighth, and high school Regents (ELA and Algebra I).

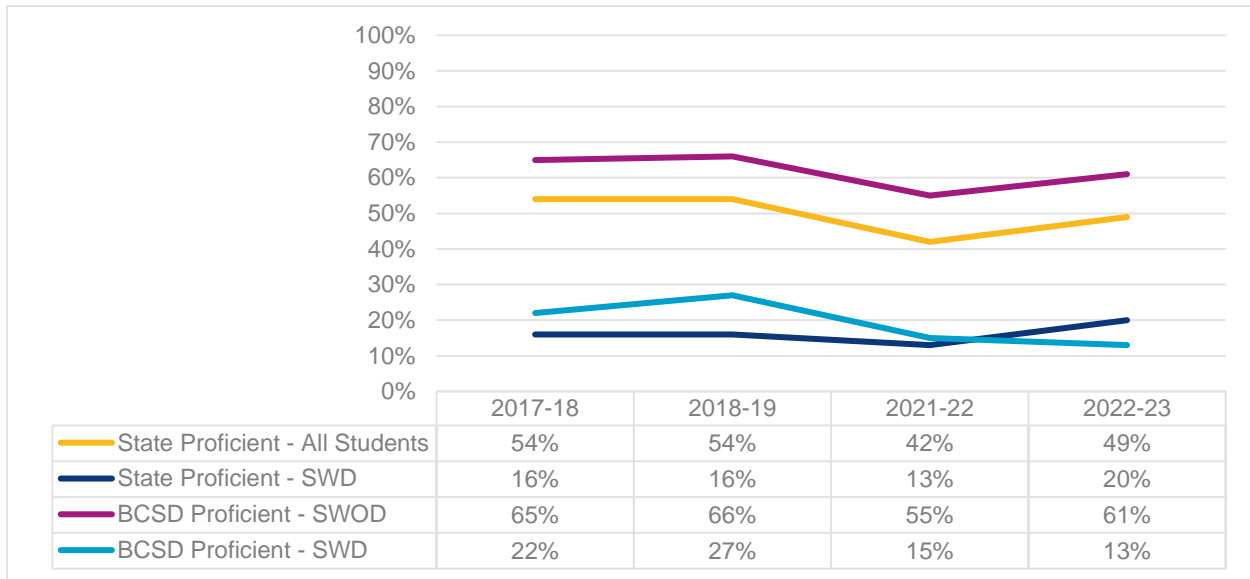
It is important to note that some of the declines seen in the data below align with the widespread impact of the COVID-19 pandemic, which disrupted learning nationwide. The shift to remote learning disproportionately affected students with disabilities, many of whom rely on structured supports, specialized instruction, and in-person services to access the curriculum effectively. Additionally, gaps in technology access, challenges with virtual delivery of special education services, and reduced opportunities for early intervention likely compounded learning losses for students in BCSD. These factors, coupled with national trends in delayed academic recovery for students with disabilities, could explain the decline in proficiency rates during and after the pandemic.

English Language Arts

BCSD's proficiency rates for SWDs in Grade 4 ELA showed a decline over the years, in contrast to the state's trend of improvement. Starting at 22 percent in 2017-18 (compared to the state's 16%), BCSD's scores improved slightly to 27 percent in 2018-19 (state remained at 16%). However, after this peak, there was a drop to 15 percent in 2021-22 (state at 13%), followed by a further decline to 13 percent in 2022-23, while the state improved to 20 percent. By the end of the period, BCSD's performance fell below the state average for students with disabilities.

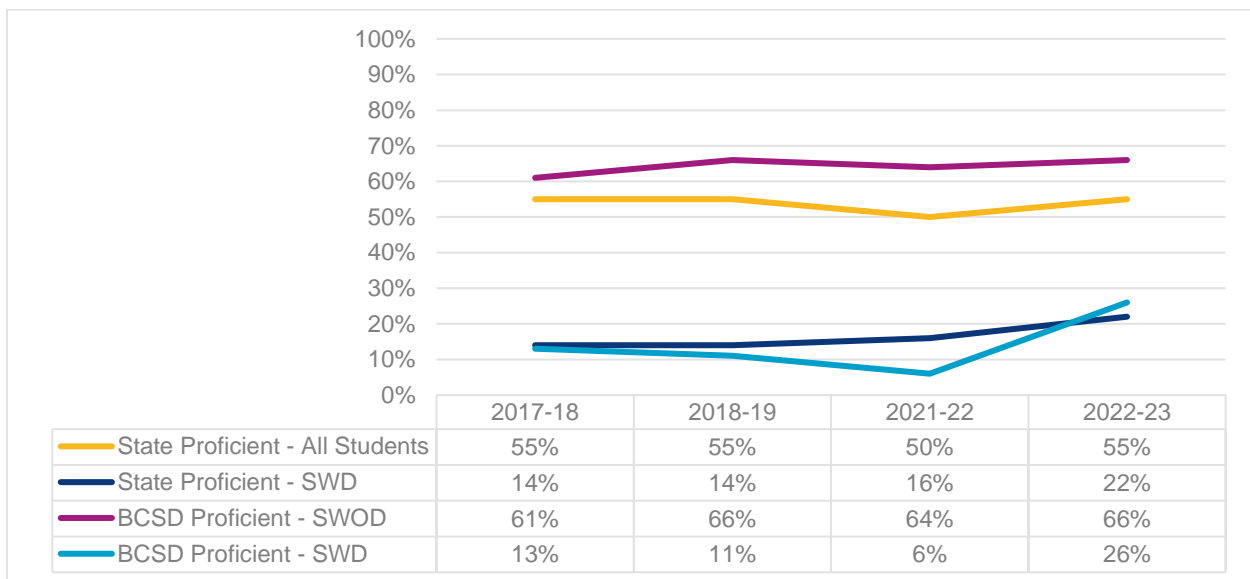
⁴⁰ Ibid.

EXHIBIT 14. GRADE 4 ELA, 2017-18 THROUGH 2022-23⁴¹



Proficiency rates for students with disabilities in Grade 8 Reading at BCSD showed significant variation, while the proficiency of students across the state demonstrated steady improvement. BCSD scores started at 13% in 2017-18 (compared to the state's 14%) and dropped slightly to 11% in 2018-19 (state remained at 14%). A decrease in proficiency occurred in 2021-22, with BCSD proficiency falling to just 6% (state improved to 16%). However, BCSD experienced a marked improvement in 2022-23, with proficiency rates rising to 26%, surpassing the state's improved rate of 22%.

EXHIBIT 15. GRADE 8 ELA, 2017-18 THROUGH 2022-23⁴²



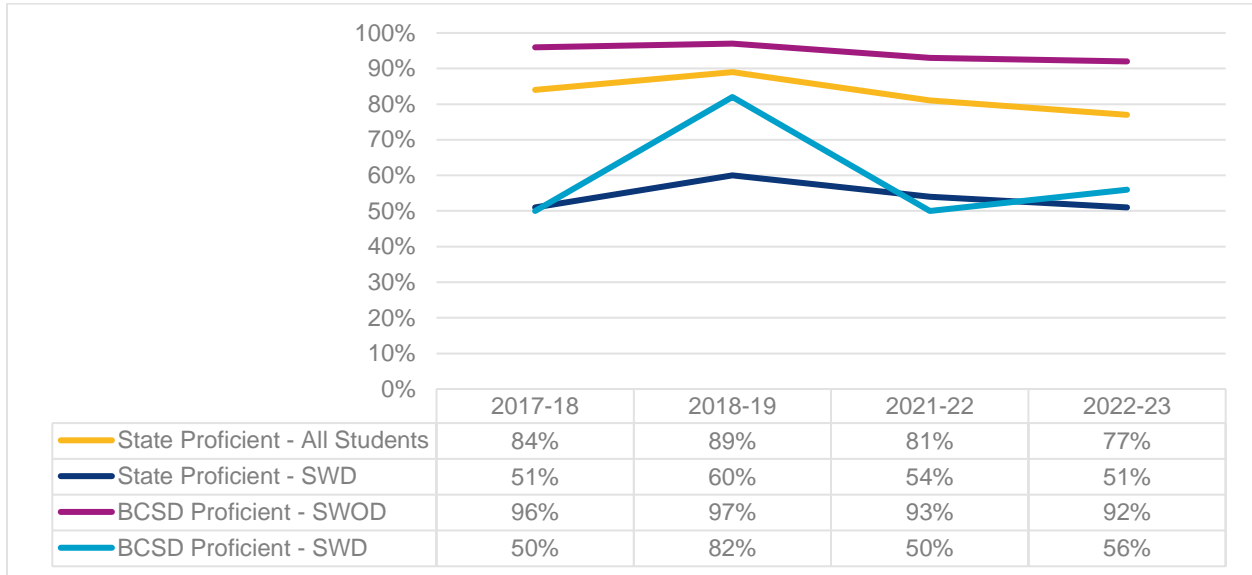
The HS ELA Regents proficiency rates for students with disabilities at BCSD showed notable shifts over time, generally outperforming students with disabilities in the state. BCSD proficiency began at 50% in 2017-18 (state at 51%) and rose significantly to 82% in 2018-19 (state at 60%). However, this high point

⁴¹ Data retrieved from NY State Data Portal: <https://data.nysed.gov/>.

⁴² Data was obtained from NY State Data Portal: <https://data.nysed.gov/>.

was followed by a decline back to 50% in 2021-22 (state at 54%). In the most recent year, BCSD scores improved slightly to 56%, while the state decreased to 51%. Despite these variations in proficiency rates, BCSD maintained higher rates than the state over the last three years.

EXHIBIT 16. HS ELA REGENTS, 2017-18 THROUGH 2022-23⁴³

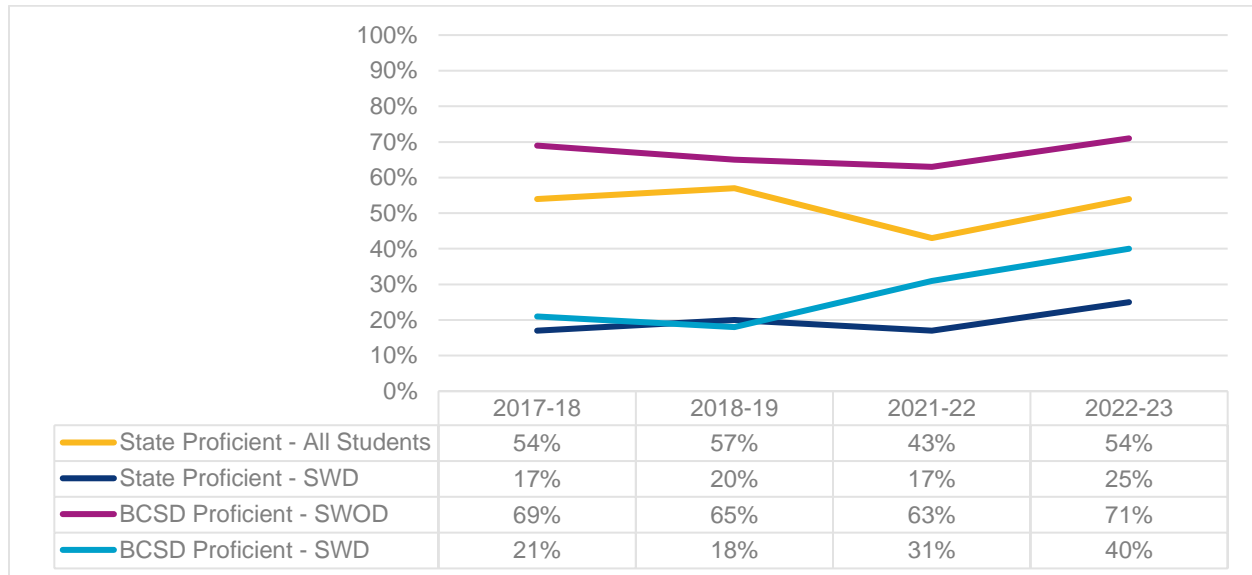


⁴³ Ibid.

Mathematics

BCSD's proficiency rates for students with disabilities in Grade 4 Math displayed an upward trend over time, consistently outperforming the rates of students with disabilities across the state. Starting at 21% in 2017-18 (state at 17%), there was a slight dip to 18% in 2018-19 (state at 20%). From there, BCSD proficiency rates improved significantly, rising to 31% in 2021-22 (state at 17%) and further increasing to 40% in 2022-23, while the state improved to 25 percent. BCSD's improvement was more pronounced than the state over this period. The COVID-19 pandemic likely impacted scores during the 2021-22 school year.

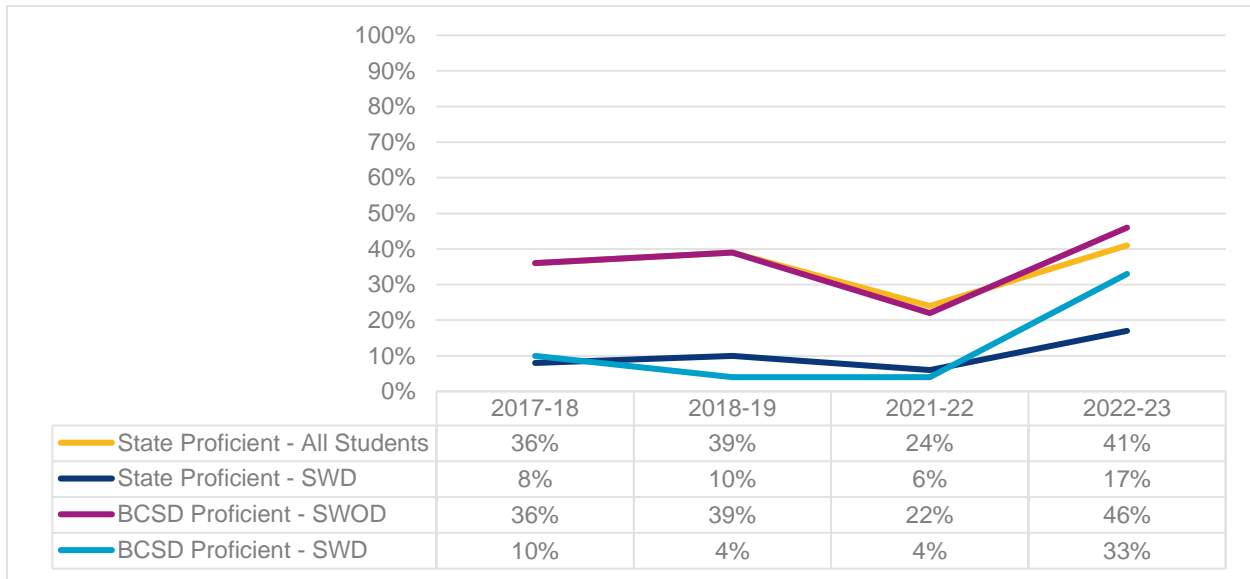
EXHIBIT 17. GRADE 4 MATH, 2017-18 THROUGH 2022-23⁴⁴



Grade 8 Math proficiency rates for students with disabilities at BCSD followed a U-shaped trend, ending higher than the rates of students with disabilities across the state. BCSD scores started at 10% in 2017-18 (state at 8%) but dropped to just 4% in both 2018-19 and 2021-22 (state at 10% and 6% respectively). However, BCSD saw an increase in 2022-23, with proficiency rates moving to 33%, nearly doubling the state's improved rate of 17%.

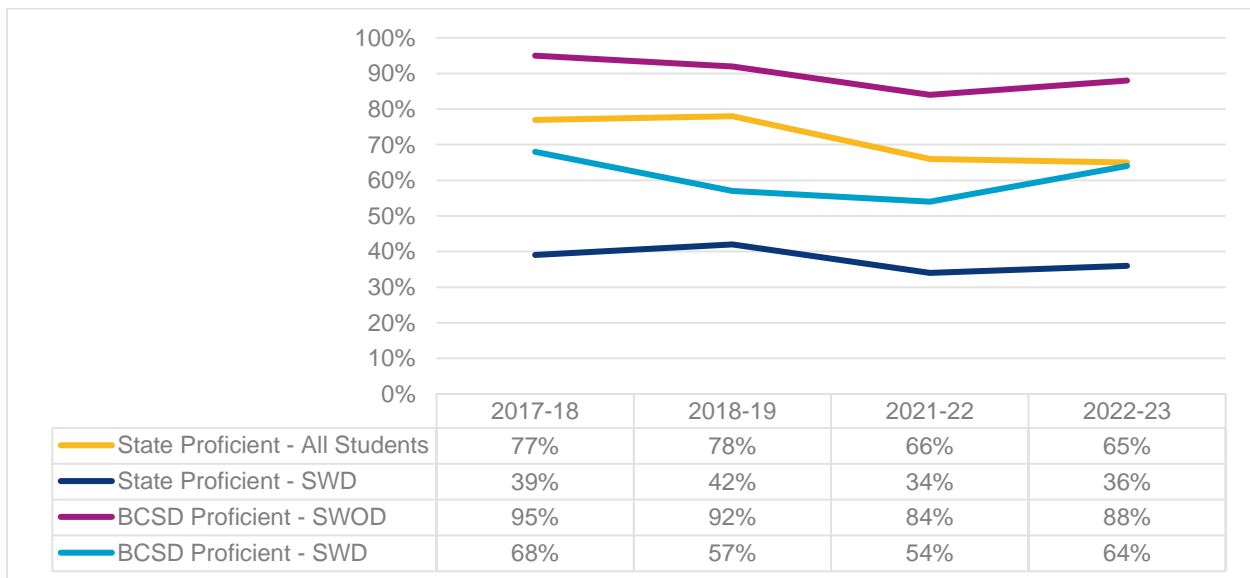
⁴⁴ Data was obtained from NY State Data Portal: <https://data.nysed.gov/>.

EXHIBIT 18. GRADE 8 MATH, 2017-18 THROUGH 2022-23⁴⁵



Algebra I Regents proficiency rates for students with disabilities at BCSD consistently outperformed students with disabilities across the state, despite fluctuations. Starting at 68% in 2017-18 (state at 39%), BCSD scores dropped to 57% in 2018-19 (state at 42%) and further declined to 54% in 2021-22 (state at 34%). However, there was a recovery to 64% proficiency by 2022-23, while the state improved to 36%. The COVID-19 pandemic likely impacted the drop in scores for the 2021-22 school year.

EXHIBIT 19. ALGEBRA I REGENTS, 2017-18 THROUGH 2022-23⁴⁶



⁴⁵ Ibid.

⁴⁶ Ibid.

Graduation and Dropout

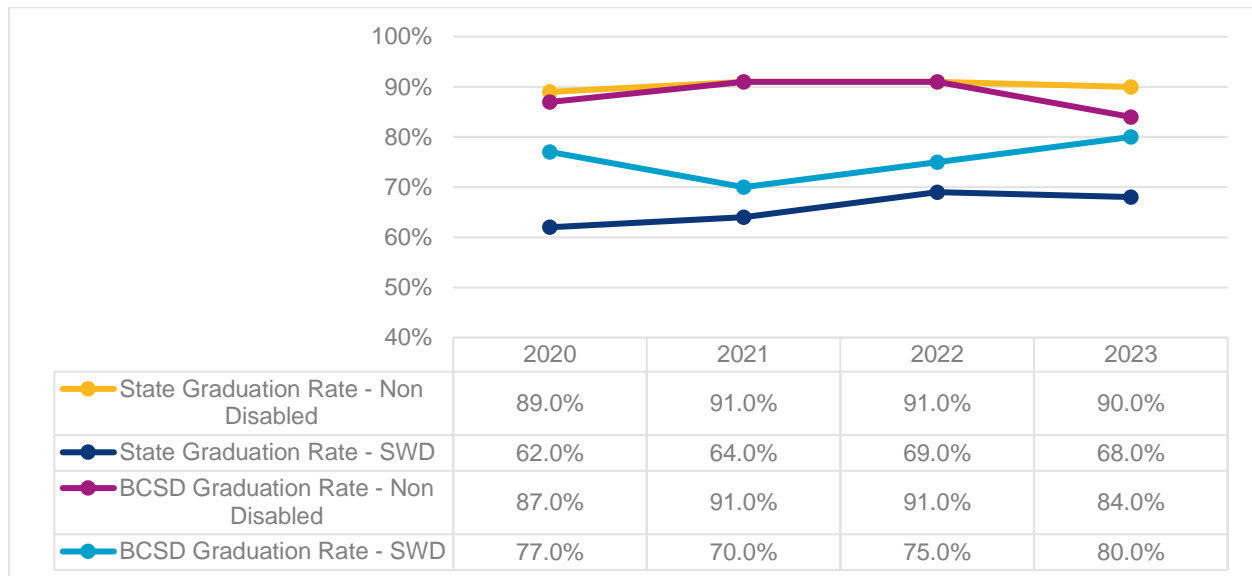
Graduation and dropout data between 2020 to 2023 was analyzed for students with disabilities and those without, both within BCSD and across the state.

Graduation Rates

When compared to the state graduation rate for students with disabilities, BCSD was notably higher than the state at 80% (with the state average at 68%). BCSD's graduation rate for students with disabilities has been notably higher than the state over the years. However, students with disabilities continue to graduate at lower rates than their non-disabled peers in the District, with 90% for non-disabled peers (compared to 80% for students with disabilities).

In NY state students may graduate through multiple pathways to graduation, allowing students to use a passing score on an approved pathway assessment or successful completion of program requirements for the Career Development and Occupational Studies (CDOS) credential toward meeting the assessment requirements to graduation. Looking at the 2022-23, 2021-22, 2020-21, and 2019-20 school years, only four students with disabilities have pursued the CDOS credential.⁴⁷

EXHIBIT 20. PERCENTAGE OF BCSD STUDENTS WITH IEPs GRADUATING COMPARED TO STATE AVERAGES, 2020-2023⁴⁸



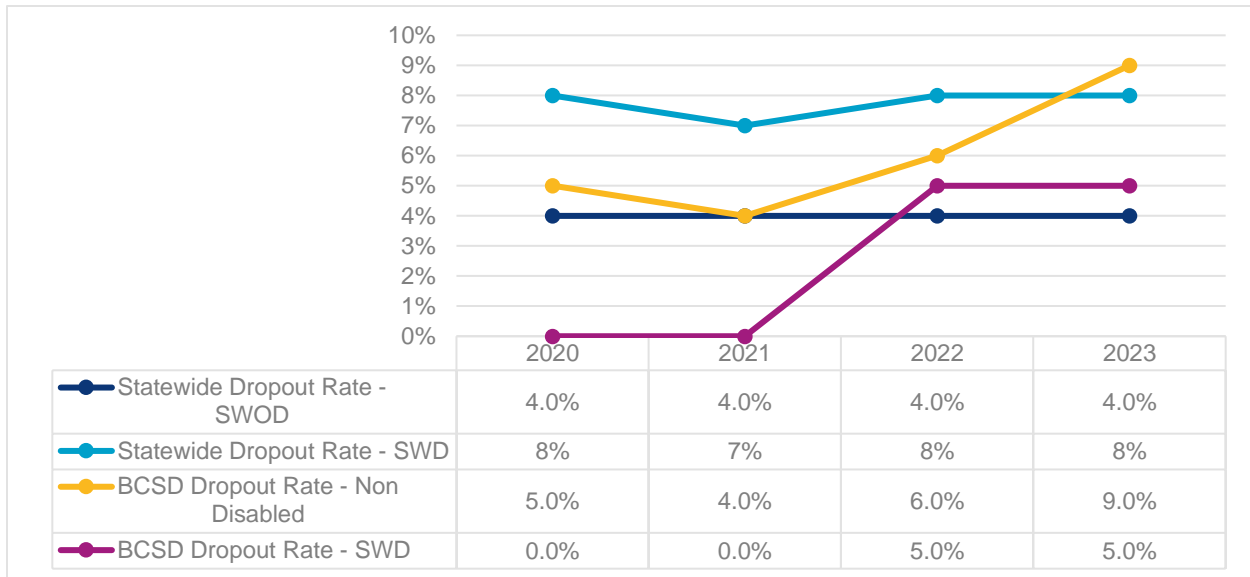
Dropout Rates

Between 2020 and 2023, the dropout rate for students with disabilities in BCSD was consistently lower than both the dropout rate for non-disabled students in the District and the statewide rate for students with disabilities. However, in the last two years, the dropout rate for students with disabilities increased from 0% to 5%. Due to the small student population in BCSD, even a single student dropping out has a significant impact on this percentage. For example, as shown in Exhibit 2, there were only 30 students in 12th grade during the 2023-24 school year. If one student were to drop out, the dropout rate would rise substantially, highlighting how small changes in numbers can disproportionately affect the data.

⁴⁷ Bedford CSD Graduation Pathways Data available at: <https://data.nysed.gov/pathways.php?year=2023&instid=800000035721>; <https://data.nysed.gov/pathways.php?year=2022&instid=800000035721>; <https://data.nysed.gov/pathways.php?year=2021&instid=800000035721>; <https://data.nysed.gov/pathways.php?year=2020&instid=800000035721>

⁴⁸ Data was obtained from NY State Data Portal: <https://data.nysed.gov/>.

EXHIBIT 21. DROPOUT RATE OF STUDENTS WITH IEPs COMPARED TO STATE AVERAGES, 2020-2023⁴⁹



EDUCATIONAL ENVIRONMENT FOR LEARNING: SCHOOL-AGED STUDENTS

The data in this section reflect educational setting rates of all BCSD school-aged students identified for special education. Figures are also shown by disability areas, and by race/ethnicity.⁵⁰ In addition, BCSD data are compared to state and national data, and State Performance Plan (SPP) targets for the three educational setting categories monitored by OSEP and NYSED for students age 6-21⁵¹ ED requires each state to monitor and set targets in their SPP for educational settings in which identified students are educated.

Educational Settings for BCSD, New York, and SPP Targets

Longitudinal data from 2020-21 through 2022-23 indicated BCSD students with disabilities were educated increasingly more often in an inclusive general education setting⁵² In 2021-2022 and 2022-23, BCSD progressively met state targets for students who spent 80% or more of their school day in general education. For the past three years of data analyzed, BCSD met the state target for educating students less than 40% of the time in the general education setting and in separate settings.

- General Education Setting more than 80% of the time.** Since 2020-21, the percentage of students in this setting decreased by 2.3 percentage points. While this percentage has decreased slightly, BCSD consistently met the state target for this setting for the past three years of data analyzed.

⁴⁹ Ibid.

⁵⁰ NYSDE State Performance Plan follows this federal guidance on how to report students by education environment: Percent of children with IEPs aged 6 through 21 served: A. Inside the regular class 80% or more of the day; B. Inside the regular class less than 40% of the day; and C. In separate schools, residential facilities, or homebound/hospital placements. (20 U.S.C. 1416(a)(3)(A))

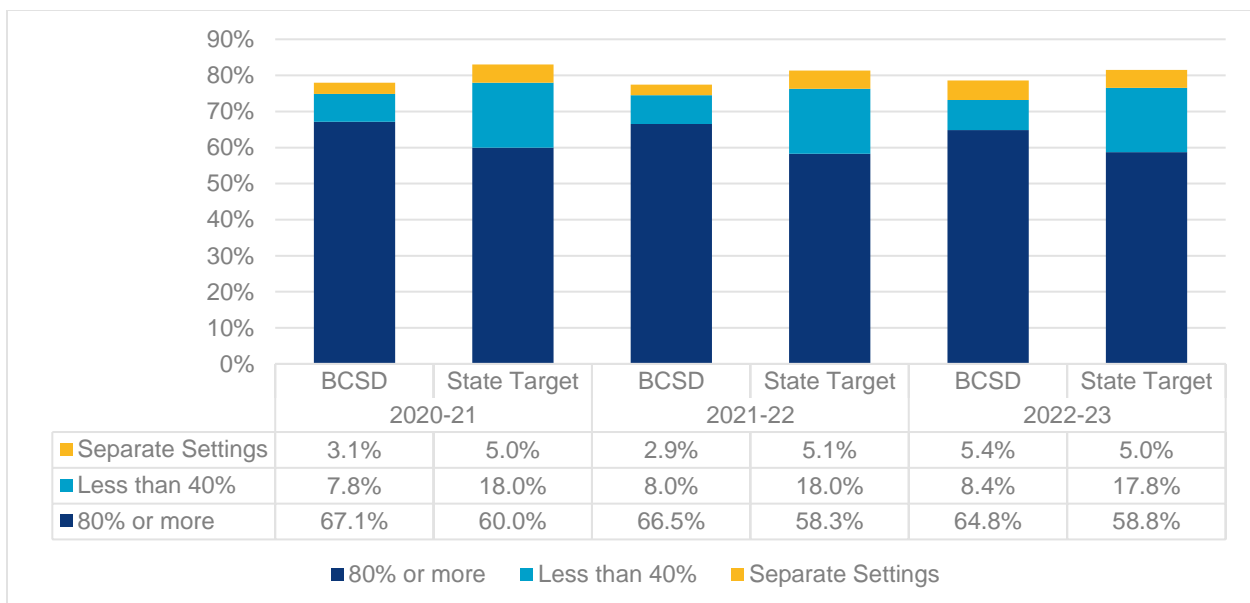
⁵¹ National data retrieved from National Center for Education Statistics Digest of Education Statistics:

<https://nces.ed.gov/programs/digest/>

⁵² State and District data retrieved from Special Education School District Data Profile available at: <http://data.nysed.gov/lists.php?type=district>. LRE data unavailable for 2019-20.

- **General Education Setting less than 40% of the time.** Since 2020-21, the percentage of students in this setting increased by 0.6 percentage points. BCSD met the state target for this setting for the past three years of data analyzed.
- **Separate Setting.** Since 2020-21, the percentage of students in this setting increased by 2.3 percentage points. BCSD met this state target for this setting during the 2020-21 and 2021-22 school years. In the most recent year of data (2022-23), BCSD landed just above the state target, with the percentage of students in a separate setting falling 0.4 percentage points above the state target. The percentage of students in a separate settings rose 2.5 percent from 2021-21, which presents a noticeable increase in the pattern observed over the past three years.

EXHIBIT 22. PERCENTAGE OF STUDENTS (AGES 5 IN K-21) BY EDUCATIONAL SETTING FOR BCSD & STATE SPP TARGETS, 2020-21 THROUGH 2022-23⁵³



Educational Setting by Primary Disability Area

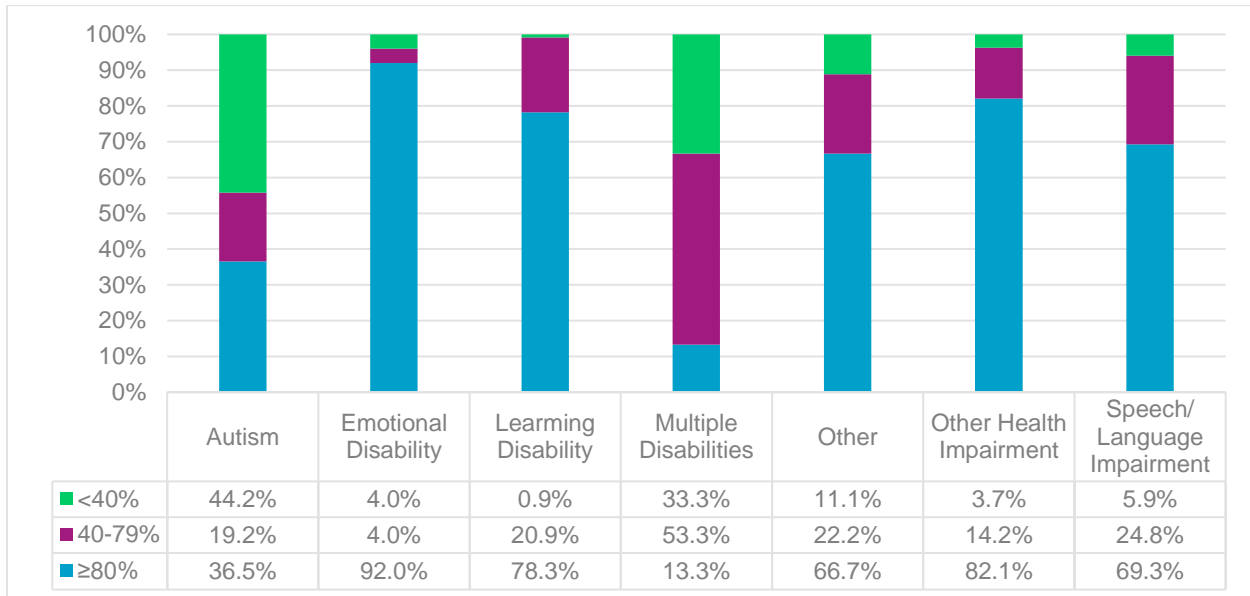
The chart below provides data on BCSD students by primary disability area and education setting. In 2023-24, of students receiving their education in the District, 72.9% of students with IEPs spent 80% or more of their day in the general education setting, 19.7% spent between 40-79% of their day in the general education setting and 7.4% spent less than 40% of their day in the general education setting.

- **General Education Setting 80% 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 72.9%: Emotional Disability (92%), Other Health Impairment (82.1%), and Learning Disability (78.3%).
- **General Education Setting between 79-40% of the time.** Students in the following categories spent time in the general education setting more frequently than the District average of 19.7%: Multiple Disabilities (53.3%), Speech and Language Impairment (24.8%), and Other (22.2%).

⁵³ Ibid.

- **General Education setting less than 40% of the time.** Students in the following categories spent time in the general education setting less than 40% of the time and at higher rates than the District average of 7.4%: Autism (44.2%) and Multiple Disabilities (33.3%).

EXHIBIT 23. PERCENTAGE OF BCSD STUDENTS (AGES 6-21) BY DISABILITY AREA AND EDUCATIONAL SETTING, 2023-24^{54 55}



A relatively small number of students with disabilities were suspended during the 2023-24 school year. In total, 21 students were suspended, mostly from high school. Four Black students, nine Hispanic students, two Asian students, and six White students were suspended.

OTHER MEASURES OF SUCCESS

The student survey, administered to BCSD students with IEPs in grades 8-12, offers valuable insights into their experiences and measures of success that go beyond traditional academic metrics. The results highlight areas where the District’s efforts are positively impacting students’ lives and fostering an inclusive environment that supports both academic and personal growth.

A notable 75% of student respondents with IEPs reported they consistently have opportunities to participate in after-school activities, such as clubs and sports. Of these, 61% said they “always” have this opportunity, while 14% reported having it “most of the time.” This level of access highlights BCSD’s commitment to supporting students with IEPs in fully engaging with the broader school community, enriching their educational experiences, and promoting a sense of belonging.

Teachers also play a pivotal role in helping students identify and leverage their strengths for learning. According to the survey, 61% of student respondents indicated that their teachers support them using a strengths-based approach “always” (33%) or “most of the time” (28%). This finding underscores the importance of individualized attention and strength-based teaching practices in fostering confidence and growth among students with IEPs.

The sense of community within BCSD schools also emerged as a strength. A welcoming and respectful school environment was perceived positively by 69% of student respondents, with 43 percent “always” feeling valued and 26% feeling this way “most of the time.” This demonstrates progress in creating school

⁵⁴ Data provided by BCSD in Fall 2024

⁵⁵ Note: Not all LRE settings from dataset represented; students in separate settings not included.

cultures that embrace inclusivity and respect for all students, contributing to a positive learning atmosphere.

Additionally, 64% of student respondents reported that their IEP goals effectively support their learning needs, with 17% stating they “always” feel this way and 47% agreeing “most of the time.” This suggests that many students see value in their individualized plans and recognize how their IEP goals align with their educational needs.

These findings reflect encouraging progress in areas critical to student success and well-being. While there is still room for improvement, particularly in making these positive experiences consistent for all students, the survey results provide a strong foundation for BCSD to build on as it continues to refine its practices and support systems for students with IEPs.

Student data also show positive trends for graduating students last school year. Post-secondary outcomes of students with disabilities who graduated in the 2023-2024SY represent another indicator of success. Of the 29 students who graduated in Spring 2024, 25 students (86%) were engaged in various post-secondary opportunities ranging from employment, pursuing a bachelor’s or associate degree, or attending a career education or trade school. The post-secondary outcomes for two of the 29 students could not be determined.

SUMMARY AND IMPLICATIONS

BCSD’s strong commitment to inclusive education has manifested in a high percentage of students with Individualized Education Programs (IEPs) spending 80% or more of their day in the general education setting. The District’s success is further highlighted by its graduation rate for students with disabilities, which surpasses that of students with disabilities across the state by 12 percentage points, and a dropout rate that was 3 percentage points lower than the state average for students with disabilities. However, given the small sample size, even one student dropping out can significantly impact the dropout rate in BCSD, which has risen to 5 percent since 2020—likely influenced by the COVID-19 pandemic. The District should examine the factors contributing to dropout and work to strengthen support systems that help students with disabilities stay engaged and on track for graduation. Data on the classification rate of students with disabilities shows that the rate is 2 percentage points lower than the state average, which does not raise explicit concerns about classification practices in the District at this time.

However, these positive indicators are tempered by persistent challenges in academic performance and equity. While the District has made notable progress in certain areas—such as the significant increase in Grade 8 ELA proficiency for students with disabilities, rising from 6% in 2021-22 to 26% in 2022-23, and the dramatic improvement in Grade 8 Math proficiency from 4% to 33% over the same period—achievement gaps remain a concern. For example, on statewide assessments in Grade 4 ELA, the proficiency rate for students with disabilities is 48 percentage points lower than that of their non-disabled peers in BCSD and 7 percentage points lower than the state average for students with disabilities. These disparities highlight that while inclusion and targeted improvements are yielding some success, they are not sufficient on their own to fully address and close longstanding achievement gaps.

Differences also exist in disability classifications among racial and ethnic groups, with Multi Racial students more likely to be identified with Multiple Disabilities, Asian students more likely to be identified with Autism, Black/African American students disproportionately classified with Emotional Disabilities, and Hispanic and ELL students having higher rates of Speech/Language Impairment classifications. A stark disparity also exists in the gender distribution of students with disabilities, with a much higher percentage of males than females classified. Disproportionate identification by race and gender may point to a need to strengthen Multi-Tiered Systems of Support in the District and examine and address the cultural beliefs and biases that may potentially impact the special education identification processes.

IV. LEARNING ENVIRONMENT AND SPECIALIZED SERVICES

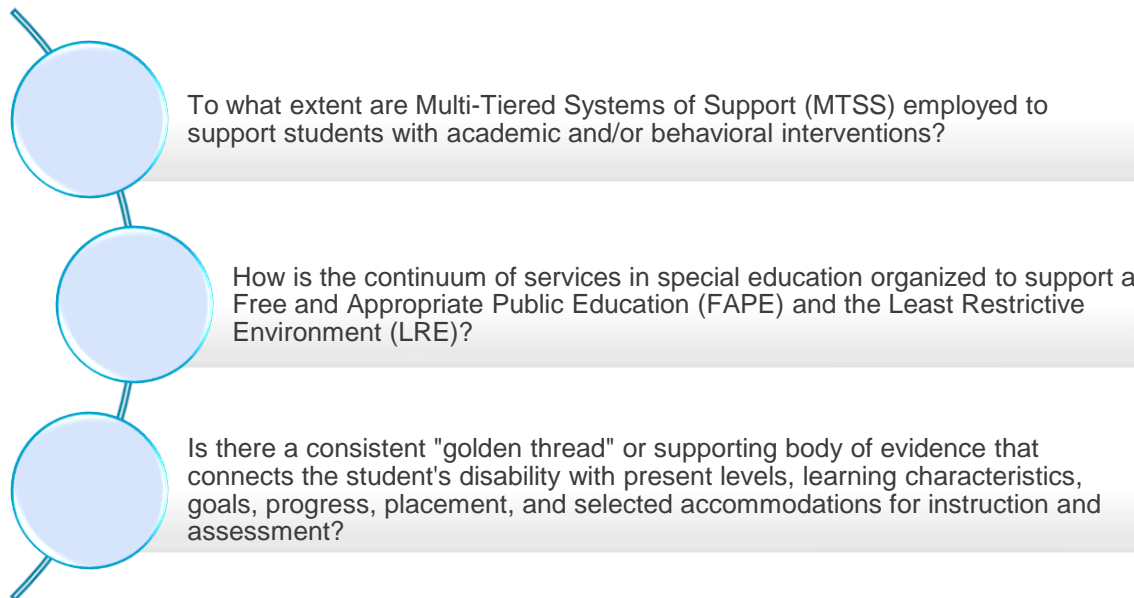
Overview

Within PCG’s Special Education Effectiveness Framework, Learning Environment and Specialized Services is one part of developing an effective special education system. High-performing special education systems deliver instruction and interventions within an inclusionary framework and with Individualized Education Program (IEP) fidelity. This leads to increased access and progress in grade-level learning standards and reduced disproportionality in special education.

The main components within this part of the framework include:

- Access to the General Curriculum and Multi-Tiered System of Supports (MTSS)
- Continuum of Services
- Individualized Education Program (IEP) Development
- Individualized Supports
- Coordinated Transition Activities

These five areas are key to developing a learning environment and specialized services that support students with disabilities in a meaningful and proactive way. PCG’s review of BCSD special education systems relative to this area of the framework explored the following research questions:



Below are the overarching strengths and opportunities within the Learning Environment and Specialized Services domain of the Special Education Effectiveness framework.

Strengths	Opportunities for Improvement
<ul style="list-style-type: none"> • Districtwide MTSS Framework. BCSD has prioritized expanding its approach from targeted strategies, such as UDL practices, to a comprehensive districtwide MTSS 	<ul style="list-style-type: none"> • Behavioral Supports within the MTSS Framework. The preliminary MTSS framework expansion has not explicitly addressed behavioral strategies or

<p>framework. This enhanced approach integrates academic, behavioral, and social-emotional supports within a cohesive system to better serve all students.</p> <ul style="list-style-type: none">• Staff Dedication and Skillset. Across all grade bands, most staff were passionate about their work and highly skilled.• Early Transition Planning. BCSD initiates career interest inventories for students starting at age 12, which is earlier than the state's recommended timeline of age 14.• Systems for Translation/Interpretation. BCSD has developed processes to support compliance with interpretation and translation services for parents whose first language is not English.• Assistive Technology (AT). BCSD has a variety of AT options to support students' access to the curriculum and includes these supports in students' IEPs.• Rigor of Instruction. Across all grade bands, staff held students to high expectations and rigorous coursework.• Hillside Alternative Campus. The Hillside Alternative Campus offered a safe, accessible environment for students, where instruction consistently reflected rigor and alignment with grade-level standards.• Accessibility Team. The creation of BCSD's Accessibility Team highlights the commitment to creating an inclusive community for all.• Processes and documentation. BCSD has an abundance of clear step-by-step documents that guide CSE, IEP, and Referral processes.	<p>interventions with comparable rigor to the academic foci.</p> <ul style="list-style-type: none">• Transition Planning. There is a disconnect between BCSD's programming for transition-aged students and their Transition Plans. Additionally, student survey data indicates that students often feel they are not adequately discussing or preparing for life after high school as part of the IEP process.• IEP Development. Inconsistencies were noted throughout IEPs reviewed with regards to quality IEP writing.• Progress Reports and Monitoring. A review of progress reports reveals a lack of objective data to understand how students are progressing toward their annual goals and support needed to establish progress monitoring guidelines for all staff.• English Language Learner Services and Dually Identified Students. Supports and services for dually identified students were not consistently aligned with best practices to optimize student outcomes.• Behavioral Supports and Programming at the Elementary Level. Limited programming supports exist for students with behavioral needs at the elementary level.• Support and Skills Class (SAS). Instruction and effective practices in SAS classes lacked consistency across classrooms.• Collaborative Teaching Structures. BCSD has not yet developed clear collaborative structures to optimize teachers' time for supporting inclusive educational services effectively.• Flex Week and Master Scheduling. Challenges with scheduling and effectively utilizing Flex Week for related service providers affect the delivery of services to students.• Expansion of the ICT Model into Elementary Schools. BCSD has developed
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	robust ICT programming for secondary programs. Elementary schools would greatly benefit from accessing an ICT model.
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MULTI-TIERED SYSTEMS OF SUPPORT

The provision of instruction and interventions to students within a framework of a Multi-Tiered System of Supports (MTSS) improves educational outcomes for all students, including those with Section 504 and IEP plans.⁵⁶ It is designed to be a general education initiative, and while special education can support this framework, it should not fall under the supervision of special education. The framework focuses on prevention and early identification of students who may benefit from instructional and behavioral interventions, as well as acceleration that removes barriers to learning.⁵⁷ When implemented as intended, MTSS leads to increased academic achievement by supporting rigorous core instruction, strategic/targeted interventions, and improved student behavior. Furthermore, this framework has been successfully used to support a reduction in disproportionate special education referrals of students based on race, gender, or ELL subgroups. The core characteristics that make up a strong MTSS framework include: 1) students receive high-quality, evidence-based instruction in their general education setting, 2) continuous monitoring of student performance, 3) all students are screened for academic and behavioral problems, and 4) multiple tiers of instruction are progressively more intense based on the student's response to intervention.⁵⁸

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 student’s needs, with regular observation to facilitate data-based instructional decision-making.”⁵⁹ MTSS provides an overall framework for structuring and coordinating the provision of high-quality core instruction. This includes additional behavioral support, such as behavior modifications or mental health support, which some students require to be 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 support, 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 core instruction that is provided in Tier 1.

District Practices

BCSD envisions supporting all students through a robust MTSS framework, grounded in a strengths-based, holistic approach. This vision supports that each student's unique needs are met with targeted, data-driven support. MTSS is a cornerstone of the BCSD 2024-2025 Success Plan Action Plan, which outlines a series of strategies and initiatives to advance the framework. Key goals in this plan include:

1. Establishing an organizational structure to guide MTSS development.
2. Creating clear lines of communication to engage all stakeholders in MTSS work.

⁵⁶ Council of the Great City Schools. (2012) *Common Core State Standards and Diverse Students*. <https://www.cgcs.org>

⁵⁷ Ibid.

⁵⁸ U.S. Department of Education, Office of Special Education Programs. (2011, January 21). *A response to intervention (RTI) process cannot be used to delay/deny an evaluation for eligibility under the Individuals with Disabilities Education Act (IDEA) (OSEP Memo 11-07)*. <https://sites.ed.gov/idea/idea-files/osep-memo-11-07-response-to-intervention-rti-memo/>

⁵⁹ Every Student Succeeds Act, Pub. L. No. 114-95, § 8101(33), 129 Stat. 1802 (2015).

3. Implementing and utilizing the MTSS, Assessment, and Analytics modules within Synergy to support decision-making.
4. Refining structures for conducting data-driven conversations across the district.
5. Expanding districtwide K-12 resources that promote academic, behavioral, and social-emotional success for all students.

These goals demonstrate the District's ongoing commitment to fostering inclusive, supportive learning environments that enable every student to learn and progress.

BCSD's investment in inclusive practices predates the current MTSS initiatives. The BCSD 2022-2023 Success Plan highlighted Universal Design for Learning (UDL) as a critical tool for creating inclusive classrooms. Under "Goal 1: Advance Active, Connected Learning," the plan emphasized strategies such as:⁶⁰

- Supporting inclusive learning environments where students feel connected, engaged, and have a sense of belonging, voice, and equitable access.
- Expanding the RULER approach to Social-Emotional Learning (SEL).
- Applying the AVID framework to build confidence, executive functioning, and relational skills.
- Advancing UDL and other inclusive practices.

Our analysis indicates that UDL has not been explicitly integrated into the current MTSS framework, despite the District's significant investments in the approach in the past. This has led some staff to perceive that UDL implementation has been deprioritized. While this perception may not reflect actual intent, as 55% of staff survey respondents agree BCSD has a solid understanding of UDL to support implementation, frequent leadership changes and shifting priorities likely contributed to this sentiment. The MTSS Core Leadership Team now has an opportunity to leverage the momentum from UDL's earlier successes by embedding its principles into the MTSS framework.

As part of the BCSD "2024-2025 Success Plan" it is the District's goal to "evolve the layers of academic, behavioral, and social-emotional support students."⁶¹ SMART goal #1 of the action plan prioritized "confirming and expanding information about existing districtwide K-12 continuum that supports academic and behavioral success and social emotional well-being for all students."⁶² BCSD is meeting the action steps and timelines associated with academic support. The second and third action steps, inventorying Tier 1 behavioral and social emotional practices in BCSD, were slated to begin in December 2024. The creation of documents "outlining current Tier 1 instruction in the areas of behavioral expectations and systems in place and current implementation of the RULER curriculum in each building" is expected in June 2025.⁶³ There was a notable absence of social emotional and behavioral support as part of Tier 1 practices in BCSD. The approach to inventory existing practices for understanding and implementation is a reasonable first step. It is recommended that BCSD continues to remain focused on the adoption of a

⁶⁰ BCSD 2022-2023SY Success Plan

⁶¹ BCSD 2024-2025SY Success Plan Action Plan

⁶² Ibid.

⁶³ Ibid.

robust MTSS framework grounded in academic, social emotional, and behavioral Tier 1 supports. A review of District documents revealed that, over the past two years, BCSD has made the development and implementation of an MTSS framework a key priority. The current Success Plan emphasizes “advancing MTSS to strengthen data-driven, inclusive systems to support all students academically, behaviorally, socially, and emotionally.” District leaders, staff, and the BCSD MTSS Core Leadership Team have embraced this initiative, establishing a clear vision and shared expectations for districtwide implementation. However, only 55% of staff survey respondents indicated that their school has a strong understanding of MTSS principles to support implementation. Notably, 63% of respondents believe their school uses Positive Behavior and Intervention Supports (PBIS) as part of MTSS. PBIS was not observed across schools during onsite visits, nor was it reflected in the MTSS documentation provided by the District. While this discrepancy suggests a need for clearer alignment and communication, it also indicates a positive trend in staff believing they are already implementing key practices associated with MTSS.

A central effort in building the MTSS framework was the creation of the MTSS Curriculum Council, which included approximately 40 staff members representing various roles within the District. This council collaborated to define the vision, priorities, and strategies for MTSS implementation. However, some gaps in stakeholder representation were noted: no special educators serving in self-contained settings participated in the MTSS Curriculum Council process. While it may not be obvious to include special educators serving in a self-contained setting in a general education initiative, their absence represents a missed opportunity. The District has positioned its MTSS framework as inclusive of all students, making comprehensive representation vital to its success.

- *55% of staff agree their school has a solid understanding of the principles of MTSS to support implementation across schools.*
- *63% of staff agree their school uses Positive Behavior and Intervention Supports (PBIS) to support student behavior as part of MTSS.*
- *55% of staff agree BCSD has a solid understanding of Universal Design for Learning (UDL) to support implementation across all levels.*

Staff Survey

all students.

- MTSS benefits every student when it aligns general and special education systems to provide targeted supports.
- Emphasizing standards-based instruction and focusing on student learning improves outcomes for all students.

Research underscores the importance of aligning MTSS to meet the needs of all learners, including students with significant cognitive disabilities. For instance, the National Center on Educational Outcomes (NCEO) and the TIES Center, in their brief “MTSS for All: Including Students with the Most Significant Cognitive Disabilities” (2020)⁶⁴, highlight several findings relevant to BCSD’s MTSS framework:

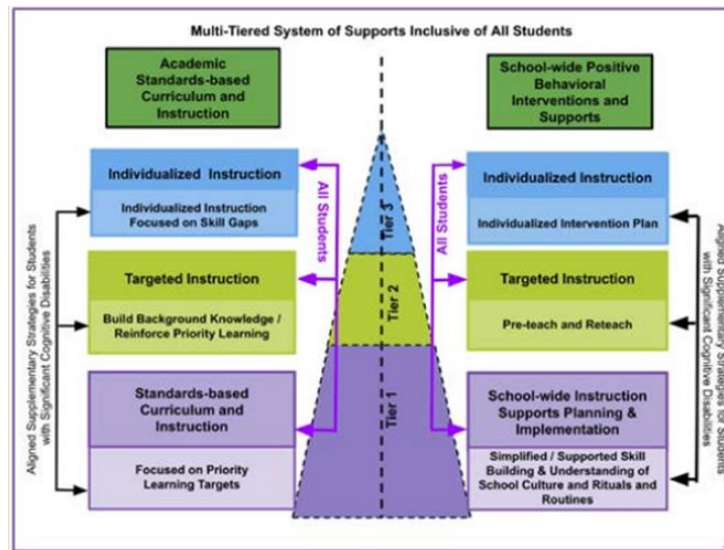
- General educators often face challenges implementing evidence-based strategies in the classroom without collaborative support from special educators. A joint effort is crucial to effectively deliver best practices.
- While students with significant cognitive disabilities require specially designed instruction, a robust MTSS framework supports addressing their academic and behavioral needs alongside those of

⁶⁴ The National Center on Educational Outcomes (NCE) and the TIES Center, January 2020

To illustrate the alignment of MTSS across academics, behavior, and social-emotional supports, the brief provides a tiered framework. This model highlights how general education, supplemental supports, and specialized strategies can be integrated to benefit all students, including those with significant cognitive disabilities.

The Exhibit below illustrates one way to align MTSS for academics and behavior/social emotional supports that recognizes the tiers of support for all students, as well as the aligned supplemental strategies inclusive of students with the most significant cognitive disabilities and other students in a school. The figure includes a tiered framework for a standards-based general education academic curriculum (the column immediately to the left of the triangle) and for behavioral and social emotional growth (the column immediately to the right of the triangle).

EXHIBIT 24. MTSS FRAMEWORK: ALIGNING ACADEMIC, BEHAVIORAL, AND SOCIAL EMOTIONAL INSTRUCTION AND INTERVENTIONS FOR STUDENTS WITH THE MOST SIGNIFICANT COGNITIVE DISABILITIES⁶⁵

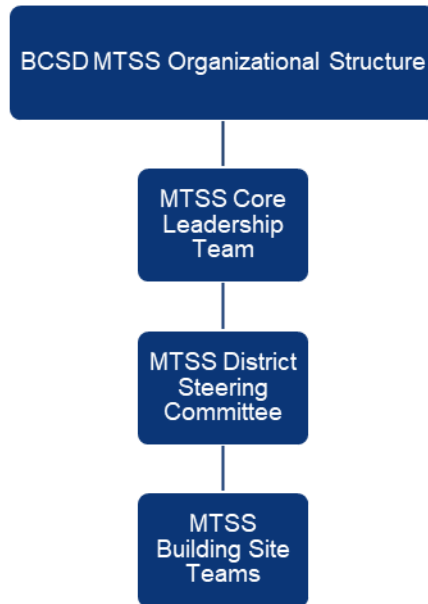


MTSS Structures

The MTSS Core Leadership Team functions as the systematic driver within BCSD’s organizational structure. All serving on this team also participates in the MTSS District Steering Committee, the mid-layer of the MTSS organizational structure responsible for communicating to MTSS Building Site Teams. Each layer within the MTSS organizational structure has clear roles and responsibilities as well as meeting and communication expectations.

⁶⁵ Ibid.

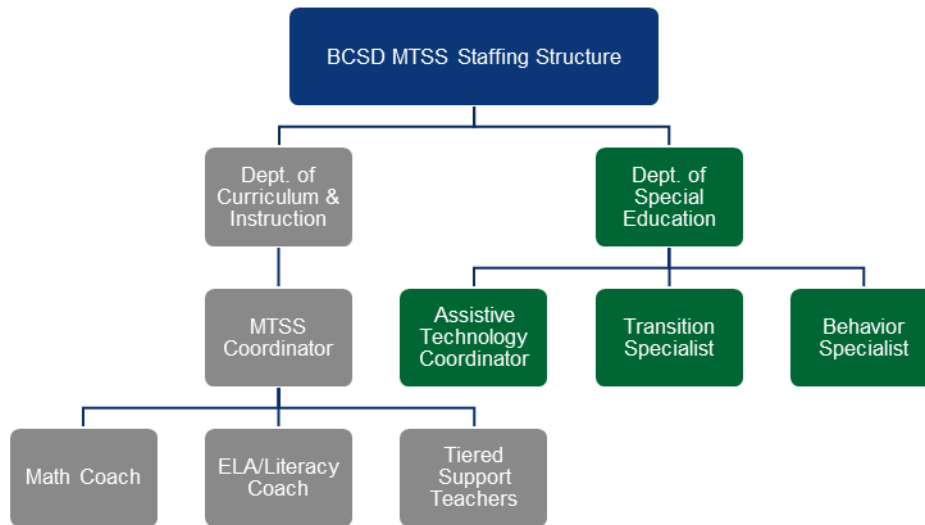
EXHIBIT 25. BCSD MTSS ORGANIZATIONAL STRUCTURE



BCSD's staffing structure to support MTSS implementation continues to evolve. Both Special Education and Curriculum and Instruction departments have demonstrated a shared commitment to MTSS through the creation of positions within each departmental structure. In Fall 2018, the Assistive Technology Coordinator, Universal Design for Learning (UDL) Coordinator, and Response to Intervention (RtI) Coordinator positions were established. A Transition Specialist and a Behavior Specialist were created within BCSD's Special Education department between 2019-2022. In June 2024, the UDL Coordinator and RtI Coordinator positions were eliminated from the District budget. The MTSS Coordinator, Math Coach, and Literacy Coach positions were established the following month (July 2024). In addition to the current coordinator and coach roles, BCSD employs a team of Tiered Support Teachers, who are general educators responsible for providing Tier 2 and 3 intervention support, at the elementary level.

This chapter further explores the integration of the MTSS organizational and staffing structures and processes across grade bands.

EXHIBIT 26. BCSD MTSS STAFFING STRUCTURE, 2024-25



Universal Screening Measures and Selection

The transition from vision to practice is a critical step in the successful implementation of an MTSS framework. BCSD has established a centralized Google Classroom that houses an abundance of resources, including Universal Screening tools, extensive Toolkits to support Literacy and Math interventionists, and links to websites designed to assist problem-solving teams across elementary, middle, and high school levels.

Sixty-nine percent of staff survey respondents agree that their schools design, provide, and assess the effectiveness of instruction and adjust service delivery using a data-based approach. This aligns with the District’s documentation, which provides clear guidance on the availability and selection of screening tools, accessible to staff through BCSD’s Google Classroom site. The District has implemented a universal screening process for students in

➤ *69% of staff agree in their school staff design, provide, and assess the effectiveness of instruction and adjust service delivery using a data-based approach.*

Staff Survey

Kindergarten through 8th grade, utilizing research-based tools such as Star Reading and Star Math assessments. These assessments, available in both English and Spanish, are administered as benchmarks multiple times throughout the school year. Students who struggle with the Star Reading practice questions are redirected to the Star Early Literacy screener for additional support.

In addition to Star assessments, students in grades 1 through 5 are screened three times per year using Bookworms: Renaissance Oral Reading Fluency CBM. Students who attend Mount Kisco complete the American Reading Company (ARC) Placement Screening, which aligns with the Bookworms curriculum. Protocols for selecting additional screening tools at the elementary level are housed in the Google Classroom site, providing staff with clear and accessible resources. For middle school students, a screening decision tree has been developed to help teams determine next steps and how to involve parents effectively. This comprehensive, data-driven approach demonstrates BCSD’s commitment to monitoring student progress and implementing appropriate interventions when needed.

The District has provided guidance on the interpretation of screener and assessment results for ELL students that is accessible in the Google Classroom site. Additional guidance published by the U.S. Department of Education (USDOE) that outlines the functional comparisons between language differences versus disability characteristics is highlighted in the District’s Google Classroom site.⁶² Additional USDOE English Learner Toolkit tools are linked in the Google Classroom for BCSD staff use.

MTSS Practices across Grade Bands

Each BCSD school houses a problem-solving team. The problem-solving team is charged with discussing individual student performance and flagging academic, social emotional, and/or behavioral concerns. The problem-solving teams have documented, standardized processes and protocols for the elementary, middle, and high school levels, including student engagement. These teams serve slightly different purposes at each grade band based upon the series of documents analyzed by PCG as part of this study.

BCSD has created a series of practices for MTSS implementation at elementary level. Tiered Support Teachers, often referred to as Interventionists, provide Literacy and Math intervention support across all five elementary schools. There are a total of 15 general educators serving in the Tiered Support Teacher role. Tiered Support Teachers work collaboratively with building teams to identify students for tiered interventions and to monitor student progress. Some study participants shared how this process is perceived to run parallel to CSE referral practices. There may be an opportunity for greater collaboration, at the building level, with special education or CSE staff to have an integrated, more seamless approach to serving students demonstrating academic, behavioral, or social-emotional delays. BCSD has two additional coaches. A Math coach provides integrated support to K-5 educators on the new general education Math curriculum, Bridges. The ELA/Literacy Coach supports the coordination and implementation of the new K-8 Bookworms Literacy curriculum, as well as all literacy curricula at the secondary level. While their role provides districtwide support, the current focus is on K-5, with the ability to support literacy initiatives across all grade levels as needed. It appears that the problem-solving teams run in tandem with the Teacher Resource Teams and Tiered Support Teacher intervention efforts at the elementary level.

Separate from the problem-solving teams, BCSD has established Teacher Resource Teams and Meetings designed to facilitate the exchange of ideas and strategies for students K-5. The primary goal of these meetings is to address a specific challenge identified by the initiating teacher, bringing together a collective group of educators to explore tools and strategies to support a student in the classroom. Notably, these meetings are not intended to serve as RTI problem-solving forums or to alter students' tiered levels of support. Rather, they provide a space for staff members to collaborate, provide support, share expertise, and offer actionable strategies that benefit both the teacher and student.

BCSD created a draft document titled, "Understanding Assessment and Layers of Support in K-5 Literacy." Assessment types, guidance, layers of support by intervention type (i.e., Bookworms, ARC, etc.) and by staff role are outlined in detail. While this guidance is in draft form, there is potential for streamlining elementary MTSS and intervention practices into one consistent document. It is important to note that PCG spent a considerable amount of time cross-referencing all documents provided and have summarized what appears to be the function and status of each elementary MTSS implementation structure within this report. The abundance of structures, and subsequent documents, were difficult to interpret for clarity. It is clear that BCSD leadership has prioritized and invested in supporting the academic outcomes for all students; however, based on our analysis these efforts appear to exist parallel to one another. When analyzing the different MTSS structures and staff roles, each function more as a stream of support rather than an integrated system.

Processes for MTSS problem solving teams are more clearly delineated at the middle school and high school levels. Fox Lane Middle School's (FLMS) problem solving processes outline the roles and responsibilities of each team member (i.e., student's teachers, the facilitator, the point person, etc.) along with working norms. In addition, problem solving team member(s) are provided guidance on how to engage students directly in the process prior to, during, and after the problem-solving meeting(s). Students requiring additional support at the middle school level can access a variety of tiered opportunities. Both the Literacy and Math supports offer a summary of the support, grading and scheduling options, as well as clear entrance and exit criteria. These are well-developed programs with

clear expectations that support a smooth transition from MTSS to a CSE referral, accompanied by extensive documentation on the student’s strengths and areas of need.

The chart below details the Literacy and Math support available to BCSD middle school students in detail, including program descriptions, scheduling, and entrance and exit criteria.

EXHIBIT 28. GENERAL EDUCATION SUPPORTS FOR STUDENTS AT FLMS, 2024-25

General Education Supports for Students at FLMS		
Literacy Support	Foundational Literacy Skills	Math Support Class
This is a Tier 2 option that provides students with supplemental support in a variety of literacy skill areas, including: phonics, fluency, vocabulary, comprehension and writing. The class typically includes time working independently on tailored i-Ready learning paths, time working individually or in small groups with an interventionist on specific targeted skills, and time working in whole group instruction around the aforementioned skills. In addition, students integrate the skills they learn in literacy support and apply them to their academic reading and writing assignments, enhancing their comprehension and composition abilities across various subjects	This is an every-day Tier 3 option that provides students with explicit, structured instruction in foundational literacy skills. The Wilson “Just Words” program serves as a core resource for this class. It is appropriate for students who would benefit most from intensive support in phonemic awareness, in-depth word study for decoding and spelling, and applying decoding skills to accurate word, phrase, and sentence reading.	This is a Tier 2 option that provides students with supplemental support in a variety of math skill areas based on assessed need, including: numbers and operations; algebra and algebraic thinking; measurement and data; and geometry. Students are assessed to see where they fall along the continuum of math skills and are placed on an independent learning path to master skills within that strand through self-paced choice board activities. Students are provided individualized instruction as they work toward mastery and set goals for their learning. There are times when the Math support teacher pushes in to support students in their math class to support the successful transfer of skills learned and practiced to the grade-level content coursework.
Grading: Students receive a pass/fail grade.		
Scheduling There are options for every-other-day or every-day support based on need.	Scheduling This class meets everyday.	Scheduling There are options for every-other-day or every-day support based on need.
Entrance Criteria <i>Incoming 6th Students</i> Recommended by elementary school for Tier 2 Literacy and/or Math. <i>7th/8th Grade Students</i> Based on universal screening, intervention data, and class grades Exit Criteria <ul style="list-style-type: none"> Based on universal screening and intervention data, above 55th percentile, or below based on other factors. Less than two years below grade level in the iReady diagnostic Conference with subject specific teacher 	Entrance Criteria - <i>Incoming 6th Students</i> <i>7th/8th Grade Students</i> Based on universal screening, intervention data, and Spelling subtests from the WJST Exit Criteria <ul style="list-style-type: none"> Successful completion of course or demonstration of mastery of course content as indicated by observational and assessment data. 	Entrance Criteria <i>Incoming 6th Students</i> Recommended by elementary school for Tier 2 Literacy and/or Math. <i>7th/8th Grade Students</i> Based on universal screening, intervention data, and class grades Exit Criteria <ul style="list-style-type: none"> Based on universal screening and intervention data, above 55th percentile, or below based on other factors. Conference with their Mathematics teacher.

BCSD’s high school has adopted the PRISM model, defined as, “a problem-solving structure through which to prioritize student need, develop a plan, and outline next steps, with the goal that this process helps prevent academic failure.”⁶⁶ Similar to the FLMS problem-solving team approach, roles and responsibilities, working norms, and processes are well-documented. A wide range of supports are available for students in the MTSS (PRISM) model for high school students. The table below is a summary of supports that can be accessed by high school students:

EXHIBIT 27. SUMMARY OF SUPPORTS THAT CAN BE ACCESSED BY HIGH SCHOOL STUDENTS

Support Type	Details	Placement/Access
Outside of Class Supports (Grades 9-12)	Study Lab (Grades 9-10), Office Hours, After School Help, Writing Center, Counseling Consult	Assigned based on availability or need
AVID Elective (Grades 9-12)	Targets motivated students with potential for postsecondary success, focusing on students who may lack access to college-related resources	Application based on academic potential and motivation

⁶⁶ PRISM Guiding Document (internal to BCSD) provided to PCG, 2024

Academic Support Center (Grades 9-12)	Tier 1 intervention support, small class size, (10 students), for Gen Ed, 504s, or IEP students needing general assignment support	Step between Study Lab and Bridges, supported by Teaching Assistants
Bridges (Grades 9-12)	Tier 2 support for Gen Ed students, small class size (up to 15), targeted academic and executive function support	Assigned via PRISM or 9 th grade articulation
9th Grade Team	Team structure for Gen Ed students struggling academically or with SEL, organizational, or attendance challenges	Identified Gen Ed students in need of team support
10th Grade Team	Continuation of 9 th Grade Team Support for additional or returning students	Recommended from the 9 th Grade Team or identified later
Keys to Emotional Awareness (Grades 9-12)	Support for students with significant emotional and academic needs, available for Gen Ed and IEP students	Flexible enrollment through PRISM of Annual Review
Hillside	Therapeutic support program in a smaller environment for students struggling academically, emotionally, or socially	Voluntary selection for students needing therapeutic support

The Exhibit below is the document the District developed for their staff to refer to in making determinations for the various levels of student support offered at the high school. This is summarized in the table above for readers.

EXHIBIT 29. GENERAL EDUCATION SUPPORTS FOR STUDENTS AT FLHS, 2024-25

Outside of Class Supports Grades 9-12	AVID Elective Grades 9-12 AVID One Pager	Academic Support Center Grades 9-12 ASC One Pager	Bridges Grades 9-12 Bridges One Pager
<p>Study Lab—students (grades 9 and 10) with free periods are assigned a study lab where they have time to work independently on assignments</p> <p>Office Hours—scheduled during-school help for students struggling academically in a class</p> <p>After School Help—scheduled after-school help for students struggling academically in a class(es)</p> <p>Writing Center—students sign up for help with writing assignment as needed</p> <p>Counseling Consult—Clinician scheduled to meet with student as needed</p>	<p>Students achieve average or above academically; maintain at least a C average</p> <p>Demonstrate potential for acceptance into and success in postsecondary education</p> <p>Motivated and eager to achieve</p> <p>Show potential to become, or already are, active, positive member of school community</p> <p>May come from family where parents do not have college education or do not possess access to resources about the college process</p>	<p>Tier 1 intervention support—step between Study Lab and Bridges</p> <p>Overseen by IAs with class size of approximately 10, comprised of Gen Ed students and students with 504s or IEPs</p> <p>Quiet, focused space for students to receive general support with assignments</p>	<p>Tier 2 academic support for Gen Ed students (some exceptions made for students with IEPs) in a small class setting of up to 15 students</p> <p>Targeted academic and executive function support</p> <p>Bridges teacher collaborates closely with teachers, guidance, administration, and parents about student progress</p> <p>Students placed through PRISM or entering 9th grade articulation</p>
9th Grade Team Grade 9 9th Grade Team One Pager	10th Grade Team	Keys to Emotional Awareness Grades 9-12 KEA One Pager	Hillside
<p>Gen Ed students who are non-ELLs who are capable of higher performance than previous grades demonstrate, and struggled academically</p> <p>Demonstrated need for SEL support of a team structure</p> <p>Low schoolwork and homework completion and/or frequent tardies and absences</p> <p>Underdeveloped study skills</p> <p>Weakness in organization and/or time management (may have a 504 indicating need for support in these areas)</p>	<p>Students recommended from the 9th grade team</p> <p>Additional students who weren't in 9th grade team</p>	<p>Students demonstrating emotional needs that are significant enough to result in academic impact</p> <p>Require both emotional support and academic support</p> <p>Available for Gen Ed students and students with IEPs</p> <p>Fluid enrollment (can be assigned via Annual Review)</p>	<p>Therapeutic Support Program component</p> <p>Students who need a smaller environment</p> <p>Students select to attend</p> <p>Students may be struggling academically, emotionally, and/or socially</p>
Prevention, Response, Intervention, Support, Monitoring			

Implementation of MTSS Framework between Buildings and Data Management Practices

The pivot of BCSD's priorities, as evidenced in BCSD's Success Plans, has led to partial implementation of critical inclusive learning environment objectives, such as the districtwide adoption of UDL and PBIS. Analysis of study data gathered suggests that while the shift to MTSS as a framework was quick, it was intentional to integrate practices rather than remaining reliant on individual teams driving this important work. It was acknowledged by some study participants as a necessary shift for the District to build self-sustaining Tier 1 intervention structures and supports. This pivot to an MTSS framework has prioritized building long term capacity of all BCSD staff.

The consistency of MTSS implementation across buildings in BCSD continues to evolve. Our review of documents, as previously noted, was difficult to interpret particularly at the elementary level. This sentiment was echoed by study participants in both focus group and survey data. Multiple Tier 1 intervention teams with similar areas of focus should be integrated to address time-sensitive student needs with the most appropriate course of action. The concerted efforts led by BCSD leadership should be celebrated while continuing to refine expectations for consistency in MTSS implementation.

Scheduling challenges remain a barrier for all students receiving services in BCSD. The shortened instructional day was noted as an inherent challenge by several study participants. For context, the high school schedule begins at 7:45AM and ends at 2:14PM which equates to a 6.5-hour instructional day. Due to bus transitions, the elementary school day runs from 9:00AM to 3:00PM, equating to an approximate 6-hour instructional day. It was reported that a 6-hour instructional day in elementary school is slightly lower than surrounding districts. Anecdotally, a 6-hour elementary instructional day would reflect a lower end of average timeframe when comparing to national data. However, BCSD does meet the required number of instructional days and hours as outlined by New York State regulations for both elementary and secondary programming. The District is currently partnered with a national subject matter expert in school scheduling to provide support to BCSD District and building leaders in navigating scheduling complexities.

The six-hour instructional day, particularly at the elementary level, has created scheduling challenges, as reported by BCSD staff. To accommodate student needs without taking away from core instruction, staff reported they have developed schedule workarounds, including a co-treatment models in some cases where multiple providers collaborate to deliver services at the same time when possible. This approach was described as a way to make the most of limited instructional time while still addressing students' academic, behavioral, and therapeutic needs. Co-serving models can be effective when they are conducted in an intentional and meaningful way, which will be discussed later in this report. However, scheduling challenges, such as student and provider availability, were reported to impact the feasibility of implementing a co-serving model with fidelity. Some study participants acknowledged feeling stressed when having to decide which non legally mandated service should be prioritized due to scheduling complexities. An extended instructional day is a long-term investment that is not currently being recommended as a result of this study. Rather, these findings acknowledge the impact of schedule challenges on service provision and how to appropriately address competing priorities. BCSD is well-positioned to leverage the expertise of its current scheduling partnership to help navigate these challenges for staff.

The Master schedule design for all grade bands remains fluid to maximize access to Tier 1 instruction and remedial skill intervention. At the elementary level, I-block is designated to provide students with necessary services without causing them to miss new whole-class instruction. Similar efforts are being made at middle school and high school to rework the Master Schedule and maximize service provision. It is important to acknowledge that thoughtful planning is underway; however, the six hour instructional day will likely have some sort of impact.

BCSD staff utilize the Synergy MTSS module to log performance, data gathering, planning, and progress monitoring for individual (student) RTI plans. The Assessment Module, also in the Synergy SIS System, houses Bridges math assessment data with expansion plans to build an infrastructure to house all classroom data. Universal screening data for students in Kindergarten through 8th grade automatically feeds into Synergy. By leveraging Synergy, the District has streamlined the organization and storage of student intervention plans, allowing for efficient management and accessibility for all staff involved.

Transitioning from Intervention to a Special Education Referral

The transition to a special education (CSE) referral from tiered intervention support varies according to study participants. BCSD staff were surveyed to determine their perspectives on the transition from intervention to referral. Based upon survey results, 69% of staff believe every attempt is made to meet a student's needs through general education interventions before a student is referred for special education. Most BCSD staff, approximately 71%, self-report fully understanding the steps and timelines associated with referral process for special education. The level of agreement dropped substantially to 44% when asked if fellow staff in school(s) fully understood the steps and timelines associated with the special education referral process. No intervention guidance documents reviewed as part of this study mandated that a student must participate in interventions prior to a special education referral.

Mandatory participation in MTSS or other intervention practices cannot prevent the referral of a student suspected of having disability as outlined in the IDEA.⁶⁷ Local education agencies are encouraged to create complementary school-wide intervention practices in addition to adhering to federally mandated special education referral guidance. The District offers robust academic, Tier 1 intervention support and has prioritized standardizing intervention implementation practices. The timeframe for intervention implementation should be informed by several factors, including individualized student need; however, there was minimal consensus from study participants on the approximate timeframe(s) a student receives intervention support. It was anecdotally reported that some students received intervention support for years prior to entering middle and high school. English language acquisition was reported to likely increase the amount of time a student would receive intervention support before transitioning to a special education (CSE) referral, if needed. Monitoring processes, such as utilizing the Synergy module, should be considered as an outcome of this study.

Monitoring student progress is essential in determining which students require a referral to determine eligibility for special education and/or related services. If, at times, a referral is contingent upon progress in MTSS, it is essential that all BCSD staff are fluent in determining how best to support struggling students. Study participants echoed this need for clarity. Establishing consistency across campuses will also allow for a more robust system of referring students not making progress within Tier 3 instruction to determine their eligibility for special education and related services. In addition, the transition of students from MTSS service provision to referral and special education eligibility determination must be refined to support student success.

REFERRAL AND ELIGIBILITY PROCESSES

According to NY State regulations, upon receipt of a request for a referral, the District is bound to a 10-school day response timeline to either:⁶⁸

⁶⁷ The Department has provided guidance regarding the use of RTI in the identification of specific learning disabilities in its letters to: Zirkel - 3-6-07, 8-15-07, 4-8-08, and 12-11-08; Clarke - 5-28-08; and Copenhaver - 10-19-07. Guidance related to the use of RTI for children ages 3 through 5 was provided in the letter to Brekken - 6-2-10. These letters can be found at <http://www2.ed.gov/policy/speced/guid/idea/index.html>.

⁶⁸ New York State Education Department. (2024). *Section 200.4 Procedures for Referral, Evaluation, IEP Development, Placement and Review*. <https://www.nysed.gov/special-education/section-2004-procedures-referral-evaluation-iep-development-placement-and-review#:~:text=A%20student%20suspected%20of%20having%20a%20disability%20shall,for%20an%20individual%20evaluation%20and%20determination%20of%20eligibility>

- (a) request parent consent to initiate the evaluation; or
- (b) provide the parent with a copy of such request for referral; and
 - a. inform the parent of his or right to refer the student for an initial evaluation for special education programs and/or services, and
 - b. offer the parent the opportunity to meet to discuss the request for referral and, as appropriate, the availability of appropriate general education support services for the student, with the building administrator or other designee of the school district authorized to make a referral pursuant to paragraph (1) of this subdivision, and the party making the request for referral if a professional staff member of the school district. Upon request of the parent or school district, any other person making a request for referral shall have the opportunity to attend such meeting.

Once parental consent has been obtained for a referral for an evaluation, evaluations shall be initiated by a committee on special education, which is to be completed within 60 days of receipt of consent unless extended by mutual agreement of the student's parents and the CSE.

If a student is identified as having a disability following initial evaluations, the CSE will recommend appropriate special education programs and services to the board of education. These services must be arranged and provided to the student within 60 school days of receiving consent to evaluate.

- 52% of staff agree BCSD has formal and accessible guidelines regarding their special education processes for staff.
- 40% of staff agree there is no delay in the process when a student is referred for special education services.
- 69% of staff agree IEP teams understand how to use data to appropriately classify or declassify students for special education services.

Staff Survey

If a student is deemed ineligible for special education, the recommendation must explain the reasons for this determination. If the CSE determines that a student who has been receiving special education services no longer requires them and can transition to a full-time general education program, the recommendation must: (a) specify any declassification support services to be provided to the student and/or their teachers, and (b) include details on the start date, frequency, and duration of these services, which cannot extend beyond one year after the student transitions to the general education program.⁶⁹

District Practices

BCSD provided several detailed documents that clearly outlined step-by-step instructions on the initial special education referral process. Our analysis of several documents provided by BCSD demonstrate the District's commitment to establishing

comprehensive standards for staff and maintaining fidelity

to state guidelines. The "Initial Referral Processes" document, created by BCSD, guides staff members on required District actions, such as referral acknowledgement, the process of initial meetings, IEP Direct processes, timeline tracking, etc. The "CSE Referral Packet Items and Responsibilities" outlined specific referral packet items (ex: RTI Data for Intervention Goals, Language Acquisition Grid for ESOL students, Running Record), the responsibility of staff members designated to each item, and any notes or related documents. The process for record keeping and informing CSE team members was explicitly stated in detail for BCSD staff. Two additional documents were thoroughly analyzed regarding re-evaluation

⁶⁹ New York State Education Department. (2024). *Section 200.4 Procedures for Referral, Evaluation, IEP Development, Placement and Review*. <https://www.nysed.gov/special-education/section-2004-procedures-referral-evaluation-iep-development-placement-and-review#:~:text=A%20student%20suspected%20of%20having%20a%20disability%20shall,for%20an%20individual%20evaluation%20and%20determination%20of%20eligibili>

procedures at the elementary and secondary levels. Both documents provided comprehensive and clear guidance on the re-evaluation process, specifying designated staff members, detailed procedures, and timeframes to maintain fidelity in implementation.

EXHIBIT 28. BCSD INITIAL REFERRAL PROCESSES

INITIAL REFERRAL PROCESSES

Initial Parent Referral Received

- Parent Referral - take all of their information and ask them to send a formal request in writing to the school principal and copy the coordinator on the letter.
- Email school principal and coordinator giving them a heads-up that you received the call.
- Within 10 days of receipt of the referral letter, the principal and school psychologist will meet with the parent and determine if the referral will move forward at this time.
- Principal contacts Director or Asst. Director to let them know if the referral will move forward.

School Building Referrals

- Full hard copy packet of referral is sent to CO
- Director or Asst. Director will review the referral to determine if more information is needed or if the referral can move forward.

Next Steps for Parent and Building Referrals

- Coordinator will let office staff know what evaluations we need consent for.
- At this point we don't do anything until the consent from the parent has been received.
- When consent is received from the parent, enter consent in IEP Direct and inform the chairperson of the 45 day and 60 day compliance dates.
- Chairperson will select a meeting date.
- Chairperson will assign the team CSE participants.
- Send the three-page CSE Referral Form to the school psychologist
- Secondary: Reach out to Assistant Principal for a general education teacher
- Mail the meeting notice to the parents. Email the meeting agenda to the team, principal, secretary and others as necessary. When sending the agenda via e-mail, mention to all when the evaluations are due to us. Ask that they send all RTI and physicals to us by evaluation due date as well.
- Set-up the meeting folder with attendance sheet, change of attendees sheet, and copies of the evaluations.
- Be sure there is a physical received. If not, contact school nurse or parent. Meeting can not be held without a physical.

Process of Initial Meetings

- All initial meetings will take place on Thursdays at CO.
- Schedule the meetings on the Google calendar for chairperson

IEP Direct Processes

- Click-on New Student
- Type in complete last name, then select the student from the pop-up box
- Select Create a Draft
- Select the correct year – probably select “No” for the other selections
- Create Draft
- Committee Recommendations, School year, Enter correct start date and end date for the year.
- Save and Return
- Give IEP access to the team

Process Tracking

- Select *Receipt of Referral (PWN)*
- Enter date the referral was accepted (not date you received the referral)
- Track Item – No

Although BCSD has well-documented procedures, both survey and focus group data noted discrepancies in the referral process within and across the District. More than half of BCSD survey respondents, 52%, agree the District has formal and accessible guidelines regarding special education processes for staff. Staff survey respondents shared lower levels of agreement when asked if peers (staff) fully understand the application of special education processes to English Language Learners (ELLs).

Notably, some BCSD study participants perceived a delay in referrals for ELL students. A risk ratio analysis of BCSD data revealed that Hispanic students are more than twice as likely to be identified as having a Speech/Language impairment when compared to their peers of other racial/ethnic groups. This disability classification trend is consistent with national data trends for ELL students eligible for special education and related services.⁷⁰ The perception of under-identification of ELL students may stem from a misunderstanding or misapplication of MTSS within the general education setting or language acquisition for ELL students. A nuanced approach to special education referral determination for ELL students is necessary and is one that involves comprehensive data collection and analysis to guarantee students receive the most appropriate services tailored to their specific needs in the general education setting before considering a special education referral.

- 35% of staff agree staff in their school(s) fully understand the identification process for students that are English Language Learners and how that may impact eligibility determinations.
- 34% of staff agree services for English Language Learner students with disabilities at their school(s) are meeting student needs.

Staff Survey

One theme that emerged from our qualitative data analysis is the perception that the number of parent referrals for special education have increased, and that eligibility is dependent upon a parent's level of advocacy. This is further complicated by perceptions that certain referrals are prioritized or deprioritized and that the prioritization for inclusion is contingent upon advocacy efforts. Referral trends were not analyzed in detail to determine if the overall number of parent referrals has increased. However, the analysis of special education documents reviewed as part of this study does not support the prioritization of referrals or that inclusive practices efforts are spearheaded by parents alone as this is a clear District priority as well.

Overall, our data show BCSD consistently met compliance for making appropriate and timely referrals for students recommended for special education services.

DEVELOPMENT OF INDIVIDUALIZED EDUCATION PROGRAMS (IEP)

An Individual Education Program (IEP) creates an opportunity for teachers, parents, school administrators, related services personnel, and students (when appropriate) to work together to improve educational results for children with disabilities. The IEP is the foundation of a quality education for students with disabilities. An IEP supports teams with implementing specially designed instruction, accommodations, and modifications to allow students with disabilities to access the curriculum and make meaningful progress. IEPs are a key component of an effective special education system.

Using the Golden Thread framework, PCG randomly selected and reviewed approximately twenty-five student IEP files to assess the overall quality and content of IEPs developed by BCSD. Samples were pulled from a variety of LRE settings and represented demographics comparable to the population of students with IEPs in BCSD. The reviews and analyses were conducted through the PCG file review

⁷⁰ English Learners with or at Risk for Disabilities", Institute of Education Sciences, 2021. Retrieved from: [https://ies.ed.gov/blogs/research/post/english-learners-with-or-at-risk-for-disabilities#:~:text=English%20learners%20\(ELs\)%20are%20the,disabilities%20and%20speech%2Flanguage%20impairment.](https://ies.ed.gov/blogs/research/post/english-learners-with-or-at-risk-for-disabilities#:~:text=English%20learners%20(ELs)%20are%20the,disabilities%20and%20speech%2Flanguage%20impairment.)

protocol, which is aligned with our Golden Thread Framework. More information about the Golden Thread Framework and the indicators used for the evaluation can be found in the Appendix.

A narrative summary of the IEPs reviewed is included below:

Evaluations

Strengths
<ul style="list-style-type: none">• A variety of assessments were used for evaluations that aligned to suspected areas of disability.• Most evaluation reports had clear explanations of assessment results and interpretation of scores so all team members could understand the results.• Bilingual evaluations were comprehensive and accounted for a student's cultural background when interpreting results in the report.
Opportunities
<ul style="list-style-type: none">• Some evaluations did not have a clear link identifying how the student's disability impacted their access to the curriculum.• Many evaluations had limited parent input, including the student's history, parent rating scales, or student rating scales, if the student was old enough to complete a self-assessment.• Some reports did not provide information regarding how the student was progressing in the general education setting or on grade-level standards in the student's current performance (e.g., grades, interventions, etc.).• Some evaluations had inconsistencies in reports compared to what was stated in the IEP related to disability classifications.

Present Levels of Academic and Functional Performance (PLAAFPs)

Strengths
<ul style="list-style-type: none">• There was clear evidence of input from all team members in most IEPs indicating a collaborative approach.• Transition assessments and interest inventories were conducted for students of transition age and reflected in IEPs.• Some IEPs included detailed data on student strengths in the dual-language program and reported progress in both English and Spanish language acquisition.
Opportunities
<ul style="list-style-type: none">• Not all IEPs reviewed included parent input that was detailed and comprehensive.• Transition goals were not consistently measurable or aligned with IEP goals per NYSED guidelines.• Most PLAAFP statements did not interpret data in relation to grade- or age-appropriate academic and/or functional skills and utilized anecdotal data instead of measurable data.• Some IEPs did not align PLAAFP statements with IEP goals. It was unclear how PLAAFP data informed the development of IEP goals.• For dually identified students, ESOL teacher input was not always included in the IEP to connect how language acquisition impacted disability-related needs.

Measurable Annual Goals

Strengths

- Most IEPs included goals aligned to academic standards, reflecting efforts to maintain curriculum alignment.
- All IEPs reviewed included details about how progress would be monitored and the frequency of monitoring.

Opportunities

- Many goals were not written in SMART (Specific, Measurable, Achievable, Relevant, Timebound) format, often missing baseline data (Specific and Measurable) and timeframes for achievement (Timebound).
- It was not consistently clear which grade level the IEP goals were aligned to, particularly for students performing significantly below grade level.
- In some IEPs, discrepancies existed between students' present levels of performance and the annual goals, making alignment unclear.

Accommodations, Modifications, and Special Considerations

Strengths

- All reviewed IEPs included explicit accommodations and modifications tailored to students' disability-related needs.
- Accommodations and modifications in IEPs were appropriately aligned with state standards for classroom, state, and districtwide assessments.
- IEPs included clear examples of Assistive Technology (AT) supports, such as text-to-speech, speech-to-text, word processing programs, pencil grips, and flexible seating.
- Accommodations and modification were closely aligned with the individualized needs of students as outlined in their IEPs.

Opportunities

- Some IEPs did not provide specific details on how Augmentative and Alternative Communication (AAC) tools would be implemented to support student instruction and communication.
- Few IEPs lacked a clear rationale for paraprofessional support, particularly for students performing at or near grade level.

Services and Placement

Strengths

- All IEPs reviewed provided evidence that IEP goals drive service delivery options, showing alignment between identified needs and the services provided.

Opportunities

- Many IEPs lacked a clear or explicit rationale for the selected Least Restrictive Environment (LRE), and in cases where students were removed from general education, the "Not Applicable" option was frequently selected instead of providing a justification for the removal.

- Justification statements, when present, were frequently vague and lacked specific details about why removal was necessary.

Progress Reports

Strengths

- All files reviewed had progress report statements and were updated for all reporting periods.
- Progress reports were written in jargon-free, parent friendly language and had ratings for student progress toward goals.

Opportunities

- Most progress reports did not provide objective data on student progress related to IEP goals.
- Progress reports did not appear to be personalized for each student's progress toward their IEP goals.
- Progress reports that did include written explanations were often one sentence or included limited data to support how the student was progressing towards their IEP goals.

IEP Development and Monitoring

The development of IEPs is a cornerstone in providing students with disabilities a free and appropriate public education (FAPE). High-quality IEPs that are both compliant with legal requirements and individualized to meet each student's unique needs are essential to fostering academic achievement and meaningful progress. However, the process of IEP development and implementation must go beyond compliance; it requires ongoing monitoring to maintain ambitious, achievable goals that are appropriately aligned with the student's present levels of performance. Continuous oversight is critical to maintaining the dual focus on compliance and quality, allowing IEPs to function as dynamic tools for student success.

Currently, BCSD does not perform systematic audits of IEPs for quality. However, the Director and Assistant Director of Special Education review IEPs for initial evaluations and reevaluations to maintain compliance. To support staff in developing IEPs that meet all requirements, the District provides a dedicated IEP Training website. This site includes an Annotated IEP Guide and breaks down key elements of the IEP into components to facilitate training and understanding. These resources align with those typically observed in similar districts for IEP development, giving staff a guide to reference.

In addition to compliance checks on initials and reevaluations, BCSD has established a comprehensive approach to monitoring IEP implementation and student progress, also detailed on the staff IEP Training website. The website offers clear guidance on completing all aspects of the IEP, conducting IEP (CSE) meetings, and preparing progress reports. Case Managers play a central role in this process, with responsibilities that include overseeing the completion of progress reports by the appropriate service providers and submitting a checklist of completed reports to Central Office. Related service providers are also expected to monitor progress and complete progress reports in alignment with each student's IEP goals.

Additionally, BCSD has a protocol for translating progress reports into families' first languages, to support accessibility for families/caregivers whose first language is not English. During focus groups, some participants expressed concerns about IEP documents not being translated, while others noted that the District has recently made a more concerted effort to provide parents with IEP documents in their first language.

BCSD has a system for monitoring student progress throughout the year using a variety of assessments and screeners. A detailed schedule is provided for staff, outlining when these assessments should be administered during the school year. At the elementary level, the BCSD employs a range of assessments, including STAR 360, Bookworms, the Heggerty Assessment, Bridges, Fry word lists, and Foundations. These tools are used to benchmark student progress, inform instructional decision-making, and identify students who are not meeting grade-level benchmarks, including students with disabilities. BCSD's transparency in this process is exemplified by the resources it provides to parents, including information on its website explaining how to interpret STAR 360 score reports along with a FAQ document for STAR screening that is also available on the District's website.

While there is a clear process for monitoring student progress throughout the year using a variety of benchmark assessments, these scores were often not written into the IEPs reviewed so it was not always clear how students were progressing toward grade level standards.

Given these established practices, there is an opportunity for BCSD to enhance oversight by implementing more comprehensive auditing procedures for IEP quality. Systematic IEP audits would allow BCSD to monitor the consistency and effectiveness of IEPs more thoroughly and identify areas requiring targeted professional development. This additional layer of review would further strengthen BCSD's commitment to maintaining high standards for IEP development and implementation.

By combining a structured approach with the current resources and exploring ways to bolster oversight, BCSD can monitor compliance, quality, and effectiveness in IEP practices. These efforts help IEPs remain powerful tools for supporting students' growth and achievement.

Evaluations

BCSD's practices for evaluating students with disabilities reveal both notable strengths and opportunities for improvement, as evidenced by a comprehensive analysis of data from focus groups, interviews, surveys, and student file reviews. One of the District's key strengths lies in its use of a variety of assessment tools during evaluations. This fosters a broad and thorough understanding of student needs

- *73% of staff agree that before a student is referred for a special education, every attempt is made to meet the student's needs through general education interventions.*
- *71% of staff agree they fully understand the steps and timelines associated with the referral process for special education.*
- *44% of staff agree that staff in their school fully understand the steps and timelines associated with the special education referral process.*

Staff Survey

when determining eligibility for special education and related services. Most evaluation reports clearly explain assessment results in ways that are accessible to all team members, fostering collaboration and informed decision-making. BCSD also demonstrates a strong commitment to equity through its bilingual evaluations, which account for students' cultural backgrounds when interpreting results. These practices reflect a thoughtful approach to meeting the diverse needs of the student population.

To support staff in conducting evaluations, the District has implemented several initiatives, particularly for English Language Learners (ELLs). Training on the latest version of the Woodcock Munoz Language Screener (WMLS-III) has equipped staff with updated skills and clear guidelines for the evaluation process, including expected timelines for completing evaluations once students are referred. Additionally, a Q&A session on NYSED guidance for dually identified students and the development of a Language Acquisition Grid have provided valuable resources for staff. The grid, in particular, outlines benchmarks for language development based on the length of time a student has been in the United States, helping staff distinguish between language acquisition challenges and disabilities. NYSED also has an ELL Eligibility flowchart to help teams in making determinations for dually identified students.⁷¹ These efforts have been complemented by the creation of an optional ELL study group formed by BCSD, which supports educators in identifying language-based needs versus disability-related concerns.

- *68% of staff agree the results of special education evaluations are shared with them in ways that provide meaningful insights into students' education needs.*
- *76% of staff agree that special education evaluations are sufficiently comprehensive to identify students' specific strengths and needs.*
- *35% of staff agree that staff in their school fully understand the identification process for students that are English Language Learners (ELL) and how that may impact eligibility determinations.*

Staff Survey

Despite these strengths, challenges have been identified in BCSD's evaluation practices. One area of concern is the lack of a clear connection between evaluation results and students' disability-related needs in some reports, which can hinder the alignment of services with individual needs. Additionally, many evaluation reports fail to provide sufficient detail about students' performance in the general education setting or their educational history, limiting the contextual understanding necessary for interpreting results.

A more specific issue involves inconsistencies in disability classifications across a few student records. When reviewing evaluation reports and IEPs, we found a few cases where a student's prior classification, such as Speech and Language Impairment, had been changed to Other Health Impairment (OHI) without a clear rationale in the documentation. In these instances, parent and teacher rating scales did not align, and BASC-3 scores were mostly in the average or mildly elevated range which would not indicate a disability is present. These rating scale scores were also not referenced in the IEP, and there were no corresponding diagnoses to substantiate the OHI determination in the documentation reviewed. While these classification changes may reflect team decisions made during the CSE meeting, providing clearer documentation in evaluation reports and the IEP could strengthen consistency and transparency in eligibility determinations.

For students with Learning Disabilities (LD), the connection between assessment data, classroom performance, and eligibility determinations was not always clearly documented in the files reviewed. The District's required packet for LD determinations, used for all students in initial eligibility meetings, is a

⁷¹ New York State Education Department. (2015). *English Language Learners (ELLs) Screening, Identification, Placement, Review, and Exit Criteria*. <https://www.nysed.gov/sites/default/files/bilingual/ellidchartrev.pdf>

strength and reflects best practices in making SLD determinations. However, while this structured process is in place, the corresponding data was not always clearly documented in evaluation reports or consistently reflected in students' IEPs. Additionally, in some cases, classroom data conflicted with evaluation findings. For example, one student was found eligible for an LD in writing, yet feedback from the classroom teacher indicated the student could write complete sentences, raising questions about how different data sources were synthesized in the eligibility determination process. These inconsistencies suggest the need for a clearer "golden thread" in documentation, aligning evaluation data, classroom performance, and eligibility decisions in a well-articulated manner.

Survey data further illuminate these challenges, particularly regarding staff perceptions of the evaluation process. While 73% of staff survey respondents agreed that all possible interventions are attempted before a student is referred for a special education evaluation, only 40% believed there was no delay in the evaluation process once a referral was made. Staff survey respondents expressed confidence in their individual understanding of evaluation steps and timelines (71%), but only 44% felt their colleagues within the same building shared this knowledge. Although many staff survey respondents felt that evaluations were comprehensive (76%) and helpful (68%), there was notably lower confidence in processes for identifying disabilities in ELL students, with only 35% of staff survey respondents agreeing they understood how to navigate this aspect of the evaluation process. The analysis of study findings related to evaluating ELL students to determine eligibility for special education services mirrors similar feedback acknowledged when implementing MTSS processes for ELL students.

BCSD has taken steps to address challenges in conducting bilingual evaluations through a partnership with BOCES, which helps manage evaluation demands when internal capacity is exceeded. The District has two bilingual SLP evaluators who conduct assessments in-house whenever possible; however, there is no bilingual school psychologist or special education teacher available to complete bilingual evaluations. As a result, BOCES is utilized to support compliance with timelines. While focus group participants raised concerns about delays in receiving results and inconsistent quality in BOCES evaluations, our IEP record review did not substantiate these concerns. Additionally, participants highlighted the need for more training in language dominance assessments and additional testing kits to support the growing demand for bilingual evaluations. However, given the current lack of bilingual staff to conduct these evaluations outside of SLPs, maintaining the partnership with BOCES remains a practical solution at this time.

PCG's analysis shows BCSD has made strides in strengthening its evaluation practices, particularly through culturally responsive approaches, staff training, and the provision of targeted resources for ELL evaluations. However, challenges such as inconsistencies in IEP documentation, the need for stronger alignment between evaluation findings and student needs, and delays in bilingual evaluations present opportunities for further improvement. Addressing these areas will enhance the District's ability to deliver equitable, accurate, and timely evaluations for all students with disabilities.

Independent Education Evaluations (IEE)

Independent Educational Evaluations (IEEs) serve a critical purpose within the special education process, offering parents the opportunity to seek an external evaluation when they disagree with the District's evaluation of their child at the District's expense. Federal guidance under the IDEA⁷² and corresponding guidance from the NYSED⁷³ specify that an IEE may be requested after the District has conducted all evaluations in the area of suspected disability and the parent disagrees with the evaluations. In such cases, the District must provide parents with a clear process for obtaining an IEE, including a letter explaining how to select an approved provider and access evaluations at the District's expense. During the 2023-2024 school year, BCSD received nine IEE requests. Based on the information reviewed, PCG

⁷² IDEA. (2017). *Sec. 300.502 Independent education evaluation*. <https://sites.ed.gov/idea/regs/b/e/300.502>

⁷³ New York State Education Department. (2024). *Part B procedural safeguards notice*. <https://www.nysed.gov/sites/default/files/programs/special-education/procedural-safeguards-notice-english.pdf>

could not determine which evaluations these nine parents disagreed with, but our analysis shows BCSD has adhered to state and federal requirements by sending approval letters to parents informing them of their rights and how they can obtain an IEE with an approved provider at the District's expense.

BCSD provides parents with NYSED's Special Education Procedural Safeguards, which includes information on the Independent Educational Evaluation (IEE) process. According to the District, they do not deny evaluations and follow established procedures for determining when an evaluation is warranted. However, some parents in focus groups expressed concerns that their requests for initial evaluations were not acted upon because the District did not suspect the child had a disability based on their current performance, leading parents to seek private evaluations at their own expense. In some instances, these private evaluations resulted in their child being classified for special education services, which left parents feeling frustrated that the time it took to obtain a private evaluation may have contributed to gaps in their child's learning and progress.

It is important to distinguish between an Independent Educational Evaluation (IEE) and a private evaluation initiated by parents. An IEE is requested when a parent disagrees with a district-conducted evaluation and, under IDEA, may be funded by the District if certain criteria are met. In contrast, a private evaluation is obtained by a parent at their own expense when the District has not yet conducted an evaluation or when a parent seeks additional assessment outside the District's process.

In these cases, the District is not required to fund the private evaluation but retains the right to conduct its own assessments and may choose to consider the results of a private evaluation as part of the eligibility determination process. These are distinct processes under IDEA regulations, though some parents in focus groups referred to private evaluations as IEEs, which can lead to confusion about BCSD's obligations regarding funding and consideration of evaluation results.

BCSD must continue to comply with IDEA's evaluation requirements and determine the need for an initial evaluation based on a review of available data and input from both the District and parents. If interventions are considered before an evaluation, this decision must be made collaboratively. Clear communication and transparency regarding the evaluation process are essential in helping families understand their rights and the District's procedures. By continuing to uphold federal and state regulations, proactively responding to parental concerns, and strengthening collaboration with families, BCSD can reinforce its commitment to conducting thorough and equitable evaluations that appropriately identify and support students with disabilities.

Present Levels of Academic Achievement and Performance (PLAAP)

For the PLAAP portion of the IEP review, several strengths and opportunities for growth were noted. Across many IEPs, there is clear evidence of input from all team members, demonstrating a collaborative approach to planning. However, in some cases, parent input is less robust, highlighting an area for improvement in engaging families more thoroughly in IEP development. Transition

assessments and interest inventories are evident for students of transition age, a positive practice aligned with guidelines from the NYSED. Yet, for some IEPs, transition goals are not measurable or aligned with

- *83% of staff agree they have been invited to participate in IEP meetings.*
- *82% of staff agree their school teams know how to conduct IEP meetings to incorporate all voices (e.g., students, caregivers, and school-based staff) to develop comprehensive IEPs.*

Staff Survey

other goals in the IEP, which is inconsistent with NYSED's emphasis on writing measurable and relevant transition goals to support students' post-secondary aspirations.⁷⁴

Survey data supports these observations, with 83% of staff survey respondents reporting they are invited to IEP meetings and 82% agreeing that school teams effectively incorporate all voices—including those of students, caregivers, and staff—when developing individualized and comprehensive IEPs. Nonetheless, only 69% of staff survey respondents feel confident that IEP teams understand how to use data to appropriately classify or declassify students for special education services, indicating a need for professional development in this area. While many staff believe they know how to use data when classifying and declassifying students, there were some instances where student data showed students were at grade level, yet goals and objectives were still developed for that content area. While this was not noted across all IEPs reviewed, it is something for the District to consider in training staff to on data-based decision making when developing IEPs.

For students in the dual-language program, PLAAFP statements shows that while some IEPs include detailed data on students' strengths, reporting progress in both English and Spanish, data is not consistently reported based on grade or age-appropriate academic and functional skills. This was the same for students who were not enrolled in the dual-language program. In some cases, the data in the PLAAFP did not align with the goals and objectives, and anecdotal information is used instead of objective, measurable data. This aligns with focus group feedback in which parents believe that data is often reported in anecdotal ways, as opposed to objective data that allowed for parents to understand where their child is functioning in relation to grade-level standards. Furthermore, scores from formal and standardized assessments are not always interpreted to clarify the impact of the student's disability or their standing relative to grade-level standards. For ELL students, there is evidence that ESOL teachers attended IEP meetings; however, their input regarding the students' language needs and the impact of their disabilities is not always reflected in the IEPs.

These findings highlight areas of strength, such as team collaboration and dual-language reporting, and opportunities to enhance data interpretation, alignment of goals, and meaningful family and ESOL teacher involvement in the development of PLAAFP statements.

⁷⁴ New York State Education Department Office of Special Education. (2017). *Transition Planning and Services for Students with Disabilities*. <https://www.nysed.gov/sites/default/files/programs/special-education/transition-planning-and-services-for-students-with-disabilities.pdf>

Measurable Annual Goals

The annual goals section of an IEP is essential for guiding instruction, monitoring progress, and maintaining accountability for student outcomes. Effective goals must be rigorous, individualized, and aligned with the core curriculum to support students' access to grade-level standards while maximizing their potential. Survey data indicates that 85% of staff survey respondents report they understand their students' IEPs and how to implement them as written. However, only 68% of staff survey respondents agree that IEP goals are consistently rigorous and aligned to the core curriculum, highlighting an opportunity for improvement in developing goals that meet SMART (Specific, Measurable, Achievable, Relevant, and Timebound) goal standards and are aligned to grade-level standards.

- *85% of staff agree they understand their students' IEPs and are confident in implementing them as written.*
- *68% of staff agree that IEP goals are rigorous and aligned to core curriculum*
- *84% of staff agree that IEPs are developed to meet compliance standards, maximize students' time in general education, and have data-driven goals that support progress monitoring.*
- *72% of staff agree that student progress toward IEP goals is analyzed and discussed regularly by teachers and related service providers.*

Staff Survey

A review of IEPs reveals a mix of strengths and areas needing attention for goal writing. Many IEPs included standards-based goals, reflecting efforts to align with curriculum expectations. However, it was not always clear which grade level the standards were based on, particularly for students working far below grade-level expectations. In some cases, discrepancies emerged between the students' present levels of performance and the goals written, making it difficult to determine how the goals addressed the students' unique academic needs. For example, some goals related to foundational skills, such as sight word recognition, lacked specificity about the grade level of the words, leaving the

targets ambiguous and limiting their effectiveness for measuring progress.

Our review also found that many goals were not written in SMART format. The most common omissions were baseline data to make goals specific and measurable and timeframes to indicate when the goals were expected to be achieved. These missing elements make it challenging to maintain accountability and evaluate whether goals are appropriate and achievable. Despite this, 84% of staff survey respondents agree that IEPs generally meet compliance standards, maximize students' time in general education, and include data-driven goals that support progress monitoring.

Furthermore, the process of monitoring and discussing progress toward IEP goals varies. While 72% of staff survey respondents report that student progress toward IEP goals is analyzed and discussed regularly, this leaves room for improvement in fostering consistent communication and collaboration among teachers and related service providers. Encouraging more frequent and structured discussions about progress could help keep goals relevant and allow for necessary adjustments to support student growth.

A positive finding was that all reviewed IEPs included information about how progress would be monitored and the frequency of data collection, reflecting a clear commitment to tracking student growth over time. These findings suggest an opportunity for BCSD to enhance professional development and provide targeted support for writing measurable goals. By maintaining consistently SMART goals that are clearly aligned to grade-level standards and informed by accurate baseline data, BCSD can empower its educators to create high-quality IEP goals that drive meaningful progress and improve outcomes for students with disabilities.

Accommodations, Modifications and Special Considerations

Accommodations, modifications, and special considerations were identified as considerable strengths in BCSD's IEPs. Survey data shows that 73% of staff survey respondents feel confident in identifying appropriate accommodations and modifications to enable students to access grade-level content. Additionally, 82% agree that special education services, accommodations, and modifications outlined in students' IEPs are consistently implemented as written. However, focus group feedback revealed a slightly different perspective, with some participants expressing concerns about inconsistent implementation of accommodations and the inclusion of excessive accommodations in some IEPs, which they felt created challenges for effective implementation. Documentation analysis, on the other hand, indicated that all reviewed IEPs included explicit accommodations and modifications tailored to students' disability-related needs and aligned with state requirements for classroom, state, and districtwide assessments. Onsite visits mirrored the mixed feedback, with some classrooms showing strong evidence of accommodations and modifications being effectively implemented, while others showed little, or no evidence of such supports being provided. Given the District's focus on inclusive practices, it is critical for all staff, including general education teachers, to be able to provide accommodations and modifications for students with IEPs.

Assistive Technology (AT) and Augmentative and Alternative Communication (AAC) were also identified as areas of strength. Survey data indicates that 77% of staff survey respondents agree students have access to and are utilizing AT and/or AAC to access the curriculum as required by their IEPs. This aligns with findings from the IEP review, which highlighted numerous examples of AT being effectively integrated into instructional supports in IEPs. Examples included text-to-speech software, speech-to-text tools, word processing programs, pencil grips, and flexible seating. However, our review also identified an area for improvement in the use of AAC. While some IEPs listed AAC as a support, details on how and to what degree these tools would be used to support student instruction were often missing. Onsite observations, however, showed positive examples of students effectively utilizing AAC to access the curriculum and communicate with peers and staff, demonstrating the potential for impactful use of these supports when implemented with clarity and consistency.

Paraprofessional support emerged as another area of opportunity. In some IEPs, the rationale for paraprofessional support was unclear, particularly for students performing at or near grade level. For instance, one IEP reviewed detailed a 17-year-old student receiving paraprofessional support for academics despite evidence of strong academic performance both in the classroom and on standardized assessments. This raises concerns about the potential for overreliance on paraprofessional support, which research has shown can hinder the development of student independence and self-reliance. Onsite visits provided further insights, with some paraprofessionals being utilized effectively to support students in meaningful ways, such as focusing on instructional tasks and promoting student engagement. In contrast, other classrooms showed signs of overreliance, with several adults providing support that did not appear to be fully necessary based on student needs.

- *73% of staff agree that staff in their school understand how to identify appropriate accommodations and modifications to allow students to access grade-level content.*
- *82% of staff agree the special education services, accommodations, and/or modifications identified in students' IEPs are implemented as written.*
- *77% of staff agree that students have access to and are utilizing assistive technology (AT) and/or Augmentative and Alternative Communication (AAC) to access the curriculum if this is required as part of their IEP.*

Staff Survey

Overall, BCSD demonstrates strong practices in developing and implementing accommodations, modifications, and special considerations that align with students' needs and support their access to education. Addressing areas of opportunity, such as explicitly detailing AAC supports in IEPs and refining the use of paraprofessional supports, will further enhance the quality and impact of the services provided.

Services and Placement

Our review of IEPs highlighted both strengths and opportunities in how Least Restrictive Environment (LRE) decisions are documented and justified. A significant strength observed was that all reviewed IEPs demonstrated a clear connection between IEP goals and the service delivery options outlined for students.

This alignment underscores BCSD's commitment to providing services that are directly tied to the unique needs and goals of each student.

- *74% of staff agree that students with IEPs receive instruction and services in general education classes to the maximum extent possible.*
- *68% of staff believe that IEP teams discuss instructional supports and services in general education classes when making recommendations for students with disabilities.*

Staff Survey

However, an area of opportunity lies in the documentation and justification of LRE decisions, particularly when students are removed from the general education setting. In many of the IEPs reviewed, the section requiring a rationale for removal from the general education setting was marked as "Not Applicable", even though the student was removed from the general education setting. In cases where a justification statement was provided, the language was often vague and lacked specific details. For example, statements such as "student

will participate in Special Class for language arts and math" did not offer a clear explanation of why the student required removal from the general education environment for these subjects. This lack of specificity can hinder understanding and transparency regarding the decision-making process for LRE placements.

Survey data reflects mixed perceptions among staff regarding the implementation of inclusive practices. Approximately 74% of respondents agree that students with IEPs receive instruction and services in general education classes to the maximum extent possible. Additionally, 68% of staff believe that IEP teams actively discuss instructional supports and services in general education classes when making recommendations for students with disabilities. While these findings indicate general support for inclusive practices, they also highlight an opportunity to strengthen the consistency and clarity of how these discussions are reflected in IEP documentation.

To enhance LRE documentation, BCSD should focus on providing explicit, individualized rationales for removal from general education settings, grounding these justifications in data and the student's unique needs. Doing so will align with best practices and further support transparency and collaboration among IEP team members when placement decisions are made.

Progress Reports

Progress reporting on students' IEP goals emerged as an area with strengths and opportunities for improvement. A significant strength was that all reviewed files included progress reports for each reporting period, demonstrating adherence to reporting timelines. Additionally, progress reports were consistently written in parent-friendly, jargon-free language and included ratings for student progress toward goals, making them accessible and understandable for families.

However, there were several areas where progress reports could be enhanced to better reflect individualized student progress. Most progress reports lacked objective data directly tied to IEP goals, which is critical for accurately monitoring and communicating student progress. Reports often appeared generalized rather than personalized, failing to provide specific insights into each student's progress.

When written explanations were included, they were frequently brief—often just one sentence—and lacked substantive data to support the assessment of progress.

Based on staff survey responses, communication between general education and special education teachers, as well as between special education teachers and paraprofessionals, was identified as an additional area of need. Limited collaboration in these areas may contribute to the inconsistencies and lack of detail observed in progress reports. Improved collaboration between staff supporting students with IEPs could enhance the quality of progress monitoring and lead to progress reports that provide a more comprehensive and accurate picture of student growth. By focusing on incorporating more objective and detailed data in progress reports and enhancing collaboration among educators and support staff, BCSD has an opportunity to strengthen its approach to progress monitoring and communication with families. This will allow progress reports to serve as effective tools for informing instructional decisions and supporting student success.

Parent Perceptions on IEP Development

Parent perceptions of IEP development, gathered through focus groups and open-ended survey responses, revealed a mix of concerns and suggestions for improvement. While survey data indicated that 89% of parents reported receiving all necessary special education documents prior to IEP meetings, focus group participants shared a different perspective. Some parents noted that they did not receive draft IEPs unless they actively advocated for them, leaving them feeling unprepared for meetings and uncertain about the process or what to expect. This discrepancy highlights potential inconsistencies in communication and practices across schools.

One area of concern was the lack of clarity and rigor in goal development. A small subset of parents expressed concerns that the same goals were repeated across IEPs and that when students did not meet their goals, the response was often to lower expectations and criteria rather than reassess and refining the approach. This was particularly noted for parents of students fully included in the general education setting, as they felt this practice diminished expectations for their children. These parents also felt that the District appeared to lack expertise in addressing specific areas of need, such as executive functioning deficits, leaving families feeling their child was not fully supported in these areas. Although our IEP review did not confirm this, we felt it was important to include as it was a recurring concern raised by parents in focus groups and open-ended survey responses.

Progress monitoring and data collection were other areas of concern, with parents describing the process as anecdotal and lacking clear evidence of student progress over time. They reported receiving limited feedback on their children's progress, including vague updates that did not provide actionable insights. This aligned with our findings in reviewing progress reports as well and is an area of opportunity for the District. Many parents expressed a desire for more detailed information about what their children were working on in school, including curriculum details and current performance levels. Some parents believe this will help them better support their child's learning at home and maintain alignment with their IEP goals.

Communication and translation services were another theme that emerged. While survey data showed that 100% of parents who required translated IEPs received them, 86% felt that interpretation services helped them understand CSE meeting discussions, focus group feedback indicated persistent challenges in this area. Parents noted that interpreters often lacked training in special education terminology, which limited their ability to effectively translate IEPs and meeting discussions. Additionally, several parents stated they did not automatically receive IEPs in the mail and had to request them, further complicating their engagement in the process. While other parents reported they had not received translated IEPs until last year.

Similarly, a small subset of parents raised concerns about the implementation of IEPs, emphasizing that plans often seemed strong on paper but lacked effective follow-through in high-quality instructional

practices. They highlighted gaps in communication and awareness among general education teachers regarding accommodations and goals. While these parents felt teachers were responsive once contacted, they believed that stronger initial communication and training could lead to better implementation from the start of the school year, allowing students to succeed without delays or repeated reminders.

These insights reflect parents' desire for a more collaborative, transparent, and rigorous IEP development process. While these concerns will be discussed in greater detail in the Family and Community Engagement chapter, they underscore parents' desires for improved communication, personalized goal development, and enhanced implementation of IEPs to better meet the needs of students with disabilities.

Exit Summaries and Support for Declassified Students

BCSD has established clear protocols for managing the processes related to declassifying students from special education services and preparing Student Exit Summaries for students exiting special education upon graduation or aging out of eligibility. While both processes involve the conclusion of special education services, they differ significantly in purpose and execution, reflecting the unique circumstances of each scenario.

Declassifying Students

Declassifying a student occurs when the IEP team determines that the student no longer qualifies for special education services based on data and evaluation results. This process is grounded in the principle that eligibility is contingent upon the presence of a disability that meets a set of predetermined criteria, and a student requires specially designed instruction to access and make progress in the general education curriculum. An essential component of declassification is the use of comprehensive data to support this decision and clarity in student progress monitoring moving forward.

BCSD has well-defined administrative protocols for managing compliance with declassification procedures. Student progress monitoring following declassification is no longer within the purview of the Special Education department. General education student progress, including declassified students, is monitored through both formal and informal assessments, including BCSD's benchmark and screening measures. Declassified students are eligible to receive services through BCSD's MTSS framework of tiered support via academic, social emotional, and behavioral interventions. Students can be re-referred for a special education evaluation at any time.

This study's research questions included an analysis of declassification trends across the years within BCSD. Due to the District's size and the small population of student data analyzed related to declassification rates, prevalence by grade is not reported. A narrative summary of declassification rates in BCSD during 2021-2022SY through 2023-2024SY is as follows:

EXHIBIT 29. DECLASSIFIED STUDENTS FROM SY2021-22 THROUGH SY2023-2024

School Year	Total Declassified Students	Declassified # Receiving 504 Plan	Declassified % with 504 Support	Revocation of Consent for Services
2021-2022	24	6	25%	1
2022-2023	20	3	15%	0
2023-2024	28	4	14%	0
Total (3 years)	72	13	18%	1

The analysis of BCSD's practices revealed no themes indicating procedural noncompliance or improper decision-making when determining whether students continue to qualify for special education services.

District staff appear to be appropriately calibrating student needs and progress to determine levels of support. Further analysis of eligibility data supports this finding. The percentage of students eligible for special education and related services in BCSD has demonstrated a slight increase over the past five years. This rate increase aligns with national averages and falls slightly below the state average by only a few percentage points.

Exit Summaries

In contrast, the Student Exit Summary process is required when a student exits special education due to graduating with a regular high school diploma or aging out of eligibility for FAPE under state law. This process is designed to prepare students for life beyond school and document the supports and services that contributed to their educational success.

BCSD's process for completing Student Exit Summaries is comprehensive and well-supported by clear guidelines for staff. Three key documents—the Student Exit Summary Checklist, the Student Exit Summary Model Form, and the Student Exit Summary Guidance Form—guide staff through the process. Additionally, BCSD provides explicit instructions regarding the appropriate team members to involve in the Exit Summary meeting, which may include the student, parents, guidance counselor, transition specialist, social worker, and school psychologist, depending on the student's needs.

The student's Exit Summary is formally documented using either the Post-Secondary Student Exit Summary Form (SES) or the Skills and Achievement Exit Form (SACC) in the District's Frontline system. BCSD monitors these Exit Summaries for compliance and reports no issues with completing them for students preparing to graduate or age out of special education. Our analysis confirms that BCSD's processes are comprehensive, providing compliance and a clear roadmap for staff to follow.

BCSD's protocols for declassifying students and preparing Exit Summaries reflect a strong commitment to procedural compliance and support for students' transitions. While declassification emphasizes the ongoing evaluation of a student's needs within the general education setting, Exit Summaries focus on equipping students with the documentation and resources necessary for post-secondary success. These clear and consistent practices demonstrate BCSD's dedication to meeting both legal requirements and the individual needs of students as they transition out of special education services.

Grade-Level Transition, Transition Planning, and Post-Secondary Outcomes

Transitions in education play a critical role in supporting students with disabilities as they move through different phases of their academic journey and beyond. Grade-level transitions, such as advancing from elementary to middle school or middle to high school, focus on preparing students for shifts in academic expectations, social environments, and school structures. In contrast, post-secondary transition planning emphasizes equipping students with the skills, knowledge, and resources needed to achieve their goals after high school, whether that involves college, career, or independent living. Both types of transitions require careful planning, collaboration, and individualized support to help students successfully navigate these pivotal moments and achieve long-term success. This section will explore how the District approaches these transitions and planning, highlighting strengths and identifying areas for growth.

Grade Level Transitions

Parent survey responses reveal that 63% of families believe that transitions between grades or schools for students with disabilities in BCSD are seamless. However, staff survey responses present a different perspective, with only 40% agreeing that these transitions are smooth. This disparity suggests a disconnect between parent perceptions and staff experiences. While many parents feel the process meets expectations, staff—who are directly responsible for implementing these transitions—identify challenges that may not always be visible to families.

➤ *40% of staff agree that students with disabilities transitions between grades/schools in BCSD is seamless.*

Staff Survey

BCSD has established a comprehensive articulation process to support transitions between grade spans, particularly from elementary to middle school and from middle to high school. This process includes collaboration among building administrators, school counselors, teachers, clinicians, special education administrators, and Learning Specialists. To further support families, BCSD hosts an annual Transition Night in February, where families meet with administrators and coordinators to review services, supports, and scheduling considerations for students transitioning from 5th to 6th grade and from 8th to 9th grade. Despite these efforts, feedback suggests that the purpose and use of these processes are not always fully understood or consistently applied by staff, and not all parents are aware of Transition Night or feel similarly supported when transitioning grades within the same school building, where a formal plan may be lacking.

Among parents who reported concerns, common themes included staff not thoroughly reviewing their child's IEP or delays in the start of services after transitions to new schools. These challenges, often

➤ *63% of parents agree that students with disabilities transitions between grades/schools in BCSD is seamless.*

Parent Survey

attributed to staff being unaware of specific student needs, were particularly frustrating for families of students with highly individualized needs.

The lack of clarity among staff and parents regarding the transition processes for grade-level changes within the same school building may contribute to inconsistencies, leading to varied experiences for

students and families. Establishing clear, districtwide procedures for transitions—such as consistent sharing of student data, structured collaborative meetings between sending and receiving staff, and proactive engagement with families—could help address these issues.

Addressing these gaps and providing targeted guidance to staff on effective transition practices can enhance collaboration, improve alignment across grade levels and schools, and support seamless transitions for students with disabilities.

Transition Planning and Post-Secondary Outcomes

BCSD demonstrates a strong commitment to preparing students with disabilities for post-secondary outcomes, reflected in its impressive graduation rate of 80% for students with disabilities during the 2022-2023 school year. This rate not only surpasses the state target of 68% but is also just four percentage points below the districtwide graduation rate of 84%, underscoring the effectiveness of BCSD's strategies in supporting students with disabilities. This success is a key indicator that BCSD is equipping students for life beyond high school, including college, careers, and independent living.

The transition planning process in BCSD provides a structured framework to support these outcomes. Beginning at age 12, students participate in an Initial Career Assessment, which, while not included in the IEP, establishes an early foundation for future planning. Learning Specialists complete at least one career assessment with students, utilizing tools such as the Transition Planning Inventory (TPI-3) or CareerScope. Parent input supplements these assessments, contributing to a comprehensive approach to identifying student interests and goals. This process is further supported by the District's Transition Specialist, who assists in administering assessments and provides guidance to staff and families.

➤ *34% of staff agree that students of transition age have Transition Plans that are meaningfully used to support post-secondary outcomes.*

Staff Survey

At age 15, the formal transition planning process in BCSD begins, incorporating post-secondary goals and transition services into the IEP. While this process represents a significant investment in students' futures, survey data from both staff and parents reveal notable gaps in practice and perception. Among staff survey respondents, only 34% agreed that students of transition age have Transition Plans that are

meaningfully used to support post-secondary outcomes. Similarly, parent survey feedback highlights areas for improvement, with only 22% agreeing that the IEP team identified transition services (e.g., community service, independent living skills) to help their child, and just 28% agreeing that their child's transition plan is preparing them for life after high school. Only 29% of parent survey respondents agree that the IEP team developed individualized goals related to post-secondary education, employment, independent living, and community participation. These findings underscore a disconnect between staff and parent perceptions and the programs and supports the District has provided for transition planning, indicating a need to align practices more closely with high-quality transition planning during the IEP process.

To address this, it is critical for staff to better understand how these supports align with high-quality transition planning, which occurs during the IEP meeting. BCSD has made strides in this area, prioritizing professional development on transition planning.

The Transition Specialist has led training sessions on selecting and using transition assessments and developing measurable, meaningful transition goals for both staff and parents. These sessions include exemplars of well-constructed goals for staff and families to reference when developing transition goals. Despite these efforts, our review of the goals in transition plans, survey data, and staff feedback indicate that further focus on improving the understanding, development, and application of high-quality transition plans is needed. In an effort to support families the Transition Specialist also works directly with families to create post high school plans.

The Transition Specialist created a website of resources for families that include several topic areas and includes links to the following resources:

- Recreation Options
- Colleges with Support Programs
- Transition Institute – Informational Videos
- Westchester County Office for People with Disabilities
- OPWDD Information
- The Boost – a site that offers Developmental Disability news that is focused on NY State
- Paratransit – which is a shared ride service in Westchester County

BCSD also leverages Naviance as a tool for students to self-report their post-high school plans, such as attending a four-year college, enrolling in a two-year program, joining a vocational program, or entering the workforce. However, the District does not conduct follow-up surveys to track where students, with or without disabilities, end up after graduation. While some districts administer surveys 1-5 years post-graduation, this process relies on voluntary responses from students or parents to provide meaningful insights. For this review, data from Naviance was not analyzed, as it would not provide conclusive insights into whether students pursued their reported plans post-high school. However, as noted earlier in the report, of the 29 students who graduated in Spring 2024, 25 students (86%) were engaged in various post-secondary opportunities ranging from employment, pursuing a bachelor's or associate degree, or attending a career education or trade school. Exploring strategies to collect and analyze post-graduation outcomes 1-5 years after students leave could provide valuable insights into the effectiveness of transition planning and post-secondary support. District leadership has already expressed an interest in finding ways to explore this when students graduate high school.

- *29% of parents agree the IEP team developed individualized goals related to post-secondary education, employment, independent living, and community participation.*
- *22% of parents agree the IEP team identified transition services (for example, community service, independent living skills, etc.) to help their child.*
- *28% of parents agree their child's transition plan is preparing them for life after high school.*

Parent Survey

The Transition Specialist also serves as a liaison with external agencies, such as the Office for People with Developmental Disabilities (OPWDD), supporting families with the application process and connecting them with resources to facilitate successful transitions to adulthood. However, frequent turnover in this role— it was reported that three individuals have occupied the position in recent years— was noted as a potential barrier to sustained support. Focus group feedback emphasized the importance of continuity in this position to maintain consistent collaboration with Learning Specialists, guidance counselors, and families.

BCSD offers academic programming for students with disabilities in the high school, such as 15:1 classes for those pursuing a Regents diploma and 8:1:1 classes focused on transition skills. There are two Special Classes that are supported by job coaches (1.5 FTE) that train students in travel training, pre-vocational work, community job training, and interviewing/resume writing skills. This type of programming supports students who are typically with the District until they turn 22 and require more than academic supports to be successful in achieving their post-secondary goals.

BCSD has laid the foundation for transition planning through early assessments, staff training, and interagency collaboration. However, there are opportunities to strengthen the quality of Transition Planning Forms, maintain continuity in the Transition Specialist role, and develop specialized post-secondary programming to further support students with disabilities. Additionally, exploring strategies to track post-graduation outcomes could provide valuable insights to enhance BCSD's transition planning efforts and align staff practices with the District's transition planning framework.

Student Perceptions of Special Education in BCSD

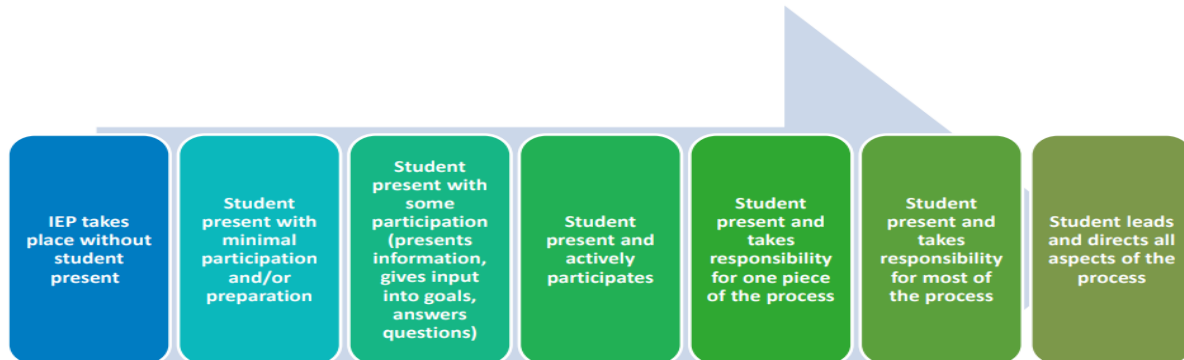
Increasingly, districts across the country are adopting student-led IEPs as a best practice to empower students with disabilities to take an active role in their education and develop self-advocacy skills. Research shows that involving students in the IEP process can improve their understanding of their goals, increase engagement, and enhance their ability to advocate for their needs.⁷⁵ While BCSD currently includes students in their IEP meetings when appropriate, it does not yet have formal guidance, protocols, or training for staff on implementing student-led IEPs. This represents an opportunity to strengthen student engagement and foster leadership skills by building a more structured approach to student participation in the IEP process.

This graphic below illustrates the Student-Directed IEP Continuum, which represents the varying levels of student involvement in the IEP process. The continuum ranges from situations where the IEP takes place without the student present to scenarios where the student leads and directs all aspects of the process. Intermediate levels of participation include minimal involvement, providing input on goals, actively participating, and taking responsibility for portions or most of the process. Currently, BCSD falls in different parts of this continuum, depending on the student and situation. However, based on our review, the District has not yet progressed to the latter stages where students lead part, most, or all of the IEP process. This highlights an opportunity for BCSD to explore ways in which students with IEPs can take a greater role in CSE meetings and their IEP development.

EXHIBIT 30. STUDENT-DIRECTED IEP CONTINUUM

⁷⁵ Hawbaker, B. W. (2007). Student-Led IEP Meetings: Planning and Implementation Strategies. *TEACHING Exceptional Children Plus*, 3(5). <https://eric.ed.gov/>

Student-Directed IEP Continuum



“Student participation throughout the IEP process should be individualized and based on the age, needs, and abilities of the student. “

- OSSE Secondary Transition Website

Adapted from Thoma & Wehman. (2010). Baltimore, MD: Paul H. Brooks Publishing Co.

As part of this review, a student survey was conducted with students with IEPs in grades 8-12 to gain insight into their experiences, perceptions, and engagement within BCSD’s special education program. Previously discussed in Chapter 1 under Other Success Measures, the survey provided a valuable opportunity to hear directly from students about their educational journey and the support they receive, offering a student-centered perspective to inform ongoing improvements.

Although the response rate was limited, the survey results offer important insights into BCSD’s strengths and areas for improvement in supporting students with disabilities. Using a Likert scale, the survey asked students to reflect on how often certain practices or supports occurred. The data below combines responses from students who selected “Always” or “Most of the Time,” providing a meaningful lens to assess BCSD’s special education program.

Half of the surveyed students reported being invited to attend their IEP meetings to discuss their learning needs. Of those who attended, a notable 88% indicated they felt comfortable participating, suggesting that when students are included, the environment fosters engagement and confidence. Additionally, 88% of these students stated they talked about their strengths and interests during the meeting, and an equal percentage discussed what was hard or easy for them at school. These findings highlight a strength in creating a supportive and inclusive atmosphere for student participation. However, only 69% of students who attended reported discussing their postsecondary goals, such as career aspirations, living arrangements, and community participation—an essential component of transition planning. This decrease suggests a need to more intentionally address future planning during IEP meetings to better prepare students for life after high school, which aligns with survey data on development of transition plans and their efficacy.

Survey data suggests room for growth in how teachers engage students in conversations about their futures. Only 18% of students reported that their teacher “always” or “most of the time” talks to them about what they want to do after graduating. Similarly, just 29% said their teacher engages them in discussions about their strengths and career interests. While half of the students (50%) said their teacher helps them understand graduation requirements and the skills needed to graduate, this leaves a significant portion of students without clear guidance on what is required for their next steps. Despite

these gaps, 67% of students reported feeling that they are being prepared for life after high school, and 61% believe they are gaining the skills needed to be as independent as possible after graduation. These findings indicate that while there is some progress, more consistent support and structured guidance around transition planning could greatly enhance students' readiness for postsecondary life.

Students expressed positive perceptions regarding the help they receive in school, with 83% indicating they receive the support they need to do well. Additionally, 77% of students felt their teachers were interested in their well-being beyond academics, which reflects a broader sense of care from staff. Open-ended responses reinforced these findings, with students highlighting feelings of inclusion, supportive staff, helpful accommodations, and SAS classes as a valuable resource. However, there is room to build on these successes by fostering a supportive environment for all students and exploring new extracurricular opportunities, such as a music program at the Hillside alternative campus, which one student identified as a significant need.

A few areas of opportunity emerged from the survey data and open-ended responses. Two students expressed concern about being pulled out of class for services they felt were no longer necessary or beneficial. This feedback suggests the need for a closer examination of how services are provided and whether they align with students' evolving needs. Additionally, while many students feel supported, only a small number reported they are consistently engaged in discussions about their strengths, interests, and postsecondary aspirations. Addressing these gaps could foster a more individualized and empowering approach to preparing students for their futures and take into account students' feedback.

The student survey results provide a snapshot of BCSD's efforts to support students with IEPs, with clear strengths in fostering a supportive environment and providing necessary accommodations. However, there are opportunities to deepen engagement, particularly in student-led IEPs, transition planning, career exploration, and aligning services with student needs. By addressing these areas, BCSD can further empower students to take ownership of their learning and prepare for life beyond high school.

BCSD'S CONTINUUM OF SERVICES

Philosophy of Inclusion across the Continuum

Although BCSD has made significant efforts to establish a comprehensive continuum of services and a vision centered on inclusion, both staff and parent focus group participants noted a noticeable disconnect between the District's inclusive vision and practices happening on the ground. Staff have expressed concerns about a significant divide between special education and general education teams and their understanding of inclusion, with many perceiving a culture where special education students are viewed as the "other students" rather than being integrated into the broader student body alongside their general education peers. This perception reflects a broader vision, with some buildings differing in their commitment to and implementation of inclusive practices. These gaps highlight the critical need for strong leadership at the building level to establish, nurture, and promote a consistent, districtwide culture of inclusion.

Focus group participants emphasized the critical need for increased collaboration between special education and general education teachers. Staff identified the lack of efficient co-teaching and collaboration as a barrier to meaningful inclusion. Parents, too, expressed their concerns that special education teachers are often stretched to their limits, hindering their ability to fully support students with disabilities in their classrooms. Parents strongly emphasized the need for students with disabilities to be visibly included in key components of school culture such as the yearbook committee and school dances, where they can connect and meet their peers. Many parents expressed concern that self-contained classes are often overlooked, as students in these settings are not integrated with their peers enough. There is a need for greater awareness and intentional inclusion of students in self-contained classes to guarantee they feel recognized as an integral part of the school community. Students in self-contained

classes involvement should be seen as essential, and efforts must be made to celebrate students with disabilities participation and contribution to the overall school culture.

Despite these challenges, staff and parents acknowledged BCSD's meaningful strides towards inclusion and highlighted numerous positive examples of inclusive practices. The District is actively working to create more inclusive events that allow students of all abilities to participate but also raise awareness about the strengths and needs of students with disabilities. Programs such as the Pioneers Club, Best Buddies, Neurodiversity Week, and inclusive sports are just a few examples of efforts aimed at fostering a more inclusive school culture.

Access to the General Education Curriculum

BCSD has adopted a comprehensive curriculum for Math, called Math Bridges, and for Literacy, called Bookworms. Focus group participants expressed mixed opinions about student access to the general education curriculum. Some staff members felt that Bookworms and Bridges were not fully accessible to self-contained students and remained limited to those in less restrictive environments. In contrast, other staff believed the new curriculum rollout to be highly inclusive, prioritizing that all students have access to grade-level texts and materials. Additionally, some staff perceived that students served primarily in special education classes are spending more time in the general education setting and/or participating in Tier I instruction in general education settings than in previous years.

However, a concern raised was the gap between the rollout of new curriculum, differentiation of curriculum, and the lack of adequate training for its effective implementation. Some staff perceived general educators to receive training in Bridges intervention while special educators were left out of this professional development opportunity. Many expressed frustration that professional development opportunities were primarily designed for general education teachers with little emphasis on how the curriculum can be adapted and made accessible for all students. This sentiment was particularly relevant for special educators teaching students in a self-contained placement. Students with disabilities in self-contained placements may spend time in the general education setting or may have IEP goals aligned to grade level standards. It is important that self-contained special educators can be trained and be provided access to materials to modify for their students. It was reported that self-contained special educators have access to a container of materials. Several self-contained special educators who participated in this study reported having to create materials or significant modifications on their own to support access and alignment to grade level curriculum.

Amid these concerns raised by staff, the District has made commendable efforts to provide targeted summer enrichment opportunities for students participating in Wilson intervention. Students can attend a four-week summer bootcamp program, receiving one hour of instruction per day from reading specialists. This initiative has yielded positive academic outcomes.

While BCSD's curricula shows promise in fostering inclusivity and rigor, there is a pressing need for more comprehensive professional development and support to affirm that all educators can effectively implement the curriculum across the continuum.

BCSD's Preschool Programming

BCSD offers a comprehensive, full-day, tuition-free Universal Pre-K program for eligible students. Admission to the Universal Pre-K program is through a lottery system. The program is fully funded by a Pre-K Expansion grant from the NYSED. Special education and related services are provided to eligible preschoolers onsite and in accordance with their IEPs. Service provision for BCSD preschoolers with disabilities is managed by the County, not the District.

The District has made the seamless transition from preschool to elementary a top priority. To support this, District leadership has organized a comprehensive CPSE to CSE Transition Night for families. Administrators and Coordinators engage directly with families during this event to review the elementary

continuum of services and support options available. Integrated, District level processes are executed prior to transitioning preschoolers with disabilities to BCSD classrooms. To prepare for a student's transition, CPSE chairperson(s), Elementary Coordinators and/or Special Class Coordinators visit preschool classrooms throughout the year. These findings, in partnership with CSE team input, are utilized to develop the student's IEP including placement.

BCSD's Special Education Continuum for K-12

IDEA requires students with IEPs to receive a Free and Appropriate Public Education (FAPE) in the most appropriate setting for their individual needs, also referred to as the 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 support, 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:⁷⁶

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.

The continuum of services is inherently fluid and designed to meet the evolving needs of each student. For example, a student requiring a self-contained classroom early in their education may later transition to a general education classroom with supplementary aids and services. Similarly, a student encountering new challenges may temporarily need a more restrictive setting before returning to a less restrictive environment. The flexibility of this model supports placement decisions that are driven by individualized needs rather than fixed program designs, promoting equitable access to appropriate educational opportunities.⁷⁷

- 65% of staff agree BCSD offers a continuum of services to meet the needs of all students.
- 76% of staff agree the special education programs/services at their school(s) are of high quality.

Staff Survey

The BCSD Department of Special Education has established a protocol to reserve seats in general education classrooms for all eligible students regardless of placement. It is embedded within District operating procedures to include students with IEPs receiving services in Special Class on the corresponding general education roster. This was a pivotal stance in documenting the District's commitment to inclusive practices by prioritizing the collective inclusion and identification of all students within a given grade. Focus group participants noted that this practice has facilitated opportunities for inclusion during and outside of the school setting. Anecdotally, it was acknowledged that students receiving services in more restrictive settings are invited to birthday parties or receive holiday cards from peers in their assigned general education classroom.

The continuum of services and support offered in BCSD focuses on teaching and learning for students with disabilities from the least to most restrictive setting necessary to receive the educational benefits to which they are entitled. BCSD provides a range of services and support unique to students with

⁷⁶ https://iris.peabody.vanderbilt.edu/wp-content/uploads/pdf_info_briefs/IRIS_Least_Restrictive_Environment_InfoBrief_092519.pdf

⁷⁷ Bateman, D., & Linden, M. A. (2006). Better IEPs: How to develop legally correct and educationally useful programs. Sopris West.

disabilities and are available throughout the District. Decisions regarding where a student will access their FAPE are based upon the CSE committee's determination. Below is a breakdown of the continuum of services and support offered in BCSD and compiled by PCG:^{78,79}

EXHIBIT 31. PROGRAM DESCRIPTIONS OF BCSD'S CONTINUUM OF SERVICES FOR K-12

Program	Description
Related Services	Related services are those that assist a student in benefiting from other special education services or assist the student in accessing the general curriculum. Students may be eligible for one or more of the following services: Speech Therapy, Occupational Therapy, Physical Therapy, and Counseling Services. Services are provided in a small group or 1:1, push in or pull out of the classroom and duration recommended by the provider.
Resource Room Program	Resource room is a support class students attend several times per week to work with a special education teacher in skill development. Resource room teachers will often focus on student literacy, math, organizational, and study-skill growth and independence.
Skills and Support (SAS) – Secondary Level	SAS is a Special Class recommended by the CSE generally for students who are in integrated co-teaching classes (ICT). Students are generally grouped by grade level and meet one period daily with a ratio of 12:1. The SAS class focuses on skill remediation and content curriculum support led by a Learning Specialist and in some classes, a Teacher Assistant or Aide also supports.
Consultant Teacher Services (CTS)	CTS can either be direct and/or indirect. Direct service means a special education teacher provides support within the general education classroom or alternative locations. In-Direct CTS is where the special education teacher consults outside of the classroom with the general education teacher on a student's progress and offers the teacher support in meeting the student's individualized needs.
Collaborative Program – Elementary Level	This model allows students in Special Classes who are cognitively able but require more than resource room minutes to access the curriculum in ELA and Math. This is a multi-grade program (K-1, 2-3, 4-5) that exists at some elementary schools across the District. It is staffed with a Learning Specialist and Teaching Assistant. Students are pulled out for Special Classes and provided support in the classroom when needed.
Integrated Co-Teaching – Secondary Level	The co-teaching model consists of a special education and general education teacher sharing equal responsibilities for the instruction, management, assessment, and overall facilitation of a class.
Therapeutic Support Programs (TSP) – Secondary Level Middle School: Navigating	NEST is a TSP program that provides emotional, behavioral, psychiatric, family, and community support to students who present with various emotional and behavioral difficulties, to allow them to access learning in the school environment – both in and out of the classroom. NEST is not a self-contained program, thus students attend general education (mainstream) classes and/or special education classes such as SAS, Co-Teach, or Resource Room. Students only attend one daily period in the TSP suite. All

⁷⁸ BCSD Continuum of Services and Programs document, Fall 2024

⁷⁹ "Student Supports by Grade Level", Special Education Department BCSD Website. <https://www.bcsdny.org/departments/special-education/committee-on-special-education/student-supports-by-grade-level>

<p>Emotional Success Together (NEST)</p> <p>High School: Keys to Emotional Awareness (KEA)</p>	<p>TSP students receive psychological counseling services (group, individual, or both).</p> <p>KEA is a TSP program that helps emotionally fragile students develop coping strategies to be better able to deal with academic, social and emotional situations on a daily basis. A full-time psychologist and consulting psychiatrist play an integral role with students in the program. The program is also staffed by two Learning Specialists and two Aides. Students receive resource room support with the KEA classroom and are fully mainstreamed for subject area instruction</p>
<p>Specialized Reading</p>	<p>Specialized Reading Instruction is a related service targeted to students with reading disabilities who require an Orton-Gillingham approach to reading. This service is provided outside of the classroom to allow targeted and systematic intervention.</p>
<p>Special Classes</p>	<p>Students in need of greater support attend Special Classes consisting of only special education students. There, the specially designed instruction and smaller student-teacher ratio are aimed at supporting students individualized academic growth. Special Class ratios are 12:1:1, 12:1:2, and 8:1:3.</p>
<p>Hillside Alternative School</p>	<p>The Hillside program is an alternative high school that serves classified and non-classified students in an inclusive setting. Hillside is appropriate for students who perform best in a small, highly structured setting with a high staff to student ratio. The instructional staff consists of teachers with content area specialization and expertise in special education instructional strategies and techniques. Opportunities to matriculate in specific courses at Fox Lane High School, enroll in BOCES Tech Programs, and participate in after-school sports and extracurricular activities are reviewed on an individualized basis. The program is supported by a full-time social worker and psychologist, and a part-time guidance counselor. Students receive individual and small group counseling as needed.</p>

Staff study participants shared feedback on the appropriateness of BCSD’s continuum at the District level and within their respective buildings. Three quarters of staff survey respondents (76%) believe that the special education programs and services at their school are of high quality. Comparatively, 65% of BCSD staff survey respondents agree that District offers a continuum of services that adequately meets the needs of all students. Narrative survey responses and focus group feedback from BCSD staff and parents echoed the need for a more expansive continuum of services, particularly for Integrated Co-Teaching at the elementary level. Broader qualitative data findings affirmed that while BCSD offers diverse programming for students with IEPs, particularly given the District size, individual schools may excel in delivering high-quality services and support for eligible students.

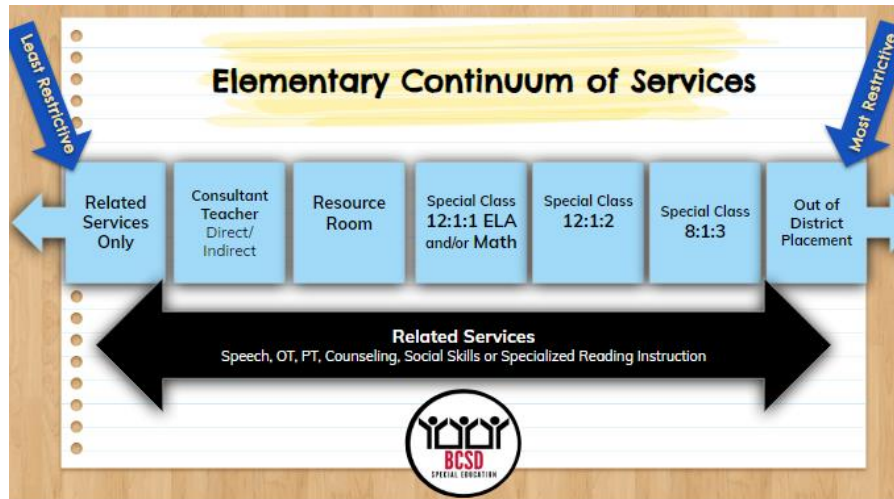
Elementary Continuum of Services

BCSD offers a continuum of programming to support students with disabilities at the elementary level:⁸⁰

EXHIBIT 32. ELEMENTARY CONTINUUM OF SERVICES⁸¹

⁸⁰ “Student Supports by Grade Level”, Special Education Department BCSD Website. <https://www.bcsdny.org/departments/special-education/committee-on-special-education/student-supports-by-grade-level>

⁸¹ “Student Supports by Grade Level”, Special Education Department BCSD Website. <https://www.bcsdny.org/departments/special-education/committee-on-special-education/student-supports-by-grade-level>



The elementary continuum of services within BCSD demonstrates a commitment to meeting diverse student abilities. However, the absence of Integrated Co-Teaching (ICT) at the elementary level was consistently identified by study participants as a significant gap in the District's continuum of services. An elementary pilot ICT program was offered several years ago in BCSD at Pound Ridge elementary school. It was reported that the pilot program was not centrally located and was difficult to access via public transportation. This building was selected due to limited space in other elementary schools. These non-programmatic factors affected the effectiveness of the pilot and, ultimately, the districtwide implementation of an elementary ICT model. The need and desire for elementary ICT programming remains a top priority for many in BCSD. Competing priorities, such as space, location, and staffing, may influence how District leadership approaches this opportunity.

Students receiving support through the Consultant Teacher (CT) model are provided specially designed instruction throughout their day with Learning Specialists and/or Teaching Assistants pushing into their general education classrooms. Staff felt that some Teaching Assistants possess the skills to provide academic support and have received training, but did not feel this is not consistent across the District. Staff believe this inconsistency limits the capacity to effectively support students with disabilities in these inclusive settings, potentially hindering their access to high-quality instruction alongside their peers.

Additionally, the introduction of new curricula for English Language Arts (ELA) and Math—Bookworms and Bridges, respectively—has created scheduling challenges that impact students with disabilities. For example, Bookworms requires a structured instructional block with specific timing, but students with IEPs who need pull-out support for reading are often removed from this block, resulting in missed Tier 1 core instruction. This issue was particularly highlighted for the ELA block, where scheduling conflicts led to interrupted learning experiences for these students so they could receive special education services.

Focus group and survey data underscored the need for schedules that prioritize equitable access to core instruction. Staff consistently emphasized that students should not be pulled out during essential instructional time and that the master schedule should accommodate the needs of all learners rather than dictate when services can be provided. BCSD is currently conducting a thorough analysis of each school's master schedule with a subject matter expert to maximize time on instruction. This analysis should aim to optimize the use of staffing resources and create schedules that align with best practices for supporting all students. Research indicates that effective master scheduling can improve instructional quality, maximize learning opportunities, and reduce disparities in access to Tier 1 instruction for students

with disabilities.⁸² By aligning master schedules with these goals, the District can strengthen its commitment to providing a fully inclusive and supportive educational experience for all students.

At the elementary level, Special Class programming in BCSD is structured to meet the diverse needs of students who require more intensive support to access the curriculum. The District offers three primary Special Class options: a 12:1:1 class for English Language Arts (ELA) and Math, a 12:1:2 class, and an 8:1:3 class designed for students who need a highly structured environment throughout their day. These classes focus primarily on academics and/or highly specialized instruction to support student learning. However, staff report there is currently no dedicated Special Class specifically designed to address the behavioral needs of elementary students. Some staff expressed that this gap represents a missed opportunity to help students develop critical self-regulation and executive functioning skills early in their education. It was suggested that mirroring some of the secondary-level programming, which provides targeted support for students with behavioral challenges and executive functioning skill deficits, could be highly beneficial at the elementary level. Such a model would provide students with strategies to manage their behavior while also enhancing their ability to actively participate in both academic and social settings. This approach would support their development throughout their school years and facilitate a smoother transition from elementary to secondary education.

Staff also highlight challenges with inclusivity for students in Special Classes, emphasizing that a divide persists between general and special education when it comes to including students in Special Classes in the general education setting. This divide is compounded by general education teams' heavy focus on curriculum delivery, which staff believe make it difficult to modify instruction effectively for students with complex needs. Staff note that without sufficient training and collaborative planning time, general education staff often struggle to meaningfully include students with more complex manifestations of their disability in classroom activities.

Additionally, Special Classes often require additional materials and resources, such as picture symbols, sensory tools, binders, and laminating materials, to effectively support their students. However, staff report they receive the same budget allocation as other classrooms, despite having significantly greater material needs. Staff emphasized the importance of addressing this inequity so that that Special Classes are adequately resourced to meet their students' needs effectively.

The onsite visits to BCSD's elementary schools highlighted both strengths and areas for growth across a range of instructional and support practices. Observations revealed dedicated and skilled staff who are passionate about their work and committed to supporting students with disabilities. Throughout the schools, all staff were highly engaged and utilized in meaningful ways, contributing significantly to the classroom environment. Classrooms featured flexible seating arrangements, break spaces, and strengths-based anchor charts that fostered welcoming and inclusive settings. Additionally, schools showcased creative and diverse supports, such as Jacey the therapy dog, and unique learning opportunities with chickens and bees, further enriching the educational experience for students at one school visited.

Instructional practices observed across classrooms were generally strong, with lessons demonstrating intentionality, appropriate rigor, and alignment to student needs. BCSD has made a commitment to structured literacy instruction, utilizing an Orton-Gillingham (OG) approach with a combination of interventions tailored to student needs. Programs such as the Wilson Reading System and Preventing Academic Failure (PAF)—an OG-based structured literacy program designed to support reading, spelling, and handwriting in elementary grades—along with other targeted interventions, reflect the District's efforts to provide comprehensive literacy instruction. Staff have received training in these approaches, and

⁸² Hackmann, D. G., Malin, J. R., & McCarthy, M. M. (2019). Effective scheduling practices for meeting student needs: A framework for success. *NASSP Bulletin*, 103(1), 3–21. <https://doi.org/10.1177/0192636519839267>

BCSD continues to equip educators with the necessary tools and resources to support reading development.

The OG approach is a well-regarded, evidence-based method for teaching students with dyslexia and other reading difficulties. However, it is just one of many effective approaches to literacy instruction. Research indicates that while OG-based interventions can be beneficial, their effectiveness may vary, and they should be part of a broader, diversified instructional approach.⁸³ These findings highlight the importance of integrating multiple instructional approaches to effectively address all aspects of reading development.

The current focus on the Science of Reading emphasizes the importance of addressing all five essential components of literacy: phonemic awareness, phonics, fluency, vocabulary, and comprehension.⁸⁴ To support well-rounded reading development, a comprehensive literacy program should integrate multiple research-based strategies that address each of these areas. Our analyses show BCSD is taking a comprehensive approach by incorporating a variety of research-based interventions into their literacy programs. This diversified strategy allows students to receive targeted support across all components of reading development. By implementing multiple instructional methods tailored to student needs, BCSD is strengthening its ability to provide effective, evidence-based literacy instruction.

A challenge previously identified was the lack of a clear, standardized literacy curriculum for students in the 8:1:3 Special Class. However, the District is using Comprehensive Literacy for All⁸⁵, a framework by Erickson and Koopenhaver that includes the use of Readtopia and Unique Learning curricula. This curriculum is aligned with Bookworms, the District's general education literacy program, supporting greater cohesion between general education and Special Classes.

- 85% of staff agree their school effectively communicates the importance of high expectations for all students.
- 77% of staff agree that school and district leadership have high expectations for students with disabilities.
- 80% of staff agree that school staff have high expectations for students with disabilities.

Staff Survey

The District is currently addressing a challenge in the 12:1:2 Special Class, where there is no standardized curriculum for staff. As a result, some teachers create their own instructional materials, which can lead to inconsistencies in instruction. This challenge was also noted during onsite visits. Addressing this gap with a structured curriculum and instructional resources can help strengthen alignment across programs while supporting educators in delivering high-quality literacy instruction. Incorporating the full range of Science of Reading principles and differentiated supports will further enhance BCSD's ability to meet the diverse learning needs of students while reinforcing its commitment to instructional consistency and student outcomes.

Another area of concern acknowledged was the inconsistent use of augmentative and alternative communication (AAC) across all elementary programming in programs where such supports should be implemented with fidelity. While most staff (77%) felt that students had access to AAC, it was not always

⁸³ Stevens, E. A., Walker, M. A., & Vaughn, S. (2021). The effects of Orton-Gillingham-based interventions for students with or at risk for word-level reading disabilities: A meta-analysis. *Exceptional Children*, 87(4), 397–417. <https://doi.org/10.1177/0014402921998323>

⁸⁴ National Reading Panel. (2000). *Teaching children to read: An evidence-based assessment of the scientific research literature on reading and its implications for reading instruction*. National Institute of Child Health and Human Development.

⁸⁵ Erickson, K. A., & Koppenhaver, D. A. (2020). *Comprehensive literacy for all: Teaching students with significant disabilities to read and write*. Brookes Publishing.

observed onsite for students that would benefit from this support. However, Assistive Technology (AT) was consistently observed during onsite visits and included a variety of high, mid, and low-tech options for students. These AT supports provide accessibility options to all students, not only students with disabilities. Similarly, while progress monitoring was observed in some cases, such as through data sheets for Wilson Reading or ABA/DTT practices in Special Classes, it was not consistently evident across all classrooms. This raises questions about how effectively the District tracks and supports the growth of students with disabilities, which was also noted in our review of progress reports and in parent feedback as well regarding the use of objective data to monitor student progress and make instructional decisions.

BCSD's bilingual elementary program has demonstrated success in merging diverse school communities to serve all students, fostering a strong sense of shared commitment to the continuum of programming to meet student needs in this setting. However, feedback from some BCSD staff suggests that challenges in resource alignment and implementation may have limited the full potential of this program. The need for bilingual special educators who can deliver specially designed instruction in a student's native language was frequently highlighted by student participants as a program need. To support students with disabilities, the Collaborative model was developed so students can receive support in academics from bilingual staff. In this model, students are pulled out for academic support as needed and then integrated back into the general education classroom in a fluid way. The scheduling for these services has played a key role in the program's fluidity. As BCSD considers ICT expansion, it will be essential to consider this program's successes while addressing any barriers that have hindered its effectiveness. Lessons learned from these experiences can potentially guide the development of a sustainable, equitable ICT model at the elementary level.

Despite these challenges, onsite observations underscored BCSD's many strengths at the elementary level. Classrooms were inviting and well-organized, with visible structures to support both group and individual learning. Staff were receptive to feedback and expressed a desire for professional growth, further reflecting their commitment to continuous improvement. Displays of student work, anchor charts, and other visual aids celebrated students' abilities and accomplishments, creating a positive atmosphere for learning.

Overall, while areas such as curriculum alignment, scheduling, and the use of AAC require attention, the onsite visits reaffirmed the high quality of instruction and the dedication of staff in BCSD. By addressing these opportunities for improvement and building on existing strengths at the elementary level, the District is well-positioned to enhance its services and continue providing exceptional educational experiences for all students.

Secondary Continuum of Services

At the secondary level, BCSD provides a comprehensive continuum of programming to support students with disabilities as detailed in the accompanying Exhibits from the District's website.⁸⁶

The secondary continuum offers a broader range of services and programming, including Support and Skills (SAS) and Integrated Co-Teaching (ICT). The graphic below includes Consultant Teacher (CT) at the high school level; however, this model is no longer in use, and only the ICT model is currently implemented. In addition to these programs, the secondary level offers Navigating Emotional Success Together (NEST) and Keys to Emotional Awareness (KEA), both of which provide targeted support for students navigating emotional and social challenges. BCSD has an alternative high school, Hillside, which provides a smaller, more structured environment for students who thrive in a more personalized setting. This broader continuum of services reflects the District's commitment to addressing the varied

⁸⁶ "Student Supports by Grade Level", Special Education Department BCSD Website. <https://www.bcsdny.org/departments/special-education/committee-on-special-education/student-supports-by-grade-level>

needs of secondary students with disabilities, providing them with access to the supports necessary for their success.

EXHIBIT 33. MIDDLE SCHOOL CONTINUUM OF SERVICES⁸⁷

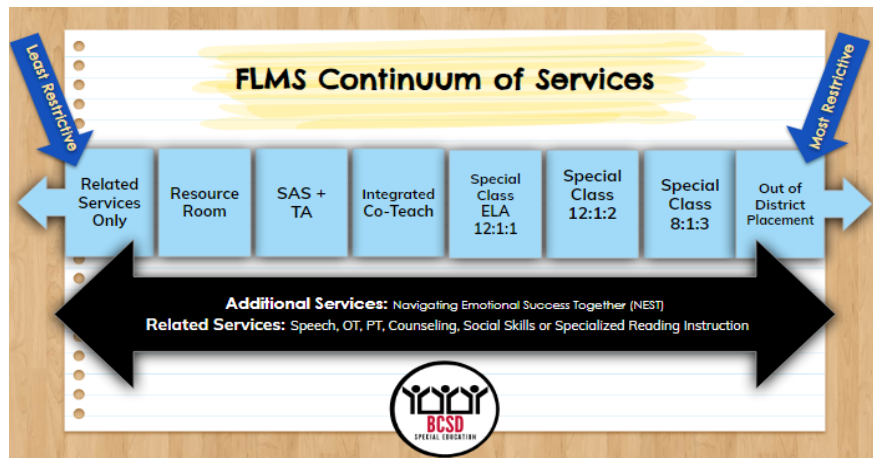
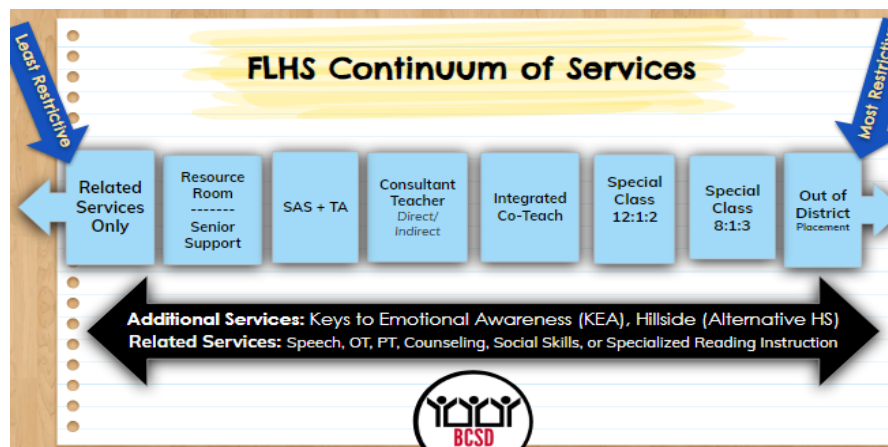


EXHIBIT 34. HIGH SCHOOL CONTINUUM OF SERVICES⁸⁸



The continuum of services observed at the secondary level in BCSD demonstrates notable strengths alongside opportunities for growth, particularly in the delivery of specialized instruction and support. Consistent evidence of Specially Designed Instruction (SDI) was observed in several secondary classrooms during PCG’s classroom visits. For example, intentional planning was evident in the middle school setting where students were provided with both adapted and unadapted texts to meet diverse needs. Co-teaching models varied in effectiveness, with stronger outcomes noted where teaching partners had established collaborative relationships and dedicated planning time. However, in some ICT settings, SDI was less apparent, with instruction focusing primarily on grade-level content supported by additional adults rather than tailored, targeted instruction for students with disabilities. In some cases, Learning Specialists in ICT appeared to function more as teaching assistants rather than delivering specialized support. Concerns noted from focus groups and survey data also emerged about student rosters in co-taught classrooms, with some staff perceiving an overrepresentation of students with IEPs

⁸⁷ Bedford Central School District (n.d.) *Student supports by grade level*. <https://www.bcsdny.org/departments/special-education/committee-on-special-education/student-supports-by-grade-level/>

⁸⁸ Ibid.

and 504 plans. A districtwide analysis of classroom rosters is recommended to establish equitable ratios in co-taught settings and align them with state regulations.

Classroom engagement methods at the secondary level generally demonstrated variety and effectiveness. Observations highlighted the use of modeling and scaffolding, particularly in Special Classes, where students engaged in stations with tasks matched to their needs. For instance, in a 12:1:2 class, staff were effectively utilized to support students, while an 8:1:3 class successfully integrated AAC devices to facilitate student communication. However, data collection methods in Special Classes were inconsistent, often determined by individual teachers without standardized protocols for what to collect and how frequently. Developing districtwide guidance and training for data collection and progress monitoring could enhance consistency, fidelity, and the use of data to inform instructional decisions.

Focus group and survey data underscored additional challenges in curriculum development and collaboration. Special Class teachers reported creating much of their own curriculum, often with limited opportunities to collaborate with general education staff when their students transitioned to inclusive settings. Staff believe this reliance on self-created materials contributed to uneven programming implementation across all schools, not just secondary. Establishing collaborative structures and dedicated planning time could alleviate these barriers, fostering more cohesive and inclusive educational services. Furthermore, progress monitoring practices require attention throughout the District. While some classes employed robust data collection methods, such as those integrated into specialized reading classes, this was not consistent across programs. Standardized protocols and training for data collection and analysis are needed to align progress monitoring with best practices and effectively inform service delivery.

Concerns also arose regarding program assignments in Special Classes, such as the 12:1:2 and 8:1:3 models. Across data sources, there was a lack of clarity about how students were assigned to these programs across schools, and parents expressed negative perceptions of the 8:1:3 program, believing it did not provide a quality education. While this was not clearly observed onsite, these concerns suggest the need for rebranding and clear communication about the purpose and outcomes of these programs.

Skills and Support (SAS) classes exhibited variability in practices. While some classes featured structured direct instruction, others lacked clear objectives, with students primarily working on homework. Establishing clearer guidance and expectations for the structure and purpose of SAS classes would help maintain consistency in meeting students' individualized needs. Although staff and students recognize SAS as an important component of the continuum of services, its effectiveness must align with students' specific needs. Additionally, the roles and responsibilities of Teaching Assistants or Aides in these settings were not always well-defined, raising questions about their necessity and engagement.

In contrast, specialized reading classrooms at the middle school level consistently demonstrated high-quality instruction with appropriate rigor. These classrooms offered engaging, well-structured environments that effectively support student learning.

Across all classroom types, staffing appeared adequate, and in some cases, overstaffed relative to classroom needs. For the most part, adults in classrooms were appropriately utilized to support students with disabilities, though this was not consistent across all settings. Additionally, focus group participants expressed a strong need for additional staff to address social-emotional needs, citing a perceived lack of development in the District's MTSS for behavioral interventions at the secondary level. While the KEA program provides Dialectical Behavior Therapy (DBT) within the school setting, it does not include direct instruction for social-emotional skill development. Staff report that students requiring more intensive social-emotional support often attend classes at BCSD's Hillside Alternative campus.

Another concern identified was the potential overservicing of students at the secondary level, particularly regarding related services. Staff noted that as students progress into higher grades, services typically decrease to prioritize core content instruction. However, many high school students continue to receive related services at high frequencies. Research suggests that for most secondary students, shifting to

consultative models or minimal direct services better supports access to core instruction, unless the student's needs are particularly complex.⁸⁹ This approach helps avoid unnecessary disruptions to academic learning while providing individualized support. Data-driven progress monitoring remains essential to tailor service decisions to each student's needs rather than solely relying on parent preferences.

These findings highlight a promising continuum of services at the secondary level but require targeted efforts to standardize practices, enhance collaboration, and promote equitable and effective programming. Addressing these areas will strengthen service delivery and better support the diverse needs of students with disabilities.

Hillside Alternative Campus

BCSD's alternative campus stood out as a model of warmth and inclusivity, defying the stereotypes often associated with alternative settings. Although separate from the traditional high school in the District, the campus felt seamlessly integrated into the broader educational community. From the moment you entered the building, the atmosphere was inviting, with a palpable sense of positivity and belonging. Staff were actively engaged with students, fostering meaningful interactions, while students were equally engaged in their instruction, demonstrating focus and enthusiasm for learning. Observations revealed strong evidence of rigor and standards-aligned instruction, complemented by trained staff onsite to address social/emotional needs as they arose. The only opportunity for improvement that arose in our data collection was regarding additional extra-curricular activities for students attending Hillside, particularly around the arts.

The school exuded a sense of community, with staff displaying a clear passion for their roles and an unwavering commitment to student success. This level of dedication and the welcoming environment were striking, as such characteristics are not commonly observed in alternative settings, which often struggle to maintain high levels of rigor and a positive culture. At this campus, however, it was evident that students felt safe and comfortable, which created an optimal environment for learning. Staff reported that students have the option to transition back to the traditional high school when they demonstrate readiness, reinforcing the campus's role as a supportive bridge rather than an isolated endpoint. This approach highlights the school's commitment to fostering growth and supporting every student in reaching their full potential.

COLLABORATIVE TEACHING STRUCTURES

Collaboration amongst professionals is multi-dimensional. It requires a deep commitment on the part of all professionals with a common belief that the efforts of two are exponentially greater than those conducted in isolation. However, a commitment to collaboration is not sufficient. It must be accompanied: by 1) strong communication (both verbal and non-verbal) between professionals, 2) the ability to connect in a shared problem-solving interaction, and 3) the commitment to carry out, with fidelity, co-teaching and co-serving models, where a general educator and a special educator collaborate to simultaneously deliver grade-level curriculum to meet the specialized needs of students with disabilities.

⁸⁹ Carter, E. W. (2021). Supporting students with disabilities in secondary education: Practical strategies for inclusive instruction and services. *Journal of Special Education Leadership*, 34(2), 75-85.

Effective collaborators use respectful and effective communication skills to promote positive relationships and build trust among professionals and families. Effective collaborators are aware of and continue to hone their collaboration and communication skills when interacting with others. They also encourage others to share their knowledge and perspectives. Often during the collaborative teaching process, there are interpersonal challenges or differences of opinion. When teachers and other professionals are effective collaborators, they are ready to interact positively and productively with diverse individuals in the school and community.

Collaborative practices are influenced by multiple factors across schools, teachers, and teacher training as well as across different school cultures. These factors may include master scheduling, teachers' attitudes regarding collaboration, teachers' understanding of the co-teaching models, and how to co-plan, co-teach, co-serve, and co-assess as a collaborative team. For collaborative teaching to be effective, it takes districtwide support from district and school leaders who can foster a collective commitment to the collaborative teaching process overall by dedicating their energy to areas of professional learning, increasing team members' collaborative skills, creating schedules that support collaboration, and an ongoing effort to create model co-teaching classrooms from which the district can build upon.⁹⁰

In special education, both co-serving, and co-teaching, are collaborative instructional approaches that involve educators working together to support students with diverse needs.⁹¹

- **Co-teaching** typically involves two or more educators, such as a general education teacher and a special education teacher, sharing responsibility for planning, delivering instruction, and assessing students in a shared classroom. They work together to design lessons, teach, and support all students, including those with disabilities, using various teaching strategies and accommodations.
- **Co-serving**, on the other hand, is a collaborative approach where educators work in parallel rather than jointly teaching within the same classroom. Each educator may work with a smaller group of students or focus on different aspects of instruction or support, complementing each other's efforts to meet the diverse needs of students in the general education setting. Co-serving allows professionals with different skill sets and expertise to work together, pooling their knowledge to create a comprehensive support system for students with disabilities. While they may not directly teach in the same classroom simultaneously, co-servers align their efforts to provide students with multifaceted support tailored to their specific needs. This collaborative model aims to maximize the effectiveness of interventions and support strategies for students with diverse learning needs.⁹²

- *38% of staff agree that BCSD has established standards for delivering co-teaching and collaborative instruction.*
- *56% of staff agree that staff in their building have an effective process by which they collaborate with each other regarding the needs of students with disabilities.*
- *34% of staff agree that general and special education teachers have collaborative planning time to prepare for effective instruction for students with IEPs.*

Staff Survey

⁹⁰ Friend, M., & Cook, L. (n.d.). Collaborative Teaching: What Special Educators and General Educators Need to Know [Review of *Collaborative Teaching: What Special Educators and General Educators Need to Know*]. *Intervention in School and Clinic*.

⁹¹ Ibid.

⁹² Frattura, E., & Capper, C. (n.d.). Integrated comprehensive systems for equity. ICS Equity. <https://www.icsequity.org/>

There are a variety of ways to establish collaborative teaching structures that will meet the needs of staff that may not be able to meet at a regularly scheduled time every week or have limited time in their schedules. The TIES Center provides a comprehensive framework for how collaborative teaching structures can be developed even when teachers may be short on time.⁹³

District Practices

BCSD has not yet established clear standards or structures for co-teaching and collaborative instruction, a gap frequently noted during focus groups, interviews, and onsite visits. Survey data underscores this concern, with only 38% of staff respondents agreeing that BCSD has defined standards for co-teaching and collaborative instruction, and 56% agreeing that their building has an effective process for collaboration regarding students with disabilities. Some co-teaching partners have been paired for several years and in those case, strong collaborative structures appeared to be in place.

- *86% of staff agree their school provides an inclusive environment for students with disabilities.*
- *89% of staff agree that students with and without disabilities have embedded opportunities to interact with each other in academic and non-academic settings.*

Staff Survey

Despite the lack of formal structures districtwide, BCSD has made notable efforts to prioritize inclusive educational services by seeking opportunities for students to be instructed alongside their general education peers rather than relying heavily on self-contained programming. This commitment is also reflected in initiatives like the creation of the Accessibility Team. Formed in the summer of 2023, this multidisciplinary group works to remove barriers and support equitable access to school events and activities, fostering an inclusive and welcoming environment for all members of the school community.

While formalized standards for collaboration are still developing, some staff have demonstrated innovative approaches to co-teaching and team collaboration. Onsite visits highlighted examples of effective partnerships in ICT classrooms where co-teaching teams had strong collaborative relationships. These teams engaged in meaningful planning and alignment, resulting in cohesive and effective instruction for students with disabilities. However, these strong practices were not consistently observed across all settings in the continuum.

The challenges for Special Class and CT staff are even more pronounced, as they often need to coordinate with multiple general education teachers across various grade levels. Without dedicated time for collaboration, planning for the unique needs of students becomes fragmented and less impactful.

Survey and focus group data revealed that staff want:

- Training and support to develop effective co-teaching structures and partnerships.
- Professional development for general education teachers to understand IEPs and how to implement accommodations and modifications with fidelity.
- Opportunities for inclusion of students with disabilities in all classes and events, supporting equitable access to the full educational experience.

While there are pockets of effective collaboration, they are not yet widespread enough to provide all students with disabilities with consistent, meaningful support. Establishing clear standards and providing dedicated time for collaboration across instructional settings would strengthen BCSD's approach and reinforce its commitment to inclusive educational services.

⁹³ TIES Center. (n.d.). The 5-15-45 tool. <https://tiescenter.org/inclusive-instruction/5-15-45-tool>

In addition, strengthening co-teaching partnerships through professional development and addressing barriers to instructional collaboration could further enhance the District's ability to meet the needs of all learners in an inclusive educational setting.

Scheduling and Flexible Support Model (FSM)

The Flexible Support Model (FSM) in special education is a scheduling model where related service providers (RSPs), such as speech therapists or occupational therapists, deliver direct services to students for three weeks of each month. During the final week, referred to as "Flex Week," providers focus on essential non-direct service tasks such as evaluations, IEP meetings, progress reporting, and administrative paperwork. This approach is designed to balance the high demands of service delivery with the need for thorough documentation and compliance with special education regulations. The FSM offers significant benefits, including providing structured time for providers to complete required evaluations and participate in collaborative planning, which can enhance the quality of services.⁹⁴ However, challenges include the potential disruption of service continuity for students, as well as the need for clear communication with families and staff to support that service expectations are met and student progress is maintained. Successful implementation of the FSM requires thoughtful planning and adherence to data-driven decisions to avoid any adverse impacts on student outcomes.⁹⁵

Staff feedback from focus groups and interviews regarding the FSM revealed both questions and concerns about its implementation, impact on service delivery, and equitable practices for all staff providing direct student services. Many staff members felt students often missed services during Flex Week, and these missed sessions were not always made up, leading to disruptions in student support. While the model was intended to provide dedicated time for evaluations, meetings, and paperwork, staff reported meetings frequently occurred outside of Flex Week, undermining its purpose. There was a perception among staff that Flex Week was not consistently or appropriately utilized, with some RSPs reportedly spending the week ineffectively. Additionally, staff noted that IEP meetings were not always scheduled during this time, further reducing its intended utility.

Feedback also highlighted variability in how RSPs used Flex Week across different grade levels. Elementary staff suggested that this time could be leveraged to support MTSS with RSP involvement, while high school staff appeared to appreciate and use Flex Week more effectively. However, middle school staff reported confusion about when Flex Week occurred, leading to inconsistencies and a lack of alignment. Given that RSPs also noted insufficient time to collaborate with staff, this week could be repurposed to foster collaboration and planning.

BCSD provided a detailed explanation of the FSM to families and staff, emphasizing its role in supporting students in the least restrictive environment while aligning therapy goals with the general education curriculum. The communication highlighted the FSM as a nationally recognized, research-backed approach that integrates direct and indirect services to enhance student outcomes. Families were informed of the model's benefits, such as facilitating skill generalization through push-in services, increasing collaboration with educators and parents, and empowering families to support their child's progress at home and in the community. The District provided a clear rationale for the shift, aligning it with broader goals of inclusive practices and improved instructional methods. A structured schedule, including three weeks of direct services followed by a week of indirect services, was shared to demonstrate how Flex Week would function, including detailed examples of activities during the indirect week.

Despite efforts to implement the FSM, staff have expressed concerns about its effectiveness, highlighting a disconnect between the model's vision and its perceived implementation. To address these concerns, it is recommended that BCSD conduct a workload analysis of RSP caseloads and observe how Flex Week

⁹⁴ Williams, T., Carter, J., & Nguyen, A. (2022). *Collaborative scheduling strategies for related service providers in schools*. Inclusive Education Quarterly, 30(4), 45–60.

⁹⁵ Smith, R., & Jones, L. (2020). *Optimizing service delivery models in special education: Balancing compliance and student outcomes*. Journal of Special Education Administration, 45(3), 120–133.

is implemented across buildings. This evaluation would help determine whether Flex Week provides meaningful benefits or if adjustments are needed.

If Flex Week remains in place, District leadership should define clear expectations for its use, support consistency in scheduling and communication, and hold staff accountable for its implementation. Alternatively, the District might consider transitioning to an annual service minutes model, a common approach in many districts that offers flexibility in scheduling while maintaining service delivery. By refining the current system or exploring alternative models, BCSD can maintain the focus remains on student outcomes and equitable support across all grade levels.

Supports for English Language Learners and Dually Identified Students

BCSD's efforts to support English Language Learner (ELL) students, including those dually identified as needing special education services, reflect both areas of progress and opportunities for improvement. Analysis of focus group discussions, interviews, and survey data highlights strengths, challenges, and the need for a more cohesive approach to support equitable access and meaningful support for this population.

- 34% of staff agree services for English Language Learners (ELLs) with disabilities are meeting student needs.

Staff Survey

Survey data indicated that only 34% of staff respondents agree that services for ELLs with disabilities effectively meet their needs, emphasizing an area for improvement. Staff shared concerns that ELL students are often assumed to have disabilities based on their rate of language acquisition, resulting in their disproportionate placement in special

education programs. This perception is supported by data earlier in the report showing that ELL students in BCSD are more than twice as likely as their non-ELL peers to be identified with speech and language impairment.

These findings underscore the importance of distinguishing between language acquisition challenges and actual disabilities to prevent overidentification, which can lead to misaligned services and hindered educational progress. Additionally, some staff noted that cultural and leadership factors at the building level may influence the overclassification of ELL students. This suggests that some building leaders may not fully understand the identification process, highlighting the need for reflective practices to address potential biases and support appropriate classification decisions. Although these perceptions could not be fully verified, they highlight the need for ongoing evaluation of the District's MTSS framework and eligibility processes. By making these systems data-informed, culturally responsive, and grounded in best practices, the District can promote equitable outcomes and avoid the unintended consequences of misidentification for ELL students.

Research consistently emphasizes the importance of providing linguistically appropriate assessments and interventions to accurately identify and support ELL students. Misidentification can have long-term consequences, including reduced academic opportunities and stigmatization.⁹⁶ Supporting access to bilingual services is not only an equity issue but also a legal requirement under IDEA, which mandates that assessments and services be provided in a language most likely to yield accurate results.⁹⁷ By addressing these gaps, the District can better support ELL students and meet their unique needs without overreliance on special education as a solution.

The evaluation and eligibility processes for ELL students were highlighted as an area of concern. The District currently faces a shortage of bilingual evaluators, resulting in delays and, in some cases,

⁹⁶ Klingner, J. K., Artiles, A. J., & Barletta, L. M. (2006). English language learners who struggle with reading: Language acquisition or LD? *Journal of Learning Disabilities*, 39(2), 108–128.

⁹⁷ Individuals with Disabilities Education Act (IDEA), 20 U.S.C. § 1400 (2004).

incomplete or inaccurate assessments by BOCES. Some staff expressed concerns that evaluations conducted by BOCES take too long to complete and do not always provide a comprehensive profile of the student and their needs. However, this perspective was not universally shared among all participants. These challenges can lead to misidentification or delayed identification of disabilities in ELL students. Best practices emphasize the importance of culturally and linguistically responsive evaluations to avoid overclassification or under-identification of ELL students in special education as discussed earlier in this chapter under IEP development.⁹⁸

A challenge staff noted that contributes to the provision of services for dually identified students is the District's lack of bilingual staffing, particularly for dually identified students in the Dual Language program at Mount Kisco elementary school. The absence of bilingual Learning Specialists, evaluators, and other service providers hampers the District's ability to provide linguistically and culturally appropriate support. For example, while ELL students in Mount Kisco receive tiered interventions in Spanish, those who qualify for special education often lose access to services in their first language due to bilingual staffing shortages.

Another challenge staff reported is the limited access ELL and dually identified students have to Advanced Placement (AP) and Honors courses at the high school level. This gap not only impacts these students' academic opportunities but also signals a broader equity issue. Providing clear pathways and tailored support for ELL students to participate in advanced coursework is essential for giving them access to the same rigorous learning opportunities as their peers.

One area of improvement noted by staff is the strengthened collaboration between the Special Education and ESOL departments under the District's new special education leadership. While past perceptions reflected a lack of alignment, staff now observe a more coordinated approach, particularly in addressing systemic issues such as scheduling conflicts and eligibility processes. This enhanced collaboration is critical for creating an integrated system of support for dually identified students.

However, scheduling remains a persistent barrier for dually identified students. Concerns were raised that these students often face conflicts between receiving ESOL and special education services, with special education services typically prioritized. This imbalance prevents students from fully accessing language acquisition support, which is vital for their academic and social development. A comprehensive review of scheduling practices is needed to support equitable access to both types of services without compromising either.

Staff also expressed concerns about the unique needs of newcomer ELL students, particularly at the secondary level. These students often require explicit instruction and targeted support that current programming does not fully address. In some cases, staff reported that ELL students have struggled within the MTSS and RTI frameworks to receive the support they need, emphasizing the need for additional resources and training to appropriately tailor interventions.

Despite these challenges, BCSD has several opportunities to improve its support for ELL and dually identified students. Expanding bilingual staffing, conducting high-quality evaluations, enhancing professional development in culturally and linguistically responsive practices, and addressing systemic barriers such as scheduling conflicts are critical next steps. Additionally, creating programs tailored to the unique needs of newcomers and secondary ELL students will help bridge existing gaps in services. By addressing these issues and leveraging existing strengths, the District can provide all ELL students with the support they need to thrive academically and socially.

⁹⁸ Linan-Thompson, S., Cirino, P. T., & Vaughn, S. (2018). "The role of bilingual evaluation in special education decision-making." *Journal of Learning Disabilities*, 51(3), 214-225.

Behavioral Supports

BCSD's behavioral programming and supports for students with disabilities reveal notable gaps and opportunities for improvement, as indicated by focus groups, interviews, and survey data. With only 41% of staff agreeing that the District has a well-articulated approach to addressing the behavioral needs of students with disabilities, it is evident that a more structured, consistent, and inclusive system is needed. This requires a critical examination of the current MTSS structures in place for supporting behavior, as mentioned earlier in this chapter. Effective behavioral support should begin within general education through a well-developed, schoolwide MTSS framework that provides proactive, tiered interventions for all students. Addressing behavioral needs should not be seen as the responsibility of special education alone; rather, general education plays a pivotal role in implementing strategies that promote positive behavior and prevent escalation. When schools establish strong, research-based behavioral supports within MTSS, they create inclusive environments that benefit all students while also reducing unnecessary referrals to special education for behavioral concerns.

- 41% of staff agree that there is a well-articulated approach to addressing the behavioral needs of students with disabilities

Staff Survey

The District has invested in the Therapeutic Crisis Intervention for Schools (TCIS) framework to promote trauma-sensitive practices and prevent behavioral challenges before they escalate. This approach aligns with best practices in creating trauma-informed schools, focusing on proactive strategies to support students' behavioral and emotional needs.⁹⁹ However, our findings suggest inconsistent implementation of TCIS across schools based on staff feedback. Some staff reported either not receiving the training or feeling that it has not become fully integrated into their daily practices. Moreover, it remains unclear how many staff members have been trained, which roles are prioritized for training, and who is responsible for supporting the framework's fidelity. While TCIS is a general education initiative, its success could significantly benefit students with disabilities if properly adapted and extended to address their unique needs.

EXHIBIT 35. THERAPEUTIC CRISIS INTERVENTION FOR SCHOOLS FRAMEWORK



⁹⁹ Holden, M. J., Holden, J. C., & Mooney, M. (2009). *Therapeutic Crisis Intervention for Schools: Creating trauma-sensitive environments for students*. Cornell University.

At this time, BCSD currently employs one Behavior Specialist to support the District, a limitation that staff believe hinders their ability to provide targeted behavioral interventions. Staff believe this shortage of skilled professionals places additional strain on teachers and paraprofessionals, who may lack the training needed to manage complex behavioral challenges. Research highlights the importance of having adequate staffing, including specialists such as Board-Certified Behavior Analysts (BCBAs), psychologists, and occupational therapists, to address the multifaceted needs of students with disabilities.¹⁰⁰ Staff expressed a desire for more collaboration with these professionals to adopt a whole-child approach to behavioral interventions under the current staffing model and to alleviate some of the challenges with only having one Behavior Specialist to support districtwide.

Staff report paraprofessionals play a crucial role in supporting students with disabilities, particularly those with behavioral challenges. However, staff noted that paraprofessionals often lack sufficient training in behavior management and intervention strategies. Onsite observations and staff feedback indicated instances where students missed instructional time due to behavioral incidents, often seen walking the building with their 1:1 paraprofessional rather than engaging in learning. Providing targeted professional development for paraprofessionals in de-escalation techniques, proactive behavioral strategies, and inclusive practices is essential to maximize their impact and minimize disruptions to student learning.

Concerns about the District's continuum of behavioral programming were also raised. Staff questioned whether the District's current offerings adequately support students with significant behavioral challenges. While Special Classes are part of the District's continuum, staff believe there are limited self-contained programs for students requiring intensive behavioral intervention. At the secondary level, an executive functioning skills class is available, but no comparable program exists at the elementary level and staff wonder whether this may be a way to help students at the elementary level build self-regulation behaviors earlier.

A recurring theme in staff feedback was the perceived lack of clear protocols for responding to students with disabilities who are struggling behaviorally in the classroom. This inconsistency creates uncertainty among staff and can lead to varied responses to similar challenges when working with students with disabilities. Helping staff understand when to conduct Functional Behavior Assessments (FBAs) and implement Behavior Intervention Plans (BIPs) to identify the function of behavior and supporting interventions is key to developing a proactive approach to supporting students. Additionally, embedding regular opportunities for staff to collaborate and problem-solve with interdisciplinary teams—including teachers, psychologists, occupational therapists, and BCBAs—could enhance the effectiveness of behavioral interventions and promote a unified approach.¹⁰¹

We acknowledge that BCSD has taken steps to support staff in managing student behaviors; however, these practices appear to be inconsistently implemented across the District, as indicated by the data reviewed for this report. To address these challenges, BCSD should prioritize expanding behavioral supports and increasing access to specialized staff, with a specific focus on evidence-based strategies that address the unique needs of students with disabilities. One key area for improvement is making sure that all general education staff are trained not only in supporting data collection for FBAs but also in implementing effective BIPs with fidelity. General education teachers and staff are often responsible for carrying out the interventions outlined in BIPs, making their understanding and consistent application of these strategies essential for student success.

FBAs are critical tools for identifying the underlying function of a student's behavior, allowing teams to design proactive, targeted interventions that address the root causes rather than just the symptoms. BIPs

¹⁰⁰ Simonsen, B., Sugai, G., & Negrón, M. (2008). "Schoolwide positive behavior supports: Primary systems and practices." *Teaching Exceptional Children*, 40(6), 32-40.

¹⁰¹ U.S. Department of Education. (n.d.). *Using functional behavioral assessments to create supportive learning environments*. Individuals with Disabilities Education Act (IDEA). Retrieved January 25, 2025, from <https://sites.ed.gov/idea/idea-files/using-functional-behavioral-assessments-to-create-supportive-learning-environments/>

then translate these findings into structured, actionable strategies that must be implemented consistently across all settings to be effective. Without proper training and collaboration, general education staff may struggle to execute these plans as intended, leading to inconsistent interventions and reduced effectiveness. Strengthening professional development in this area will help create a more cohesive, data-driven approach to behavioral supports, so students receive the appropriate interventions needed for meaningful progress.

Since behavior is a form of communication, and understanding what students are trying to convey through their actions is crucial, the District can also benefit from implementing broader approaches and tools that address the complexity of student needs. For example, the Collaborative and Proactive Solutions (CPS) model developed by Ross Greene emphasizes identifying and addressing students' lagging skills—areas where they may struggle to meet expectations due to underlying challenges. This approach shifts the focus from punitive measures to collaborative problem-solving, fostering skill development and strengthening relationships between students and staff.¹⁰²

Additionally, insights from *The Behavior Code* highlight practical strategies for managing challenging behaviors in the classroom. These include modifying the environment to reduce triggers, teaching replacement behaviors, and using preventative measures such as predictable routines and clear expectations.¹⁰³ These strategies align with trauma-informed practices such as those embedded in the TCSI framework, emphasizing the importance of understanding the impact of trauma on behavior and creating safe, supportive environments.

The District should also consider tools and practices that proactively address behavioral challenges across tiers. Expanding the continuum of services and supports, particularly at the elementary level, could include adding executive functioning skills classes or specialized programming for students with intensive behavioral needs. Furthermore, clear, districtwide protocols for implementing FBAs, BIPs, and tiered behavioral supports are essential to provide staff with a consistent framework for intervention. Encouraging collaboration among interdisciplinary teams—including Behavior Specialists, psychologists, occupational therapists, and teachers—ensures that behavioral plans address the whole child and leverage the expertise of multiple professionals.

SUMMARY AND IMPLICATIONS

The findings highlight both strengths and areas for growth within BCSD's special education programming. Across all grade bands, staff demonstrated a strong dedication to their work and a high level of skill. Data analysis has affirmed that District staff prioritize holding students to rigorous expectations and challenging coursework and fostering an environment of academic excellence. The Hillside Alternative Campus also exemplifies this commitment, offering a safe, accessible space where instruction aligns with grade-level standards. Additionally, the District has taken proactive steps in areas such as early transition planning, initiating career interest inventories for students at age 12, ahead of the state's recommended timeline. The District's recent compliance with interpretation and translation services for non-English-speaking parents supports equitable access to critical information, and the availability of assistive technology supports students' ability to access the curriculum. Furthermore, the creation of an Accessibility Team underscores BCSD's dedication to fostering inclusivity.

A central effort in building the MTSS framework was the creation of the MTSS Curriculum Council, which included approximately 40 staff members representing various roles within the District. This council collaborated to define the vision, priorities, and strategies for MTSS implementation. However, some gaps in representation were noted: no special educators serving in self-contained settings participated in the

¹⁰² Greene, R. W. (2021). *Lost at school: Why our kids with behavioral challenges are falling through the cracks and how we can help them* (2nd ed.). Scribner.

¹⁰³ Minahan, J., & Rappaport, N. (2012). *The behavior code: A practical guide to understanding and teaching the most challenging students*. Harvard Education Press.

MTSS Curriculum Council process. While it may not be obvious to include self-contained special educators in a general education initiative, their absence represents a missed opportunity. The District has positioned its MTSS framework as inclusive of all students, making comprehensive representation vital to its success.

BCSD has created an abundance of structures, and subsequent documents, to promote MTSS implementation. It is clear that District leadership has prioritized and invested in supporting the academic outcomes for all students; however, these efforts appear to be siloed. When analyzing the different MTSS structures and staff roles, each functions more as a stream of support rather than an integrated system. There was a notable absence of social emotional and behavioral support as part of Tier 1 practices in BCSD. The approach to inventory existing practices for understanding and implementation is a reasonable first step. It is recommended that BCSD continues to remain focused on the adoption of a robust MTSS framework grounded in academic, social emotional, and behavioral Tier 1 supports.

The continuum of services and support, across grade bands, is robust apart from an elementary ICT model. BCSD staff have made concerted efforts to create highly individualized IEPs with incredibly customized service delivery models to balance inclusion and instruction for students with disabilities. The District should be commended for these efforts while considering the addition of an elementary ICT model.

Despite these strengths, this review has revealed several areas requiring attention to enhance program effectiveness and equity. Transition planning for students nearing adulthood lacks alignment with their transition goals, indicating a need for greater cohesion between programming and individualized transition plans. Similarly, IEP development showed inconsistencies in quality, highlighting the need for strengthened training and oversight. Progress reports lacked objective data, limiting the ability to monitor and communicate students' progress toward annual goals, and there was while there is a process for managing transitions for students with IEPs between grades and schools, staff and parents did not always feel it was effective.

Supports and services for English language learners who are also dually identified with disabilities were not consistently aligned with best practices, which can have a great impact on student outcomes. At the elementary level, limited behavioral programming and inconsistent use of augmentative and alternative communication (AAC) supports hindered some students' ability to fully engage with the curriculum. The Support and Skills (SAS) classes at the secondary level also demonstrates variability in instructional quality and practices, reflecting a need for greater standardization and expectations.

Challenges with collaborative teaching structures were noted, as staff lacked clear opportunities to collaborate effectively to support inclusive educational services. Additionally, Flex Week scheduling for related service providers revealed inefficiencies in service delivery and utilization, with inconsistencies in how this time was used across schools. These operational challenges, if addressed, could help optimize the use of staff time and resources.

The findings suggest that while the District has several foundational strengths, there are opportunities to enhance structures, practices, and consistency across programs. Addressing these areas could support a more equitable and effective educational experience for all students, particularly those with disabilities, and support the District's continued commitment to excellence and inclusivity.

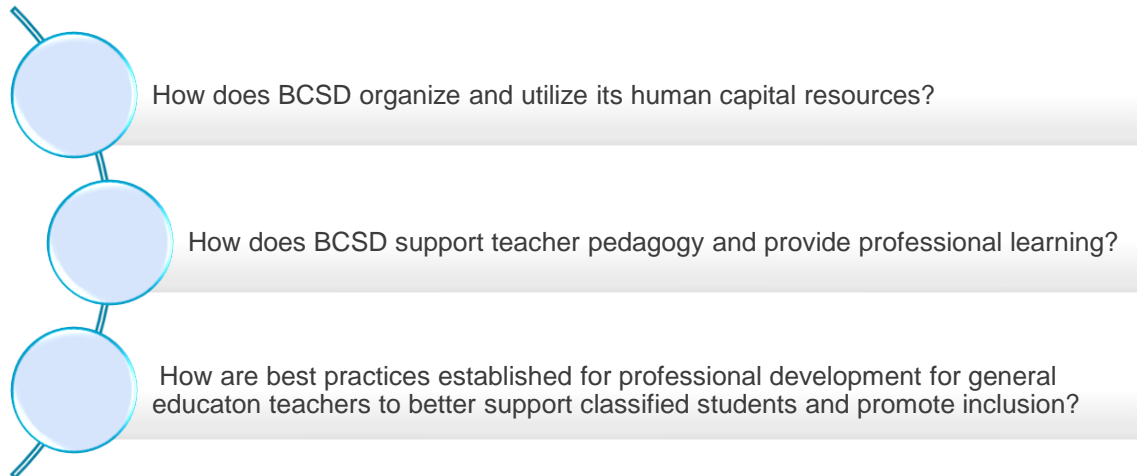
V. HUMAN CAPITAL AND LEADERSHIP

OVERVIEW

This domain within the framework emphasizes the critical role of leadership and human capital in creating an effective special education system. Leadership is essential for fostering a culture of collaboration, accountability, and student-centered decision-making, where school administrators and staff share ownership of the success of students with disabilities. Effective leadership also involves coordinating efforts with community organizations to enhance outcomes for these students.

Equally important is the investment in human capital, ensuring that the staff, from recruitment to retirement, are highly qualified and continuously trained to meet the diverse needs of learners. High-quality staffing, strategic caseload management, and ongoing professional learning are vital components in this area. Experts emphasize that addressing staff shortages in special education should focus on recruiting and retaining teachers with the right skills and passion, placing them in the right schools, and providing them with the professional development they need to succeed. When leadership and human capital align, they create a powerful force for improving student outcomes in special education.

The essential questions we answer in this chapter are:



Below are the overarching strengths and opportunities within the Human Capital & Leadership domain of the Special Education Effectiveness Framework.

Strengths	Opportunities for Improvement
<ul style="list-style-type: none"> • Abundance of Professional Development Opportunities. BCSD has established many guiding documents and professional development opportunities for their staff. • Relatively Low Elementary, Middle, and High School Special Education Teacher Caseloads. Most BCSD’s teacher caseloads are below state requirements. 	<ul style="list-style-type: none"> • Time Allocation for Professional Development. While the District offers a wide range of professional development resources, most PD sessions typically take place outside of regular school hours, as there is limited time available during the school day. • Staff Perceptions of Staffing Levels. Some staff perceive that there is insufficient staffing in special education to effectively support students with IEPs. This view is reflected in the staff survey results, where only 33% of

<ul style="list-style-type: none"> • Relatively Low Related Service Provider Caseloads. Most BCSD's related service provider caseloads are below state and national averages. • Staff Retention. BCSD maintains consistently high retention rates for special education staff across all roles, reflecting stability in staffing. • Collaborative Leadership. The Director's entry plan and the formation of the BOE Subcommittee demonstrate a commitment to collaboration and structured leadership, fostering stakeholder engagement and a clear vision for enhancing special education programming. • Induction Program for New Teachers. BCSD has established an Induction program for new teachers to provide them with embedded supports from the start of their employment. • Teaching Assistant Credentials. In BCSD, Teaching Assistant are required to hold a Bachelor's Degree, which represents a higher credential compared to requirements in most districts for this role. 	<p>respondents agreed that current staffing levels are adequate.</p> <ul style="list-style-type: none"> • Workload vs. Caseload Analysis. BCSD has not conducted a workload analysis to evaluate staffing needs and the utility of the Flexible Scheduling Model. • Director and Assistant Director of Special Education Job Turnover. High turnover in the Director of Special Education and Assistant Director of Special Education positions. • Building Trust and Communication. Some parents and staff have expressed concerns about communication gaps, collaboration challenges, and the leadership team's experience.
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SPECIAL EDUCATION STAFFING FORMULAS AND CASELOAD ANALYSIS

Developing a special education staffing formula is a complex and nuanced process that requires ongoing evaluation and adjustment, rather than being a one-time task. Staffing changes continuously throughout the school year, as students move between schools or in/out of the district and new students are found eligible for services. A staffing formula is also impacted by districts' varying implementation of inclusive practices and the degree to which they employ more "push-in" type support versus more "pull out." According to the Inclusive Schools Network:

The task of determining staffing needs at a school and across a district is challenging because the type and level of support required by each student is determined on an individual basis through the IEP team, yet these student-by-student decisions are significantly impacted by numerous contextual variables. These variables include, but are not limited to, philosophy of administrators and teachers, school leadership factors, classroom practices that support diverse learners, the degree of collaboration and joint ownership for all learners across the entire faculty, and the ability of the leaders to organize the delivery of services through innovative scheduling and staffing practices.¹⁰⁴

¹⁰⁴ Inclusive Schools Network. (2023, September 23). *Staffing Model Resources*. Inclusive Schools Network. <https://inclusiveschools.org/resources/staffing-models/>

As such, special education staffing formulas can differ considerably between states and across districts within the same state. According to a March 2020 study, twenty states have specific policies about caseloads. Each varied widely and used different combinations of factors such as disability category, age range, average caseload, maximum caseload, service provider, amount of time the student is served in special education, type of program, formulas, or some combination of two or more characteristics to determine appropriate caseloads.¹⁰⁵

Several states and professional organizations have created resource guides to assist districts with creating staffing formulas. These resources are designed to aid in the analysis of instructional staff (special education teachers and paraprofessionals) needed as a minimum starting point for providing a full continuum of services and meeting the needs identified in students' IEPs.

Before making final staffing decisions, additional considerations to consider include:

- The level of student needs and types of support services needed;
- Implementation of a full continuum of service delivery models; and
- Compliance with special education legal requirements.¹⁰⁶

Rather than focus solely on caseloads, several guides advocate for the use of a workload analysis, which factors in tasks such as IEP development and progress monitoring in addition to teaching time per special educator.¹⁰⁷ A caseload is different from a workload.

- A caseload is a head count, or the number of students with an IEP for which a special educator is responsible.
- A workload includes all the responsibilities required of special educators and is based on the severity of students' needs.¹⁰⁸

In Illinois, the State Special Education Rule transitioned from a caseload to a workload staffing model in 2007. This requires districts to establish limits on the workload of special educators to ensure the provision of all services required under students' IEPs, as well as ancillary and support services, at the necessary level of intensity. Each district's plan must include an analysis of the activities for which special educators are responsible, such as individualized instruction, consultative services, attendance at IEP meetings, and compliance-related paperwork.

Other states have adopted or are exploring similar approaches. For example, Minnesota developed tools for workload analysis to assess the time and effort required for various educator responsibilities, helping districts allocate resources effectively.¹⁰⁹ Similarly, Pennsylvania introduced a workload framework that accounts for direct instruction, indirect services like collaboration with general educators,

- 33% of staff agree there are enough staff to implement IEPs with fidelity.
- 30% of staff agree related service providers can meet the service times of all students on their caseloads.
- 20% of staff agree they are provided adequate time/coverage to develop IEPs.

Staff Survey

¹⁰⁵ Hogue, L. B., & Taylor, S. S. (2020). A review of special education caseload policies state by state: What impact do they have? *Journal of Special Education Leadership*, 33(1), 1-11.

¹⁰⁶ *Resources - Staffing Considerations*. Special Education - Education Service Center, Region 20 (ESC-20). (n.d.).

<https://www.esc20.net/apps/pages/special-education-resources-staffing-considerations>

¹⁰⁷ Ibid; Yecke, C. P., & Hale, N. A. (n.d.). *Workload considerations for effective special education*.

https://www.mnase.org/uploads/4/7/7/9/47793163/bullard_workload_manual.pdf

¹⁰⁸ Hackett, J., Kostecki, C., Thomas, T., Rodick, B., & Loizzi, M. (n.d.). *Work load plans for special educators: Navigating the process effectively*. Illinois State Board of Education. https://www.isbe.net/Documents/work_load_plans.pdf

¹⁰⁹ Minnesota Department of Education. (n.d.). *Workload tools for special educators*. Retrieved from the Minnesota Department of Education official site.

and IEP management, ensuring equitable staffing practices.¹¹⁰ These models emphasize the growing need to balance workload demands with educator availability, particularly as inclusionary practices like co-teaching become more widespread.

For additional details, see sources like the Pennsylvania State Toolkit and recent updates on workload practices in school-based settings from organizations like Education Resources and NEA's policy resources. These provide examples and calculation methods for implementing workload-focused models effectively.

District Practices

New York State Education Department (NYSED) has established guidelines when determining caseload size.¹¹¹ The chart below provides an overview of service types and corresponding maximum student capacities for special education programs in NY State. It serves as a reference for understanding state guidelines regarding staffing allocations, class sizes, and caseload limits in various instructional and support settings. This information is critical for school districts to support compliance with state regulations, effectively plan staffing needs, and provide appropriate support to meet the diverse needs of students with disabilities.

EXHIBIT 36. NYSED CLASSROOM SERVICE TYPE AND MAXIMUM STUDENT CAPACITIES

Service Type	Maximum Student Capacity	Additional Notes
Consultant Teacher Services	20 students per teacher	
Integrated Co-Teaching Services	Determined by individual needs (as outlined in IEPs), with a maximum of 12 students with disabilities per class.	Variance may be provided for exceptions.
Resource Room Programs	5 students per instructional group	Total number of students assigned to a resource room shall not exceed 20 students .
Related Services	65 students maximum caseload for speech and language pathologists	Frequency, duration, and location of services shall be outlined in the IEP, based on individual student needs.
Special Classes		
General Special Class	15 students (or 12 students in a State-operated or State-supported school).	For students primarily requiring specialized instruction in a self-contained setting.

¹¹⁰ Pennsylvania State Toolkit. (n.d.). *Special education caseload vs. workload analysis model*. Pennsylvania Speech-Language-Hearing Association. Retrieved from [https://psha.org/pdfs/school-based-toolkit/Special%20Ed%20Caseload%20vs%20Workload_NBI49_Backgrounder_v2%20\(002\).pdf](https://psha.org/pdfs/school-based-toolkit/Special%20Ed%20Caseload%20vs%20Workload_NBI49_Backgrounder_v2%20(002).pdf)

¹¹¹ 200.6 *Continuum of services*. (n.d). govt.westlaw. [https://govt.westlaw.com/nycrr/Document/l09aea522c22211dda1bb852bdc84e3be?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)&bhcp=1](https://govt.westlaw.com/nycrr/Document/l09aea522c22211dda1bb852bdc84e3be?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1)

Special Classes (High Management Needs - General)	12 students , with one or more supplementary school personnel assigned to assist instruction.	For students whose management needs interfere with the instructional process, requiring additional classroom support.
Special Classes (Intensive Needs)	8 students , with one or more supplementary school personnel assigned to assist instruction.	For students requiring significant individualized attention and intervention.
Special Classes (Highly Intensive Needs)	6 students , with one or more supplementary school personnel assigned to assist instruction.	For students requiring a high degree of individualized attention and intervention.
Special Classes (Severe Multiple Disabilities)	12 students maximum. Staff-to-student ratio: 1 staff member per 3 students .	Staff may include teachers, supplementary school personnel, and/or related service providers. Programs focus on habilitation and treatment.

Caseload Ratios

The chart below outlines the student-to-educator ratios mandated by New York State Regulation 8 CRR-NY 200.6 for special education programs within the continuum of services. It highlights the specific class sizes, staffing configurations, and support levels required for various Special Class settings. These guidelines are essential for ensuring that students with disabilities receive appropriate levels of individualized attention and support, based on the intensity of their needs.

Different from the chart above, which provides a broader overview of maximum capacities and staffing across multiple service types, this chart focuses specifically on the detailed staffing configurations for different Special Class models, emphasizing the variations in support levels required for students with differing management and instructional needs. Together, these charts provide complementary perspectives on staffing considerations for school districts in NY State.

EXHIBIT 37. NYSED REGULATION 8 CRR-NY 200.6 STAFF RATIOS FOR SPECIAL CLASSES.

SPECIAL CLASS TYPE	DESCRIPTION
12:1 / 15:1	12:1 for elementary and junior/middle levels in NYC; no more than 12 or 15 students per class depending on level; one full-time Special Education teacher
12:1:1	No more than 12 students per class; one full-time Special Education teacher; one full-time paraprofessional
12:1:4	No more than 12 students per class; one full-time Special Education teacher; one additional staff person (paraprofessional) for every three students
8:1:1	No more than 8 students per class; one full-time Special Education teacher; one full-time paraprofessional
6:1:1	No more than 6 students per class; one full-time Special Education teacher; one full-time paraprofessional

ELEMENTARY SCHOOL SPECIAL EDUCATION TEACHER RATIOS

In reviewing BCSD’s caseloads for elementary special education teachers, the District’s caseloads are lower than NYSED’s mandated caseloads. The Collaborative setting does not have a NYSED mandated teacher caseload and therefore is blank in the table. A summary of findings is listed below.

EXHIBIT 38. ELEMENTARY SCHOOL TEACHER CASELOAD RATIOS

Elementary School Settings	BCSD Teacher Caseloads	Mandated Teacher Caseloads
Consultant Teacher	14.45:1	20:1
12:1:2	9:1	12:1
8:1:3	5:1	8:1
Collaborative	10.3:1	-

MIDDLE SCHOOL SPECIAL EDUCATION TEACHER RATIOS

In reviewing BCSD’s caseloads for middle school special education teachers, the District’s caseloads are at or lower than NYSED mandated caseloads. The NEST and Skills and Support settings do not have NYSED mandated caseloads and therefore are blank in the table. A summary of findings is listed below.

EXHIBIT 39. MIDDLE SCHOOL CASELOAD RATIOS

Middle School Settings	BCSD Teacher Caseloads	Mandated Teacher Caseloads
Integrated Co-Teaching	9.3:1	12:1
12:1:2	10:1	12:1
12:1:1	5:1	12:1
8:1:3	8:1	8:1
Resource Room	10:1	10:1
NEST	5:1	-
Skills and Support	8.3:1	-

HIGH SCHOOL RATIOS

In reviewing BCSD’s caseloads for high school special education teachers, classes with mandated caseload counts were below what is required by NYSED. Transitions, Skills and Support, Senior Support, and Specialized Reading Instruction do not have NYSED mandated teacher caseloads and therefore are blank in the table below. When reviewing these data, it is important to note that some special educators (7 out of 17) at the high school have responsibilities outside the caseload numbers reflected in this chart. These special educators are serving in CT and ICT classrooms, planning for, and providing specially designed instruction for SWDs. A summary of findings is listed below.

EXHIBIT 40. HIGH SCHOOL CASELOAD RATIOS

High School Settings	BCSD Teacher Caseloads	Mandated Teacher Caseloads
Integrated Co-Teaching	7:1	12:1
Resource Room	5:1	10:1
12:1:2	12:1	12:1
Transitions	4:1	-
Skills and Support	9.5:1	-
Senior Support	9.3:1	-
Specialized Reading Instruction (SRI)	17:1	-

An analysis of caseload data across elementary, middle, and high schools suggests that BCSD is not currently exceeding caseload requirements set by NYSED. This finding contrasts with survey responses, where 65% of staff respondents indicate that additional special education teachers are needed to effectively support students with IEPs. However, caseload numbers alone do not provide a complete picture. Caseloads reflect the number of students assigned to staff, while workloads encompass the full range of responsibilities, including direct instruction, indirect/consultation services, assessments, case management, and IEP-related duties. A more detailed workload analysis is essential to gain a deeper understanding of how special education teachers are being utilized across the District and to identify opportunities for optimizing their roles to better support students.

- *65% of staff agree special education teachers at their school are used effectively to support the needs of students with IEPs.*
- *55% of staff agree paraprofessionals at their school are used effectively to support the needs of students with IEPs.*

Staff Survey

A workload analysis is recommended for related service providers to analyze the utility of the Flexible Scheduling Model. This could function as a districtwide initiative to determine whether a caseload or workload is most appropriate in BCSD.

STUDENT TO TEACHER AND PARAPROFESSIONAL RATIOS

PCG conducted an analysis of the ratio of students to teachers and paraprofessionals, with the term paraprofessional representing both Teaching Assistants or Teacher Aides. Districtwide, there is an average of 11 students with disabilities to one special education teacher. In addition, there is an average of fifteen students with disabilities to one paraprofessional. This count is based on full-time equivalent (FTE) staff to students.

A summary of findings, by school, is listed below. There are three classroom aides assigned to specific classrooms at Pound Ridge Elementary School who provide support to students with disabilities in the inclusive setting, as needed. Elementary schools with more Special Classes also have smaller student to teacher ratios.

EXHIBIT 41. 2024-25 STUDENT TO SPECIAL EDUCATION TEACHER RATIOS

School	Student to Special Education Teacher
Bedford Hills Elementary	19:1
Bedford Village Elementary	10:1
Mount Kisco Elementary	14:1
Pound Ridge Elementary	19:1
West Patent Elementary	10:1
Fox Lane Middle School	10:1
Fox Lane High School	12:1

EXHIBIT 42. 2024-25 STUDENTS TO PARAPROFESSIONAL RATIOS

School	Program Aides/Teaching Assistants	12:1:2 Paraprofessionals	8:1:3 Paraprofessionals	1:1 or 2:1 Paraprofessionals
Bedford Hills Elementary	5	N/A	N/A	Building-Based: 3
Bedford Village Elementary	2	N/A	12	Special Class: 2 Building-Based: 8
Mount Kisco Elementary	4	N/A	N/A	Building-Based: 4
Pound Ridge Elementary	3	N/A	N/A	Building-Based: 3
West Patent Elementary	1	8	N/A	Special Class: 10 Building-Based: 6
Fox Lane Middle School	11	2	3	Special Class: 5 Building-Based: 3
Fox Lane High School	9	3	3	Special Class: 3 Building-Based: 4
Hillside Alternative Campus	4	N/A	N/A	N/A

An analysis of staffing data indicates that BCSD does not have a shortage of Teaching Assistants or Aides. However, survey responses reveal that only 55% of staff agree that paraprofessionals are being utilized effectively to support students with IEPs.

A review of the data shows that many paraprofessionals are assigned to 1:1 or 2:1 student support roles, particularly in Special Classes, which are already staffed with Teaching Assistants and a Teacher Aides based on state requirements. In some of these classrooms, additional paraprofessionals have been assigned, resulting in multiple adults supporting students in the same space. Observations made during onsite visits confirmed this trend, as some classrooms had an almost 1:1 or 2:1 staff-to-student ratio due to the number of paraprofessionals present.

At the building level, paraprofessionals assigned to 1:1 or 2:1 roles in inclusive settings also appeared to be in higher numbers than expected. This connects to the IEP review, where it was not always clear why some middle and high school students required this level of support based on the information in their IEPs.

While paraprofessionals play a critical role in supporting instruction, providing behavioral interventions, and assisting with daily living skills, their effectiveness depends on how they are integrated into the school schedule and aligned with student needs. Making sure that paraprofessional assignments are data-driven and based on clearly documented requirements can help optimize their impact across educational settings.

Best practices for paraprofessional utilization emphasize clearly defined roles, targeted professional development, and collaborative planning with special education teachers.¹¹² Effective scheduling allows paraprofessionals to be matched with students or classrooms where their skills and support can maximize outcomes. Onsite visits show effective use of paraprofessionals across most classrooms observed, however, there were instances where this was not observed and may be due to the high number that were observed in some Special Classes. Providing ongoing training on evidence-based strategies equips paraprofessionals to address specific academic, behavioral, and social needs, fostering a more inclusive and effective learning environment.¹¹³ Similarly a workload analysis, rather than caseload numbers alone, is essential to evaluate how Teaching Assistants/Aides are deployed across the District and to identify strategies for optimizing their contributions to student success.

STUDENTS TO RELATED SERVICE PROVIDERS RATIOS

PCG conducted a caseload analysis of students to related service providers. This analysis consisted of counting the caseloads of each related service provider in the District. A summary of findings is listed below.

EXHIBIT 43. 2024-25 ELEMENTARY STUDENT TO RELATED SERVICE PROVIDER RATIOS

Elementary School Related Service	Students to Service Provider
Occupational Therapy	37:1
Physical Therapy	28:1
Speech and Language	32:1

¹¹² Giangreco, M. F., Suter, J. C., & Doyle, M. B. (2023). Revisiting the synergy among values, research, and practice in the utilization of paraprofessionals in inclusive schools. *Research and Practice for Persons with Severe Disabilities*, 48(1), 3–15. <https://doi.org/10.1177/15407969221107047>

Sources

¹¹³ Douglas, S. N., Uitto, D. J., Reinfelds, C. L., & Shuster, B. C. (2016). *The role of the paraprofessional in the inclusive classroom*. *Intervention in School and Clinic*, 51(4), 211–216.

EXHIBIT 44. 2024-25 SECONDARY STUDENT TO RELATED SERVICE PROVIDER RATIOS

Middle School/High School Related Service	Students to Service Provider
Occupational Therapy	35:1
Physical Therapy	33:1
Speech and Language	44:1

A review of caseload data and staff feedback indicates that the current staffing model does not necessarily reflect the need for additional staff but again, highlights the importance of examining workload distribution. The student-to-therapist ratios for occupational therapists (OTs) and physical therapists (PTs) remain consistent across elementary and secondary schools, suggesting stable service provision. However, the speech and language pathologist (SLP) ratios show notable variation, with an average of 32 students per SLP at the elementary level compared to 44 students per SLP at the secondary level. This increase aligns with shifts in service delivery at the secondary level, where interventions are typically group-focused and provided less frequently and for shorter durations. Additionally, a consultative model is often employed at the secondary level to help students avoid missing critical instructional time and effectively generalize skills within the classroom setting.

NYSED mandates a maximum SLP caseload of 65 students, and recent data from the American Speech-Language-Hearing Association (ASHA) indicates that New York consistently reports the lowest SLP caseload ratios nationally, ranging between 30 and 40 students.¹¹⁴ BCSD’s caseloads, apart from the high school, align with these state and national benchmarks. Similarly, caseload data for occupational and physical therapists remain well below both state and national averages. A 2020 study from the *American Journal of Occupational Therapy*¹¹⁵ reported that full-time school-based OTs typically manage caseloads of 41 to 50 students, while a 2007 national assessment¹¹⁶ revealed an average caseload of 42 students per OT and 76 students per PT in New York schools.

➤ 68% of staff agree related service providers at their school are used effectively to support the needs of students with IEPs.

Staff Survey

These findings suggest that while caseload numbers are within acceptable ranges, further analysis of workload demands and scheduling models, particularly the Flexible Support Model, may be necessary to evaluate its effectiveness and confirm that staff resources are utilized to meet student needs efficiently.

STUDENTS TO PSYCHOLOGIST/SOCIAL WORKER RATIO

EXHIBIT 45. 2024-25 STUDENT TO PSYCHOLOGIST/SOCIAL WORKER RATIO

All Schools	Students to Psychologist/Social Worker
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¹¹⁴ American Speech-Language-Hearing Association. (2024). Schools survey report: Caseload and workload characteristics trends, 2000–2024. Retrieved December 9, 2024, from <https://www.asha.org/siteassets/surveys/2024-schools-survey-caseload-characteristics-trends.pdf>

¹¹⁵ Seruya, F. (2020). Caseload and Workload: Current Trends in School-Based Practice Across the United States. ResearchGate. Retrieved December 10, 2024, from https://www.researchgate.net/profile/Francine-Seruya/publication/343515103_Caseload_and_Workload_Current_Trends_in_School-Based_Practice_Across_the_United_States/links/66d5df14fa5e11512c47d4d7/Caseload-and-Workload-Current-Trends-in-School-Based-Practice-Across-the-United-States.pdf

¹¹⁶ Effgen, S. K., Myers, C. T., & Myers, D. (2007). National distribution of physical therapists and occupational therapists serving children with disabilities in educational environments. *Physical Disabilities: Education and Related Services*, 26(1), 47-61. Retrieved December 9, 2024, from <https://files.eric.ed.gov/fulltext/EJ795380.pdf>

Districtwide	15:1
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In BCSD, school psychologists and social workers support a mandated caseload of students with IEPs. They also have caseloads in the respective schools they work in, supporting the general education population as well. Social workers are responsible for drafting the social history summary included in all IEPs. The social history summary is inclusive of academic, developmental, social, and behavioral updates.

School psychologists are active members of the CSE team. Individuals serving in this role gather all supporting documents from school-based team members and complete the CSE referral packet. Psychologists communicate updates regarding an individual student's CSE timeline status to school-based colleagues. Lastly, psychologists play a significant role in the re-evaluation process for students served on IEPs including scheduling and chairing meetings and supporting compliance with regulatory expectations.

BCSD RATIOS COMPARED TO OTHER DISTRICTS

PCG conducted a comparison between BCSD and other districts in New York. This count does below does not include actual caseloads; rather, they are based on full-time equivalent (FTE) staff to students. A summary of the findings is included below.

EXHIBIT 46. 2023-24 COMPARISON BETWEEN NY DISTRICTS – SPECIAL EDUCATION TEACHERS AND TEACHING ASSISTANTS

	Enrollment of SWDs	Special Educators	Teaching Assistants
BCSD	17%	11:1	15:1
District A (NY)	17%	13:1	6:1
District B (NY)	21%	13:1	13:1
District C (NY)	17.8%	17:1	14:1

Based upon the quantitative analysis of BCSD staffing allocations, in comparison to peer districts and NYSED regulations, BCSD is appropriately staffed to meet the needs of students with disabilities. A more nuanced analysis, such as high school special educator caseloads, may indicate a slightly higher workload based on competing priorities and supporting several models on BCSD's continuum (e.g., CT, ICT, SAS). Some study participants believe that caseloads are difficult to manage. Individuals expressing those concerns should work closely with building leadership to analyze their schedule and determine if time can be spent more efficiently. There are sufficient structures in place, such as Flex Week, to allow most related service providers to complete case management in addition to supplemental support. Any further questions raised associated with staffing levels should be redirected into a workload analysis.

Licensure and Qualifications

BCSD maintains all educator licenses, as well as expiration dates, in its human resources information management system, nVision. The District conducts outreach to teachers whose licenses may be expiring to support teachers in maintaining their licensure. This outreach occurs in the fall and the spring.

As part of the BCSD hiring process, all new teachers are required to be licensed. When teacher hiring is approved by the BCSD Board of Education, all pending new hires have their certifications listed in the board documents. Presently, teachers in BCSD have a NY State Initial license. A very small number of staff are working through certification, in partnership with the District, to have requisite testing completed so their status will convert to Initial status upon graduate program completion.

BCSD requires all Teaching Assistants, formerly known as Instructional Assistants, to hold a bachelor's degree and be certified by passing the New York State Assessment of Teaching Assistant Skills. This change was part of the District's decision to transition the role of "Instructional Assistant" into "Teaching Assistant," ensuring a higher standard of qualification, certification and pay. It was reported that all Teaching Assistants meet these requirements.

Retention

BCSD administration has noted that teacher retention is high; this includes special educators. The District attributes this to a competitive salary as well as a four-year induction program for all new teachers; the first two years new hires have a mentor with ongoing professional development throughout the program.

BCSD conducted an internal staffing audit to support compliance with NYSED regulations for individuals serving as Teaching Assistants. As part of this effort, the District implemented a requirement that Teaching Assistants hold a bachelor's degree in addition to meeting state certification requirements by passing the New York State Assessment of Teaching Assistant Skills. This decision reflects the District's commitment to maintaining a highly skilled and qualified workforce, exceeding state requirements to better serve students. While these changes resulted in some staff attrition due to the updated qualifications, they demonstrate the District's focus on fostering a team of well-trained professionals. The high retention rates among Teaching Assistants further highlight the success of this effort, allowing students to benefit from dedicated, knowledgeable, and credentialed support staff. However, it was reported that BCSD does struggle with retaining Teacher Aides, which do not have to meet the same qualifications as Teaching Assistants.

TEACHER RELATIONSHIPS & HIGH-QUALITY PROFESSIONAL LEARNING

One of the key areas to developing an effective special education program is through professional learning. This includes ensuring professional learning meets the needs of staff in their roles, which is different for every district and staff member. Professional learning should include a balance of instructional and special education topics, as this creates a variety of options that supports all students' needs and meets staff at their level of learning in their career.

District Practices

BCSD requires training for new special educators in addition to the various professional development offerings within the District. Several documents provided by BCSD were reviewed as part of this study. The Special Education leadership team developed an action plan for the 2023-2024 school year which outlined goals assessing professional development, specifically in the science of reading. Districtwide professional development areas focused on:

- Literacy for Special Educators
- SPED Leadership and CSE chair duties and responsibilities
- Therapeutic Crisis Intervention for Schools
- Bridges Intervention
- MTSS
- Implementation and Support of Research-Based Curriculum and Programs

- *38% of staff agree professional development offerings they have attended enable them to better support the teaching/learning of students with IEPs.*
- *40% of staff agree they are provided adequate training in communicating with parents of students with disabilities.*
- *62% of staff agree BCSD offers opportunities for growth, additional training, and career advancement.*

Staff Survey

BCSD has placed a significant emphasis on professional development centered around the science of reading. Currently, the District offers six different certifications and training in literacy which include: Wilson Reading System Introductory Course, Level I and II Certification (WRS); Manhattanville College Rose Institute: Orton-Gillingham Learning Pathway – Multisensory Structured Literacy Instruction 1 and 2; and Language Essentials for Teachers of Reading and Spelling (LETRS) Volume 1. Approximately half of the Learning Specialists at BCSD (25 out of 53) have earned their WRS Level 1 Certification, with many others either dually certified or are in the process of becoming certified. This widespread investment in literacy training demonstrates BCSD's commitment to strengthening its reading instruction.

BCSD staff echoed the need for targeted professional development in several key content topics primarily associated with general education:

- High-leverage instructional practices,
- Curriculum differentiation and modification,
- Tiered support implementation and coordination, and
- De-escalation techniques.

Analysis of survey findings aligns with priority areas identified by BCSD staff. Approximately 26% of all survey respondents agreed that general education teachers are given adequate training in effectively supporting students with IEPs, and only 38% of staff agreeing that BCSD has established standards for delivering co-teaching/collaborative instruction.

Collaboration between BCSD staff and parents of students with IEPs should be another area of focus for future professional development priorities. Less than half (40%) of staff agree they have been provided adequate training in communicating with parents of students with disabilities. Most staff agree (85%) that their school is engaged with families of students with disabilities, and 78% of staff agree their school effectively responds to the needs and concerns of families of students with IEPs. This is an opportunity for the Special Education sub-committee to partner with school-based staff to co-create communication strategies in partnership with District leaders.

BCSD's efforts to further professional development has not gone unnoticed as many focus group participants highlighted the Special Education department's ongoing work to provide more opportunities and coaching. The District provides four dedicated professional development opportunities during superintendent conference days, with sessions at the beginning and end of the year and two additional sessions strategically scheduled throughout the school year to support ongoing learning and growth. To make professional development more meaningful, the District has implemented a "choose your own" PD journey, allowing staff to tailor their learning to their individual needs. However, some staff continue to express concerns about limited time for professional development and suggest repurposing District meetings to provide additional learning opportunities. At the same time, leadership faces challenges in expanding PD within the constraints of the school calendar, as many staff are unwilling to participate outside of their scheduled workdays. Finding a balance between meeting professional learning needs and respecting workload concerns requires collaboration between staff and leadership to identify creative and feasible solutions.

LEADERSHIP

One of the main tenets of effective leadership in special education includes shared accountability where leaders guide staff toward a common vision and values and embrace the principle that holding all students to high expectations is the shared responsibility of all. This requires leaders to empower students, staff, parents/families, and the community to share responsibility for teaching, learning, and student outcomes. Shared accountability for student learning is an ongoing and continuous process. Part of shared accountability in effective leadership is team building, in which leaders create a vision for collaboration and partnerships and develop a plan for communicating the vision with staff, families, and the community to support buy-in. This develops trust and open communication among all stakeholders. However, to do this, leaders must celebrate the small wins with their teams and model the norms of collaboration, providing and analyzing data, and presuming positive intentions. This also includes developing structures for professional learning communities and one-on-one check-ins with staff, as needed.

- *55% of staff agree BCSD's special education department effectively responds to the needs and concerns of families of students with IEPs.*
- *42% of staff agree there is effective and consistent communication between their building and BCSD's special education department.*

Staff Survey

District Practices

In reviewing data from surveys and focus groups, perceptions of historical challenges with shared accountability between special education leadership, parents, and staff have emerged, creating noticeable divides in BCSD. Two distinct and conflicting perspectives were identified regarding the provision of special education in the District. Some participants expressed the belief that leadership and Board members prioritize parent concerns beyond reasonable expectations, with parent advocacy efforts exerting disproportionate influence on District priorities and decision-making. Conversely, others shared the perception that parent voices are not adequately prioritized, leaving students with disabilities to face negative consequences due to insufficient advocacy efforts.

Study findings suggest that current District processes and relationships are rooted in good faith and a spirit of collaboration. Parents are recognized as having a significant voice and influence in BCSD, as evidenced by the establishment of a Board sub-committee dedicated exclusively to special education priorities. Transparency in District leadership has improved over time, with many administrators and stakeholders acknowledging the progress made in fostering more collaborative relationships. However, the perspectives shared by parents of students with IEPs during this study remain valid and highlight areas for continued growth in relationship-building efforts.

Stability in special education leadership will be essential to sustaining the progress achieved under the current administration. Since 2015, the District has experienced significant turnover in special education leadership, which has contributed to uncertainty among staff and parents. Moving forward, consistent and steady leadership will be key to building trust and maintaining momentum in strengthening special education programs and relationships within the District.

Special Education Leadership Roles within BCSD

The Office of Special Education has a Director of Special Education who reports directly to the Superintendent. That director has four direct reports: the Assistant Director of Special Education, the Committee on Special Education/Elementary Special Education Coordinator, the Special Class Special Education Coordinator, K-12 and the Assistive Technology Coordinator. The Assistant Director has two direct reports: the Elementary Coordinator of Special Education and the CPSE Coordinator of Special Education. As noted in the earlier section, the Director focuses on students grades 6-12 and the Assistant Director oversees students grades K-5.

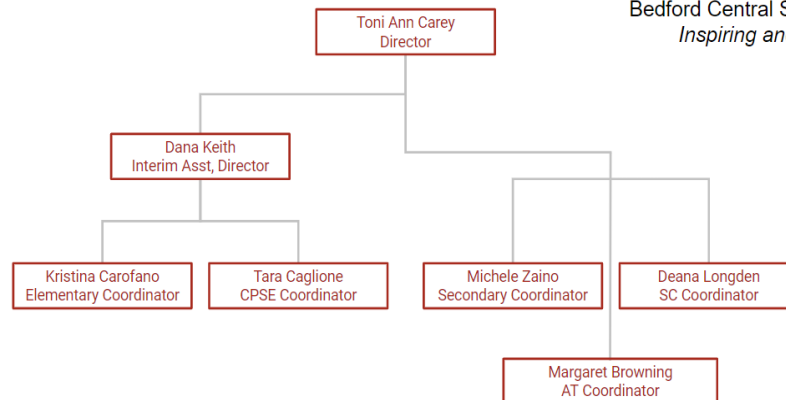
Presently, the Assistant Director of Special Education of Special Education is serving in an interim capacity. Since the 2015-16 school year, there have been six directors of special education.

EXHIBIT 47. 2023-24 SPECIAL EDUCATION DEPARTMENT ORGANIZATIONAL CHART

Admin Team and Supervision



Bedford Central School District
*Inspiring and Challenging
Our Students*



Job Descriptions

PCG reviewed the job descriptions for several special education roles within the District, including the Director and Assistant Director of Special Education, Secondary and Elementary Coordinators, Special Class Coordinator (SC Coordinator), Board Certified Behavioral Analyst, and Assistive Technology Coordinator (AT Coordinator). Our review found that, while most roles were well-documented, only the Director and Assistant Director job descriptions included details about the term of the role and specified which titles report to them. Our review confirmed that all roles have defined responsibilities and contribute meaningfully to the District's special education programs.

The Director and Assistant Director of Special Education roles are integral to the effective management and implementation of special education programs within the District. These 11-month positions, both members of Bedford Administrators and Supervisory Association (BASA), share many responsibilities but differ in their scope and level of authority, with their primary distinction lying in grade-level oversight: the Director focuses on grades 6-12, while the Assistant Director oversees grades K-5. Together, they play critical roles in fostering special education compliance, inclusivity, and collaboration across the District.

The Director of Special Education leads the development, implementation, and evaluation of special education programs for secondary grades, assuming responsibility for high-stakes legal meetings, IEP compliance, and fostering inclusive educational services for grades 6-12. Additionally, the Director manages the special education budget, monitors expenditures, and seeks funding opportunities. As the primary contact for families of secondary students, the Director addresses disputes, organizes workshops, and collaborates with the SEPTO Leadership Group. In comparison, the Assistant Director supports the same goals for grades K-5, aiding in program design, chairing meetings, and promoting inclusive practices for elementary students. The Assistant Director also supervises and evaluates K-5 staff, coordinates professional development, and supports compliance with regulatory requirements, including record audits and reporting.

Both roles require significant collaboration with schools and external agencies, but staff perceptions of this collaboration reveal areas for improvement. Survey data indicate that 55% of staff survey respondents agree the special education department effectively responds to the needs and concerns of families of students with IEPs. However, only 42% of staff agree there is effective and consistent

communication between their school and the special education department, highlighting a potential gap in alignment and coordination. These perceptions likely stem from the complex responsibilities held by the Director and Assistant Director and may vary based on the staff's roles and their direct interactions with leadership.

Staff in direct service roles, such as special education teachers and paraprofessionals, may perceive the department's responsiveness differently than building administrators or related service providers due to their day-to-day responsibilities and proximity to student needs. Effective communication and clarity in roles are particularly crucial in helping staff to feel supported and aligned with District initiatives.

The Director and Assistant Director also play vital roles in crisis intervention and behavior support. The Director develops and implements districtwide positive behavior supports and crisis strategies for students with IEPs, while the Assistant Director focuses on behavior assessments and intervention plans for elementary students. These roles require balancing strategic oversight with responsive support, which is critical to fostering staff confidence and building cohesive relationships between school buildings and the special education department.

A summary of their responsibilities, based on their job descriptions, is provided below.

EXHIBIT 48. 2024-25 DIRECTOR OF SPECIAL EDUCATION AND ASSISTANT DIRECTOR OF SPECIAL EDUCATION ROLE COMPARISON

Category	Director of Special Education	Assistant Director of Special Education
Position Details	11 Month Position, Member of BASA. Oversees grades 6-12.	11 Month Position, Member of BASA. Oversees grades K-5.
Program Development and Implementation	Leads the development, implementation, and evaluation of special education programs. Chairs Initial Eligibility and high-stakes legal meetings for grades 6-12. Oversees IEPs and fosters inclusive education.	Assists in designing, implementing, and evaluating programs. Chairs Initial Eligibility and high-stakes legal meetings for grades K-5. Promotes inclusive education.
Staff Supervision and Development	Supervises, mentors, and evaluates staff for grades 6-12. Plans districtwide professional development and assists in recruiting and training staff.	Supervises and supports staff for grades K-5. Conducts evaluations, coordinates professional development, and assists in recruiting and training staff.
Compliance and Reporting	Supports compliance with all regulations, oversees IEPs, prepares reports, and conducts audits.	Monitors compliance with regulations, audits records, and supports accurate reporting.
Budget and Resource Management	Manages the special education budget, monitors expenditures, and pursues funding opportunities.	Assists in managing the budget, monitors spending, and supports equitable resource distribution.
Family and Community Collaboration	Primary contact for families, organizes workshops, resolves	Liaison for families, facilitates meetings, resolves disputes, and participates in SEPTO meetings.

	disputes, and partners with SEPTO Leadership Group.	
Collaboration with Schools and Outside Agencies	Collaborates with principals, staff, and external agencies. Represents the district in legal matters.	Collaborates with principals, staff, and external agencies. Monitors IESPs for non-district students.
Data Management and Reporting	Analyzes data on student performance and program outcomes. Monitors progress on assessments and supports accurate record-keeping.	Analyzes data on outcomes and services. Assists in enhancing performance on assessments and maintains accurate records.
Crisis Intervention and Behavior Support	Implements positive behavior supports, crisis intervention strategies, and oversees crisis protocols.	Supports behavior assessments and intervention plans. Provides guidance on crisis management and behavior support.

Along with the Director and Assistant Director of Special Education are the Secondary Coordinator of Special Education, the Elementary Coordinator of Special Education, and the CPSE Chairperson roles. The responsibilities for these respective positions share similarities in their districtwide scope and focus on special education, but they differ in their specific responsibilities and the age groups they serve.

All three positions are involved in implementing and evaluating special education programs, supporting compliance with laws and regulations. The Secondary Coordinator supports instructional design and inclusive practices, overseeing elective and course offerings for secondary students. The Elementary Coordinator focuses on K-5 students, coordinating services for those in general education programs. The CPSE Chairperson specializes in Early Intervention and Preschool students, coordinating services and implementing programs for this younger age group.

Key attributes of the jobs include the following from job descriptions provided by the District.

EXHIBIT 49. 2024-25 MS/HS COORDINATOR OF SPECIAL EDUCATION, ELEMENTARY COORDINATOR OF SPECIAL EDUCATION, AND CPSE CHAIRPERSON ROLE COMPARISON FROM JOB DESCRIPTIONS

Category	Secondary Coordinator of Special Education	Elementary Coordinator of Special Education	CPSE Chairperson
Position Details	Districtwide position serving schools; Member of the teachers' association.	Districtwide position serving all five elementary schools; Member of the teachers' association.	Districtwide position serving special education preschool children; Member of the teachers' association.
Program Development and Implementation	Supports instructional design and inclusive practices. Oversees elective/course offerings.	Implements and evaluates special education programs for K-5 students. Ensures compliance with laws and regulations.	Coordinates services for Early Intervention and Preschool students. Implements and evaluates preschool special education programs.

	Provides professional development for building staff.	Coordinates services for students in general education programs.	Ensures compliance with laws and regulations.
Staff Supervision and Development	<p>Participates in hiring processes.</p> <p>Partners with administration for observations and evaluations.</p> <p>Supervises TAs/paraprofessionals, related service providers, and clinicians.</p>	<p>Supervises Special Education teachers K-5 and related service providers.</p> <p>Organizes professional development for special education and general education staff.</p> <p>Trains support staff.</p>	<p>Supervises special education programs for preschool students.</p> <p>Organizes professional development for special education staff, related service providers, and general education teachers K-5.</p>
Compliance and Reporting	<p>Plans, prepares, and runs CSE meetings.</p> <p>Reviews referral packets.</p> <p>Finalizes IEPs for rising 6th to 12th graders.</p>	<p>CSE chairperson for program reviews, re-evaluations, annual reviews, and summer referrals.</p> <p>Ensures development and implementation of IEPs. Proofs and finalizes IEPs.</p>	<p>CPSE chairperson for all types of meetings.</p> <p>Ensures development, implementation, and finalization of IEPs for preschool students.</p>
Family and Community Collaboration	Maintains ongoing communication with parents.	Facilitates communication between parents, teachers, administrators, and external agencies.	<p>Facilitates communication between parents, teachers, administrators, external agencies, and providers.</p> <p>Works with community liaisons to support families with limited English proficiency.</p>
Collaboration with Schools and Outside Agencies	<p>Collaborates with guidance, building admin, and various coordinators.</p> <p>Attends multiple team and department meetings.</p>	<p>Collaborates with BCBA on behavior plans.</p> <p>Partners with MTSS Coordinator and general education staff.</p> <p>Coordinates District of Location cases and services.</p>	<p>Collaborates with BCBA on behavior plans.</p> <p>Partners with MTSS Coordinator.</p> <p>Works with community agencies to support families.</p>
Crisis Intervention and Behavior Support	<p>Provides TCIS Training for staff.</p> <p>Participates in emergency response team activities.</p>	Develops and implements strategies for addressing behavioral and emotional challenges.	Develops and implements strategies for addressing behavioral and emotional challenges.

		Provides guidance and support during crisis situations.	Provides guidance and support during crisis situations for preschool students.
Curriculum and Transition Planning	Reviews curriculum and materials. Coordinates transitions between grade levels and post-graduation.	Models and supports differentiation and pre-referral strategies in tiers 1-3 promoting inclusion for all students.	Assists with transition of classified preschool students to Kindergarten. Ensures consideration of LRE for all preschool special education students.

Assistive Technology (AT) Coordinator (K-12)

The AT Coordinator has a districtwide role responsible for conducting assistive technology evaluations, consultations, and direct services for a caseload of approximately 150 students. This position involves maintaining and managing the inventory of assistive technology devices, tools, and subscriptions, making certain that IEP-mandated items are available and functional. Additionally, the AT Coordinator plays a critical role in professional development, offering training sessions for staff, students, and administrators on assistive technology and accessibility. These training opportunities include faculty meetings, department meetings, districtwide professional development days, and specialized workshops such as Tech Immersion Days and Tech Bootcamps. The AT Coordinator collaborates with leadership to advance district initiatives, oversees vision consultations, and works with building administrators to enhance student access, engagement, and curriculum delivery through the use of assistive technology.

Special Class Coordinator

The Special Class (SC) Coordinator oversees the administration and operation of special education programs, including staffing, curriculum development, and program logistics such as scheduling and space allocation. This role involves close collaboration with transportation services to address program-specific needs, including out-of-district placements and extended school year (ESY) services. A key responsibility is transition planning for students moving between school levels (e.g., Pre-K to Kindergarten, elementary to middle school, middle to high school, and post-graduation).

Additionally, the SC Coordinator partners with administrators in evaluating teachers, related service providers, and classified staff, providing feedback and professional development to enhance instructional and inclusive practices. The position requires ongoing collaboration with building and department administrators to support appropriate staffing, budget management, and material procurement throughout the year. The SC Coordinator leads team meetings for special class staff and related service providers, supports instructional design and inclusive practices, and provides targeted professional development to building staff.

A significant aspect of this role is participation in CSE/CPSE meetings, including planning, preparation, and facilitation of program reviews, re-evaluations, and transfer meetings. The SC Coordinator also works closely with specialized staff such as UDL specialists, behaviorists, and transition specialists to provide comprehensive student support. Responsibilities extend to parent communication, coordination of contracted services (e.g., nursing and behavioral support), and oversight of special class IEPs. The role includes site visits for incoming kindergarten and out-of-district students, collaboration with sending districts for tuition-in cases, and working with school administrators and guidance teams to integrate special class scheduling within the broader master schedule. Additionally, the SC Coordinator manages Superintendent Determinations for Local Diplomas for eligible students.

These positions play essential roles in supporting students with disabilities, enhancing staff capacity, and supporting the effective implementation of specialized programs across the district.

The Evolution of Transparency in Special Education Leadership

The BOE Special Education Subcommittee and the Special Education Parent-Teacher Organization (SEPTO) played an integral role in shaping the scope of this study and has been engaged throughout the process. Regular check-ins with the Special Education Director, Assistant Director, and Superintendent have kept the subcommittee informed of progress and timelines for this report. Additionally, the subcommittee collaborated with the Director to develop an agenda of topics to address during the 2023-24 school year, aiming to advance the District's special education programming and foster greater collaboration across stakeholders during the Director's first year in the role. This approach reflects the leadership's dedication to including all voices—parents, staff, and community members—while actively giving parents in a meaningful role in this process.

While these efforts have been positively received by many, some parents have expressed challenges in fully trusting the new leadership team. Concerns have been raised about the hiring process for the Director, with some feeling their feedback was not fully accounted for. Others have noted ongoing challenges, such as perceived gaps in communication, lack of a clear process for addressing parent concerns, delays in IEP evaluations, insufficient consideration of outside evaluations provided by parents, and the reliance on anecdotal rather than data-driven measures to track student progress. However, many parents also commend the new leadership team for their commitment to change, receptivity to feedback, and dedication to making sure their children receive the services they need.

Staff feedback also offers a nuanced perspective on the new leadership team's impact. Many staff members expressed appreciation for improvements in communication and collaboration, particularly noting the leadership's attentiveness to parent concerns and efforts to enhance the continuum of programming to better support students. These staff members acknowledged a more structured and responsive approach to addressing challenges, which they believe has strengthened the foundation for serving students with disabilities.

At the same time, some staff shared feelings of hesitation about engaging with the leadership team, noting that conversations sometimes felt less collaborative than anticipated. In certain instances, staff perceived responses to their input as discouraging or overly directive, which, for some, has contributed to a reluctance to seek guidance or bring forward concerns. This has created opportunities for further growth in making sure all staff feel their voices are heard and their contributions valued.

Additionally, a portion of staff expressed uncertainty about the leadership team's level of experience in addressing the complexities of special education, given their professional backgrounds. While these perceptions are not universally shared, they underscore the importance of continued communication, transparency, and collaborative problem-solving to build trust and confidence across the team. By fostering an environment of mutual respect and open dialogue, the leadership team can strengthen relationships, reinforce staff morale, and create a culture where all team members feel supported in their efforts to serve students effectively.

Overall, PCG's analysis affirms the transition in leadership has initiated meaningful steps toward strengthening special education programming and fostering collaboration within the District. The feedback gathered underscores the importance of continuing to build trust, improve communication, and make sure both families and staff feel supported and valued in this ongoing process. The publication of a Special Education Action Plan is an effort to improve transparency and accountability.

SUMMARY AND IMPLICATIONS

BCSD maintains special education teacher caseload ratios below state-mandated limits at all school levels, allowing for compliance and better instructional focus. The District also boasts a low student-to-

teacher ratio, with an average of 11 students with disabilities per special education teacher. While these figures suggest a strong staffing foundation, some staff members perceive the District as understaffed for special education. Conducting a workload analysis, alongside the existing caseload approach, could address these concerns by considering the full spectrum of staff responsibilities, such as case management, IEP meetings, and evaluations.

The District's related service provider caseloads align with or fall below state and national averages, with the exception of high school speech and language services. Conversely, the student-to-teaching assistant ratio averages 15:1, which is higher but does not appear to negatively affect outcomes for students. This ratio should also be evaluated within a workload analysis to confirm that resources are equitably allocated to support student needs effectively.

BCSD is appropriately staffed in the District's Special Education department, with clearly defined roles and responsibilities aligned to key priorities, including compliance, collaboration, and program development. Leadership has emphasized inclusive practices, such as implementing the MTSS framework and integrating students with disabilities into general education settings. Sustained collaboration between general education and special education leadership is essential to maintaining high-quality instruction, effective interventions, and specially designed instruction that supports shared instructional outcomes.

The Office of Special Education is structured with a Director of Special Education, who reports to the Superintendent, and an Assistant Director, who reports to the Director. This model effectively distributes responsibilities, with the Director focusing on grades 6-12 and the Assistant Director overseeing grades K-5. However, the primary challenge has been leadership turnover rather than the organizational structure itself. Since the 2015-16 school year, the District has experienced significant attrition, with six Directors and four Assistant Directors of Special Education, including the current Assistant Director serving in an interim capacity. Reducing turnover in these roles is critical to providing consistent leadership and maintaining stability within the department.

The appointment of a new Director of Special Education in July 2023 has marked a new chapter of leadership for the District. The Director's entry plan, released in November 2023, emphasizes stakeholder collaboration as a core priority. The establishment of a Board of Education (BOE) Subcommittee on Special Education and regular engagement with stakeholders further demonstrates the District's commitment to advancing instructional priorities and program improvements.

Despite these efforts, concerns have been raised by parents and staff regarding communication gaps, delays in evaluations, and leadership experience. These concerns highlight the need to rebuild trust through transparency, responsiveness, and proactive relationship-building. Leveraging existing structures, such as the BOE Subcommittee, to balance parent voices with District priorities will be critical in strengthening relationships. Additionally, creating structured opportunities for parents and staff to provide input and collaborate with District leaders will further support the development of strong partnerships and maintain a unified focus on meeting the needs of all students.

VI. SYSTEMS AND STRUCTURES

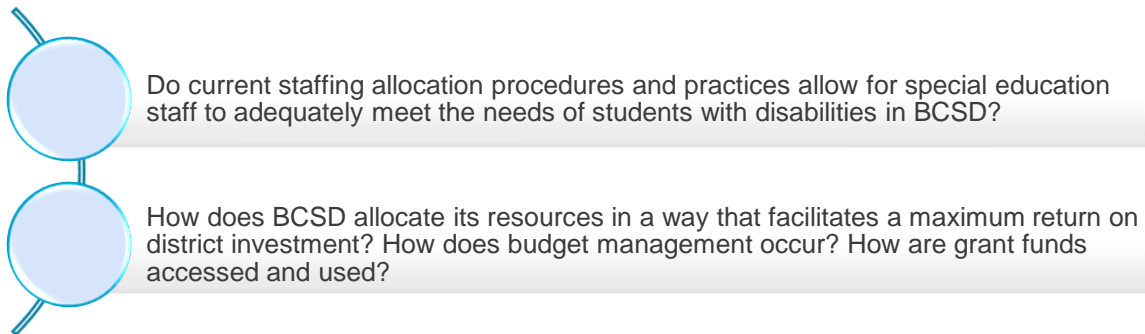
OVERVIEW

This domain in the framework emphasizes the importance of systems and structures within an effective special education system. This includes defining expectations for resource allocation, and equitable funding practices to guide decision-making.

This domain includes the following key areas for effective systems and structures in special education:

- Mission and Vision
- Resource Allocation
- Equitable Funding

The essential questions we answer in this chapter are:



Below are the overarching strengths and opportunities within the Systems and Structures domain of the Special Education Effectiveness Framework.

Strengths	Opportunities for Improvement
<ul style="list-style-type: none"> ➤ School-based Special Education Expenditures. BCSD has shown fiscal stewardship, with special education school based expenditures second lowest among a group of five peer districts. ➤ State Complaints and Due Process. BCSD has not received any state complaints or undergone hearings regarding special education matters in the past three years. ➤ Special Education Action Plan. In SY2023 the Special Education Department developed an Action Plan with clear goals and action steps to support the vision of the Department. 	<ul style="list-style-type: none"> ➤ Standard Operating Procedure Manual. BCSD is currently in the process of developing a Standard Operating Procedure Manual to provide staff with a centralized resource for understanding District policies and procedures, as no such manual is currently available for easy access. ➤ Out-of-District Tuition. BCSD currently spends over \$2 million dollars on OOD placements serving approximately 25 students in OOD programming. ➤ Facilities Planning. Revisiting the facilities review presents an opportunity to assess current building use, explore potential efficiencies, and determine if further analysis on educational adequacy is needed

POLICIES AND PROCEDURES

Effective special education systems require clearly outlined policies and procedures for staff. Clearly outlined policies and procedures form the foundation of a fully functional and transparent special education system within a district. Furthermore, these guidelines provide a roadmap for educators, administrators, families, and stakeholders, ensuring consistency, accountability, and equitable access to services. By clearly defining processes for identification, evaluation, placement, and the delivery of special education services, these policies establish a standardized framework that fosters fairness and clarity for all involved. Transparent policies not only facilitate compliance with legal mandates but also promote open communication, mutual understanding, and collaboration across all stakeholders. They serve as a guiding compass ensuring every student with disabilities receives the support and services they require in an environment that is inclusive and supportive for all.

District Practices

The appointment of the current Director of Special Education in July 2023 marked a new milestone for BCSD's special education programming. Shortly after assuming the role, the Director developed an entry plan, which was published on BCSD's website in November 2023 and is highlighted in the Exhibit below. This plan outlined immediate action items and a clear process for gathering input from stakeholders, demonstrating a commitment to collaboration, transparency, and thoughtful leadership. To further support accountability and transparency, the Director provides regular updates on the progress made in each area of the plan, which are also posted on the website to keep stakeholders and the community informed. As part of these efforts, the District established a Board of Education (BOE) Subcommittee on Special Education following the release of a special education study completed by Hanover Research in 2022. This subcommittee sought to gain a deeper understanding of BCSD's special education system, focusing on programming, the continuum of services, and departmental structures, ultimately leading to the study that informs this report.

- 60% of staff agree BCSD has an overall vision that explicitly addresses the needs of students with disabilities.
- 60% of staff agree BCSD has established goals and an action plan for improving outcomes for students with disabilities.

Staff Survey

EXHIBIT 50. BCSD SPECIAL EDUCATION ACTION PLAN SY2023

LITERACY: To expand research-based literacy practices along our Special Education continuum		
<i>Goal: Ensure alignment of elementary core literacy curriculum with Special Education interventions</i>		
Action Steps	Responsibility	Target
Participate in District Literacy Committee	Director of Special Education, Assistant Director of Special Education	Ongoing- Completed

Review new core curriculum program and align sped reading interventions with the curriculum	Director of Special Education, Assistant Director of Special Education Elementary Coordinator	June 2024- Continuing into Summer
<i>Goal: Assess professional development (PD) needs K-12 in science of reading (SOR) and plan opportunities</i>		
Gather information/survey of current training received by SPED teachers	Director of Special Education	November 2023- Completed
Plan 24-25 PD for K-5 teachers	Assistant Director of Special Education Elementary Coordinator	January 2024- Completed
Plan 24-25 SOR professional development for 6-12 teachers	Director of Special Education Secondary Coordinator	January 2024- provided during Supt. Conf, Day in April 2024
Plan and provide initial SOR PD for secondary teachers	Director of Special Education Secondary Coordinator	April 2024- completed
Plan and provide reading evaluation and analysis for 6-12 teachers	Director of Special Education Secondary Coordinator	June 2024- completed
<i>Goal: Align Special Class 8:1:3 Literacy curriculum across K-12</i>		
Create a study group to explore the Comprehensive Literacy for All (Erickson & Koppenhaver) approach to instructing students to read and write incorporating AAC	Special Class Coordinator, AT Coordinator, 8:1:3 Special Class teachers, OTs, and SLPs	September 2023- February 2024- completed
Budget for curriculum materials for all 8:1:3 classes	Special Class Coordinator, AT Coordinator, 8:1:3 Special Class teachers, OTs, and SLPs	January 2024- completed
Pilot Comprehensive Literacy for All in all 8:1:3 classrooms	8:1:3 Special Class Teachers OTs and SLPs	September 2024- completed

Review literacy data from the pilot to determine effectiveness	Director of Special Education Special Class Coordinator	February 2025-ongoing
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Math: Align and expand math opportunities and interventions across the Special Education Continuum		
<i>Goal: Increase targeted instruction, intervention and assessment for K–5 mathematics skills and concepts</i>		
Action Steps	Responsibility	Target
Provide professional development for Bridges Interventions support and implementation through monthly meetings	District Math Coach Elementary Coordinator of Special Education	December 2023- and April 2024- provided at Supt. Conf. Day in April 2024
Identify Bridges modules that best align with skills for IEP goals and progress monitoring	District Math Coach Elementary Coordinator of Special Education	June 2024
Learning specialists will collaborate with general education classroom teachers in planning interventions to match and support classroom instruction	District Math Coach Elementary Coordinator of Special Education	June 2024- ongoing
Create a data collection system to utilize modules/assessments in supporting progress monitoring	District Math Coach Elementary Coordinator of Special Education	June 2024- ongoing
<i>Goal: Align math materials and interventions 6-8</i>		
Review programmatic materials being used for math intervention	Secondary Coordinator	February 2024- Completed
Create an inventory of math interventions to be used 6-8	Secondary Coordinator	June 2024- ongoing

<i>Goal: Align student supports to meet the needs of all Special Education students across a range of math courses offered at FLHS</i>		
Collaborate with math department to be sure student placements and supports are aligned	Secondary Coordinator Director of Special Education	June 2024- Completed
Learning specialists will collaborate with general education classroom teachers in planning interventions to match and support classroom instruction	Secondary Coordinator	June 2024- Completed

Parent Communication: Improve communication to ensure regular and transparent interactions with all parents.		
<i>Goal: Ensure appropriate translation services are offered</i>		
Action Steps	Responsibility	Target
Utilize Lexikeet for on-demand verbal translation needs	Special Education Dept	Begin January 2024- Completed
Provide translated evaluations, IEPs and other parent communication as needed	Special Education Dept	January 2024- Completed
<i>Goal: Clarify and communicate CSE process to parents</i>		
Meet with building principals to ensure that parent referrals are processed correctly and in a timely manner	Director of Special Education	September 2023- Completed
Special Education Admin contact all parents personally when receiving an initial parent referral	Director of Special Education, Assistant Director of Special Education	September 2023- June 2024- Completed
Create a parent friendly agenda that can be sent home prior to an initial meeting to better prepare parents	Director of Special Education, Assistant Director of Special Education	January 2024

	Coordinators	
Create a reference document to be given to parents after classification that explains and defines annual review, reevaluation, IEP progress reports etc.	Director of Special Education, Assistant Director of Special Education Coordinators	January 2024- in process
<i>Goal: Provide clear information regarding available programming (continuum of services)</i>		
Create and post a visual representation of the continuum on the website	Director of Special Education, Assistant Director of Special Education Coordinators	January 2024
Provide parent friendly definitions of programs on the website	Director of Special Education, Assistant Director of Special Education Coordinators	January 2024
Create a glossary of educational jargon and definitions on the website	Director of Special Education, Assistant Director of Special Education Coordinators	Summer 2024
Host a parent night for CSPE families transitioning into CSE to discuss continuum	CPSE Coordinator Elementary Coordinator Asst. Director of Special Education	February 2024- Completed
Host a parent night to discuss 5th-6th grade transition/continuum	Director of Special Education Secondary Coordinator AP of FLMS	February 2024- Completed
Host a parent night to discuss 8th-9th grade transition/continuum	Director of Special Education	February 2024- Completed

	Secondary Coordinator AP of FLHS	
Host a parent night to discuss post-secondary transition	Director of Special Education Transition Specialist	February 2024- Completed
<i>Goal: Create a supportive parent-teacher community</i>		
Partner with SEPTO to increase parent participation	Director of Special Education Asst. Director of Special Education	September 2023- June 2024- Completed
Partner with SEPTO to increase the parent member pool	Director of Special Education Asst. Director of Special Education	September 2023- June 2024- In process

Inclusion: Advance inclusive systems of support for students		
<i>Goal: Create and deploy an Accessibility Team to ensure inclusive opportunities for students</i>		
Action Steps	Responsibility	Target
Create an Accessibility Team to explore inclusivity within our schools and school community events	Director of Special Education	August 2023- Completed
Create guidelines for expected accessibility	Director of Special Education, Members of Accessibility Team	January 2024- Completed
Share guidelines with stakeholders (PTOs, Athletic Director, Principals, APs, and other groups running events for our school community)	Director of Special Education, Members of Accessibility Team	January 2024- Completed
Create a Mobile Fox Den kit that can be used at events	Director of Special Education, Members of Accessibility Team	June 2024- in process

Meet with stakeholders for feedback	Director of Special Education, Members of Accessibility Team	June 2024- in process
<i>Goal: Explore opening a Best Buddies Club Chapter at FLMS</i>		
Meet with FLMS AP to discuss new club process	Director of Special Education	November 2023- Completed
Meet with Best Buddies International representative	Director of Special Education	January 2024- Completed
<i>Goal: Create a shared understanding of co-teach/cts (special education and general education collaborative teaching) among stakeholders</i>		
Identify and plan PD for special education and general education staff together to increase knowledge and shared understanding of co-teaching.	Assistant Superintendent of Curriculum and Instruction, Director of Special Education,	January 2024- in process
Identify and plan PD related to student needs (accessible curriculum, adapting on the fly/differentiation, classroom management,)	Director of Special Education	January 2024- in process
Establish collaborative meeting times for teams to plan (lesson design and delivery)	Assistant Superintendent of Curriculum and Instruction, Director of Special Education, Building Principals	March 2024- in process
Create co-teach guidelines to implement best practices	Director of Special Education, Special Education Coordinators	June 2024- deferred to September

STANDARD OPERATING PROCEDURES

Standard Operating Procedure Manuals (SOPMs) play a critical role in supporting the consistent and effective implementation of special education policies and processes across districts. They provide clear guidance to staff, promote accountability, and help maintain compliance with state and federal regulations. Currently, BCSD does not have a comprehensive SOPM for special education. However, it was reported that the Special Education Department is actively working on its development, which represents a positive step toward addressing this gap.

While a full SOPM is not yet in place, the District has developed several valuable resources that can serve as a foundation. For example, there is a detailed policy and procedure document specifically for IEP progress reporting. This document is both comprehensive and well-structured, clearly outlining the steps necessary to support consistency and compliance with this process. Additionally, the District maintains a dedicated website focused solely on IEP development, as discussed earlier in this report.

These existing resources demonstrate the District's commitment to providing clear guidance to staff and should serve as a model for the development of a comprehensive SOPM. Once completed, the SOPM should be made easily accessible to all staff and accompanied by thorough training to support its effective implementation across the District. This will further support consistency, compliance, and high-quality service delivery in special education.

BUDGET MANAGEMENT

According to information gathered from a data request, the initial Special Education General Fund budget is established in coordination with Special Education senior leadership. To account for the unforeseen variables inherent in each school year of operations, contingencies are incorporated into the initial budget. This allows for flexibility in responding to unexpected challenges or opportunities that may arise during the academic year.

Information gathered from a data request noted that on a day-to-day basis, the budget is managed through coordination between the Special Education support staff and the Assistant Business Manager in the Business office. This includes overseeing purchase orders, transfers between accounts, and monitoring outplacement cost trends. For a broader perspective, the global view of the Special Education budget is managed through regular monthly meetings between the Special Education Director and the Assistant Superintendent for Business.

Program Costs

NYSED publishes district Financial Transparency Reports on its website, which include a detailed breakdown of per-pupil expenditures by district.¹¹⁷ Within these reports, special education expenditures are presented as a subset expenditure by program area, further divided into 'school-based expenditures' and district-specific 'central expenditures.'

EXHIBIT 51. 2022-23 SPECIAL EDUCATION EXPENDITURE COMPARISONS

	Special Education School Based Expenditures	Students with Disabilities
Katonah-Lewisboro UFSD	\$32,505.77	437
Lakeland CSD	\$28,241.77	889
Chappaqua CSD	\$26,121.31	386
Bedford CSD	\$26,110.70	574
Yorktown CSD	\$19,601.82	602

PCG conducted an analysis of the most recent data (2022-23) for special education expenditures in five Westchester County School Districts¹¹⁸: Katonah-Lewisboro UFSD, Lakeland CSD, Chappaqua CSD, Bedford CSD, and Yorktown CSD. The review encompassed special education school-based expenditures. When examining special education expenditures as a portion of total per-pupil expenditures, BCSD emerged as the second lowest among the five districts in terms of Special Education School Based Expenditures, with \$26,110.70 per pupil by program area. Overall, there was a difference

¹¹⁷ New York State Education Department. (n.d.). Expenditure data. <https://data.nysed.gov/expenditures.php?year=2023&instid=800000035721>

¹¹⁸ All four districts are located in Westchester County, NY, have between 437 and 602 students with disabilities, and are rated as Local Support and Improvement (LSI) by NYSED.

of more than \$15,000 per pupil by program area between the highest and lowest districts, showing BCSD's expenditures to be consistent with the comparison districts in Westchester County. Variances in per pupil spending within and outside of BCSD related special education programming was not included as part of this analysis. A deeper analysis of the 2022-23SY BCSD Financial Transparency Report expenditures highlighted a more significant high-cost area, tuition costs ("other tuition"). The final section of the report details "other exclusions" (expenditures) not included in the per pupil expenditure calculations. BCSD spent over \$2,000,000 during the 2022-2023SY in the "other tuition" category.¹¹⁹

OUT OF DISTRICT PROGRAMS

In the 2023-24 school year, BCSD allocated significant financial resources to out-of-district (OOD) placements. Currently 25 students (approximately 4%) are served in OOD placements in BCSD. The expenditures included \$681,134 for tuition at OOD schools, \$119,664 for tuition at special act schools, and \$1,277,089 for tuition and services at BOCES schools. In total, BCSD spent \$2,077,887 on tuition for OOD programming, along with an additional \$230,600 on contracted services for students not attending in-district schools. These figures highlight the substantial portion of the budget dedicated to supporting OOD placements.

Given the significant financial impact of OOD placements, it is crucial for BCSD to closely examine these expenditures to confirm that students are effectively transitioning through the continuum of services. While the overall percentage of outplaced students with disabilities in New York averages 4.5%¹²⁰ and BCSD is not exceeding that, the District should continue to monitor these numbers. By thoroughly assessing how students move through this continuum, the District can identify opportunities to enhance its in-district programs, allowing for more students to be educated within the community and reducing reliance on external placements when possible. This approach not only has the potential to improve educational outcomes for students but also to reallocate funding back into the District, creating a more sustainable financial model. Addressing the development of in-district services could lead to more efficient use of resources while still meeting the diverse needs of all students.

For context, research shows that many districts face challenges with OOD placements due to the specialized needs of certain students and the associated costs. According to the U.S. Department of Education, OOD placements often constitute a significant financial burden for districts, as they can represent a major portion of the special education budget.¹²¹ By strategically investing in the development of in-district services, BCSD can enhance its ability to provide a comprehensive range of supports locally, benefiting both students and the District's financial stability.

EXTENDED SCHOOL YEAR

BCSD has Extended School Year (ESY) programming for students who require ESY per their IEP. BCSD also has its OOD students attending ESY programming at their respective schools. Extended school year program costs for the 2024-25 school year are \$776,467.35.

SPECIAL EDUCATION LEGAL COSTS

School districts routinely retain outside legal counsel to support special education operations. This includes consultations with the Special Education Director as well as representing the District on matters related to settlements. In the 2023-24 school year, BCSD incurred \$30,176 in legal fees specific to special education from their legal support team.

¹¹⁹ New York State Education Department. (n.d.). Expenditure data.
<https://data.nysed.gov/expenditures.php?year=2023&instid=800000035721>

¹²⁰ U.S. Department of Education. (n.d.). *45th annual report to Congress on the implementation of the Individuals with Disabilities Education Act*. <https://sites.ed.gov/idea/files/45th-arc-for-idea.pdf>

¹²¹ U.S. Department of Education. (2022). *Annual report to Congress on the implementation of the Individuals with Disabilities Education Act (IDEA)*.

STATE COMPLAINTS

A state complaint is a written signed statement of an allegation that a local or state agency has violated a requirement of federal or NY State law. If a parent or individual believes a violation has occurred, they may submit a written complaint to the New York State Education Department (NYSED) for its investigation. For the 2022-23, 2023-24 and 2024-25 school years, there were no state complaints in BCSD.

DUE PROCESS HEARINGS

A due process hearing is a formal process to resolve disagreements between a parent of a student with a disability and a school district. A parent or a school district may submit a written, due process complaint notice requesting an impartial hearing on any matter relating to a proposal or a refusal to initiate or change the identification, evaluation, or educational placement of a student with a disability or a student suspected of having a disability, or the provision of a free appropriate public education to such student under the Individuals with Disabilities Education Act (IDEA).

For the 2022-23, 2023-24 and 2024-25 school years, the school district has not been involved in any special education due process hearings.

REVIEW OF SETTLEMENTS

Special education settlements are agreements between schools and parents to resolve disputes related to special education services, typically to avoid costly due process hearings and to collaborate with families. These settlements may include waiver of claims and may impact the dispute resolution process. In the 2023-24 school year, there were a total of ten settlements. Settlements were predominately agreements from tuition reimbursement at out-of-district schools.

In the table below, total settlement amounts for special education are listed.

EXHIBIT 52. SETTLEMENT AMOUNTS FOR SPECIAL EDUCATION 2019-22 TO 2023-24

School Year	Amount Paid
2019-2020	\$804,235.86
2020-2021	\$226,823.95
2021-2022	\$618,315.00
2022-2023	\$793,448.50
2023-2024	\$511,779.50

Resource allocation and equitable funding practices are not inhibiting the successful provision of special education services in BCSD. The systems and structures in the District, as detailed in this chapter, represent commitment to providing extensive programming to meet diverse needs. There is no evidence to support that students with disabilities are prevented from being provided appropriate placement or compensatory services based upon the financial analysis of District spending. BCSD District leadership should capitalize on this strong foundation and prioritize on building collaboration. Data driven decision-making for students further supports the District’s position to expand upon the continuum in District to support more students and subsequently reduce settlement costs.

Facilities

In the 2018-2019 school year, the SES Study Team, LLC conducted a facilities review to evaluate whether BCSD’s current school configuration effectively supported student programming. The study

revealed significant unused capacity across schools and projected a continued decline in enrollment, prompting concerns about the sustainability of maintaining all existing buildings. Although the District ultimately chose not to consolidate schools at the time, the findings provided a strong rationale for considering this option. Now, six years later, District leadership has expressed concerns that the decision to keep all schools open may be limiting the ability to deliver programming effectively and efficiently.

The 2018-19 study assessed four key areas: space utilization, enrollment trends, leadership priorities, and instructional resource allocation. Each school was analyzed to determine how instructional spaces and support services were being used, while projections based on live birth rates and historical trends indicated a likely decline in student enrollment. Leadership interviews provided insight into both short- and long-term objectives for programming within existing facilities, and site visits examined scheduling patterns and the use of instructional resources, including support staff.

The findings highlighted the following:

- Elementary schools had between 25.8% and 40% unused student capacity, with available space in all five schools.
- The middle school had 35% unused capacity, and the high school had 20%.
- Enrollment projections indicated a continued decline, reinforcing concerns that BCSD was operating more facilities than necessary.

Given this data, the report recommended that the District consider closing one to two elementary schools and consolidating students into the remaining buildings. The rationale was that reducing the number of buildings could lower operational costs while expanding programming opportunities. However, despite the study's recommendations, the District opted not to move forward with consolidation.

Now, as leadership looks toward the future, the concerns raised in the initial study remain relevant. Recent focus groups have highlighted a growing recognition among stakeholders that the District's current configuration presents challenges in resource allocation and programmatic support. Participants across various backgrounds noted that redistributing students across fewer elementary schools could allow for more effective programming.

One of the most pressing considerations is special education. The breadth of facilities that are not being fully utilized has contributed to special education services being spread across multiple schools rather than being more readily available within each school. As a result, some students must leave their home school to receive specialized services at a different location. Reducing the number of underutilized facilities could allow for more consistent availability of programs within each school, limiting the need for students to transition to other buildings to access the support they require. This could be particularly beneficial for Integrated Co-Teaching (ICT), making this model more accessible within students' home schools at the elementary level where it currently does not exist.

Beyond special education, research on school consolidation suggests that economies of scale can lead to lower per-pupil costs while simultaneously expanding educational opportunities.¹²² Larger, consolidated schools often offer more diverse programming and specialized support services, which may not be feasible in smaller, separate schools with fewer students and staff. Additionally, more efficient use of resources could allow the District to redirect funding toward strengthening instructional programs rather than maintaining underutilized facilities.

With the District's leadership team committed to carefully weighing the potential advantages and challenges of school consolidation, it may be time to revisit the findings from 2018-2019 and determine

¹²² Ibid.

whether projections have remained accurate or if enrollment has declined further. A data-driven reassessment should focus on:

- Current enrollment data to evaluate whether the District's capacity needs have changed.
- Financial and programmatic implications to explore whether consolidating schools would allow for expanded educational opportunities and improved resource allocation.
- Stakeholder engagement to ensure transparent communication and informed decision-making.

While school consolidation is a complex and sensitive topic, it presents an opportunity for long-term sustainability and stronger educational programming. By reassessing the data and engaging the community in meaningful discussions, BCSD can make informed decisions that best serve its students, staff, and broader school community.

SUMMARY AND IMPLICATIONS

BCSD is the second lowest among five peer districts in Westchester County for special education school-based expenditures. The District should be lauded for providing quality special education programming in a fiscally prudent manner.

BCSD sends approximately 25 students (4%) to out-of-district (OOD) programs. In the 2023-24 school year, there were 10 students at out-of-district schools; 3 students at special act schools; and 12 students at BOCES schools. Students in all schools ranged from elementary school grades through post graduate programming. Most of these placements are in or near Westchester County, providing students an education as close to home as possible. However, the District should continue to carefully monitor the number of students receiving services in OOD placements to identify opportunities to bring some students back to the District as they refine their continuum of services and supports.

For the 2022-23, 2023-24 and 2024-25 school years, BCSD has faced no open state complaints and has not been involved in any special education hearings. Over recent years, the District's annual settlement amounts have fluctuated significantly, peaking at \$804,235 in the 2019-20 school year and reaching a low of \$226,823 in the 2020-21 school year. Most of these settlements pertain to tuition reimbursement for students attending non-state-approved out-of-district schools, typically arising when parents unilaterally place their child in an external program and subsequently seek reimbursement for that placement.

A 2018-2019 facilities review identified significant unused capacity across BCSD's schools, with enrollment projections indicating a continued decline. While the District chose not to pursue consolidation at the time, the findings suggested that maintaining all current buildings could create challenges in resource allocation and programmatic support. Data from this review has reinforced concerns that the current school configuration may limit the ability to provide equitable access to services, particularly in special education, where students often need to leave their home schools to access necessary programming. The distribution of students across underutilized facilities has also raised questions about the efficiency of staffing and instructional resources. It is recommended the District reassess its facilities and enrollment trends, as the findings from the 2018-19 facilities review provide important context for considering how space utilization impacts the delivery of educational programs.

VII. FAMILY AND COMMUNITY ENGAGEMENT

OVERVIEW

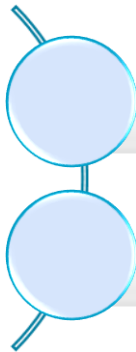
This section of the framework focuses on family and community engagement as part of a high-performing system that includes all stakeholders in the education process by embracing partnerships to make informed decisions and provide equitable opportunities for all students.

This domain includes the following key areas for effective family and community engagement in special education:

- Parent Voice, Collaboration, and Trust
- Language Accessibility
- Parent Training and Resources

A focus on these areas fosters partnerships between students, staff, and families and creates a cohesive system focused on student-centered learning and outcomes. This section of the report summarizes findings from BCSD families from focus groups and survey responses.

The essential questions we answer in this chapter include:



To what extent are the parents of children with IEPs satisfied with their child's special education program?

How do community relations and customer service function specific to supporting families as meaningful participants in the special education process?

Parents are a child's first teachers and are important partners as their children progress through school. Their vital role is acknowledged in IDEA, which requires parental input in writing IEPs, the provision of related services, and placement. IDEA also requires collaboration with parents and students with disabilities, as appropriate, to design special education along with related and supplementary services. As part of this review, the parent's role and satisfaction with special education processes and instructional/service delivery within BCSD were evaluated.

Below are the overarching strengths and opportunities for improvement for the Family and Community Engagement domain of the Special Education Effectiveness framework.

Strengths	Opportunities for Improvement
<ul style="list-style-type: none"> • Parent Participation in IEP Meetings. Survey data show high percentages of parents report feeling heard and supported during IEP meetings, with 86% comfortable asking questions and 85% agreeing their input is considered. • Proactive Measures. The introduction of parent-focused resources, such as letters from the Director and agendas for CSE 	<ul style="list-style-type: none"> • Trust-Building. Some parents express lingering mistrust regarding special education programming and leadership in BCSD. • Communication Consistency. Some parents reported gaps in consistent communication, especially outside formal

<p>meetings, demonstrates a commitment to increasing transparency.</p> <ul style="list-style-type: none"> • Engagement Efforts. Sensory-inclusive events and leadership outreach, including the Accessibility Team, have been positively received. • Interpretation Services. Most non-English speaking parents feel adequately supported during IEP meetings through interpretation services. • Parent Training Development. The District has collaborated with SEPTO to create targeted resources and training opportunities for parents. 	<p>meetings, hinder parents' ability to stay informed</p> <ul style="list-style-type: none"> • Staffing Concerns. Parents perceive BCSD has insufficient numbers of special educators, related service providers, and paraprofessionals to meet IEP needs effectively. • Translated Documents. Inconsistent translation of IEP documents which limit full participation for multilingual families. • Satisfaction with IEP Services. Currently, 65% of parents in BCSD are satisfied with their child's overall special education services. • Progress Monitoring. Some families report BCSD does not provide meaningful data to support student progress and growth. • Parent Training Awareness. Over half of parents are unaware of training opportunities, signaling a need for better outreach and alignment with parent interests.
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PARENT VOICE, COLLABORATION, AND TRUST

Developing strong communication and collaboration with families of students with disabilities is essential for improving student outcomes and fostering a positive, transparent educational experience. Research indicates that when districts establish open and consistent communication with families, it enhances parents' understanding of the IEP process and increases their involvement in decision-making, which directly benefits students.¹²³ Effective collaboration between families and schools leads to more personalized and appropriate supports for students, which results in improved academic achievement, social-emotional development, and overall school success.¹²⁴ Clear, consistent communication builds trust, helping families feel valued and more engaged in their child's educational journey.

- 85% of parents agree their input is considered at IEP meetings.
- 86% of parents feel comfortable asking questions at IEP meetings.
- 74% of parents feel their child's teacher communicates well with them.
- 84% of parents feel teachers respond to their concerns in a reasonable amount of time
- 77% of parents feel they have a good working relationship with their child's teacher.

Parent Survey

¹²³ Fish, W. W. (2020). Parents and special education: What they expect from school and how collaboration improves outcomes. Journal of Special Education Leadership.

¹²⁴ Ibid.

Furthermore, strong family-school partnerships reduce misunderstandings and conflicts, leading to fewer due process complaints and more efficient resolution of concerns. One study found that when parents feel heard and involved in their child's education, disputes are less likely to escalate to formal complaints, as there is mutual trust and transparency throughout the IEP process.¹²⁵ This collaborative dynamic not only strengthens relationships between parents and educators but also contributes to better student outcomes and greater stakeholder engagement. By prioritizing communication and collaboration, districts can create a more inclusive, supportive environment for students with disabilities, ensuring that all parties are working together to meet the student's needs.

District Practices

In years past, relationships between District leadership and families of students with disabilities have been marked by challenges with trust and collaboration. Episodes of mistrust, culminating in incidents that required legal action and resulted in the termination of certain staff members, have left lasting scars within the community. For many parents, these experiences have profoundly impacted their present perceptions of BCSD's commitment to supporting students with disabilities. Some parents continue to feel that their voices are overlooked and that communication from the District lacks the openness and honesty they believe is essential for authentic partnership.

Recognizing this legacy within special education, District leaders have worked diligently to rebuild trust and strengthen relationships with families. Initiatives have been introduced to foster open dialogue, create channels for feedback, and make certain parents feel their perspectives are valued in decision-making processes. Despite these efforts, the journey toward reconciliation remains complex. For some parents, moving forward can feel like an invitation to overlook or minimize past experiences that remain painful and significant. For them, reminders to "move forward" lead to feelings of invalidation, as though the impact of past events is being dismissed rather than understood.

The challenge, then, lies in finding common ground. As the District continues to make genuine strides in improving transparency and accountability, a shared commitment to student-centered goals is essential.

- *61% of parents agree general education and special education teachers work together to support the implementation of their child's IEP.*
- *65% of parents are satisfied with their child's overall special education services.*
- *63% of parents agree transitions from grade-to-grade and school-to-school are collaborative and seamless.*

Parent Survey

Healing past wounds and establishing strong, collaborative partnerships will require sensitivity and sustained effort from both families, staff, and District leaders. Building an inclusive, trusting environment that honors the experiences of all parties is crucial to creating a future that prioritizes and supports the success of students with disabilities. Our data analysis from parent focus groups and surveys indicates positive trends in strengthening relationships between families and the district. While some parents still express concerns, the number of dissatisfied parents appears to be decreasing under the new leadership team. This suggests that recent efforts to improve communication, transparency, and responsiveness to parent concerns are making a meaningful impact in developing greater trust and collaboration.

¹²⁵ Mueller, T. G., & Carranza, F. D. (2019). The importance of family-school collaboration in special education: Building trust and transparency for improved outcomes. *International Journal of Special Education*.

The recent parent survey results reveal a generally positive sentiment regarding communication and collaboration at the school level, with 85% of parents agreeing that their input is considered at IEP meetings and 86% feeling comfortable asking questions in these settings. To support families, BCSD provides parents with a letter and agenda for initial CSE meetings that explains the process and overview of what to expect during CSE meetings to help parents navigate the process. The process of sending this letter and agenda started in September 2023 to further bridge communication with parents. Additionally, 74% of parents feel that their child's teacher communicates well with them, 84% believe teachers respond to concerns in a timely manner, and 77% feel they have a good working relationship with their child's teacher. These metrics suggest that most parents appreciate the responsiveness and accessibility of school staff.

However, feedback from focus groups and open-ended survey responses provides a more nuanced perspective, highlighting areas where some parents feel significant gaps persist. Common themes include concerns about not feeling heard or included in decision-making processes and frustrations about having to navigate complex systems independently to secure services for their children. Additionally, these parents expressed the need to proactively initiate communication with the District to stay informed about their child's progress, citing challenges with inconsistent communication and unclear processes for addressing concerns.

Despite these challenges, there is recognition of recent improvements from these families in engagement efforts from the new special education leadership team. Several parents noted that leadership has made efforts over the past year to connect with families by offering informational sessions on District programs and creating more inclusive environments at events, such as adding a sensory area at Fox Night. While most parents have experienced proactive and accessible support from educators, there is a smaller subset who feel that communication across special education, general education, and administration needs to be more cohesive. This feedback highlights the importance of maintaining strong and consistent communication practices that foster trust and help all parents feel supported and included in their child's educational experience. While the District has already taken steps in this area, a small subgroup of parents continues to express the need for further improvements in communication and collaboration.

Survey and focus group data reveal mixed perceptions regarding progress monitoring for students with disabilities and the overall support for special education within the District. While most parents—79%—agree that their child's IEP explains how progress will be measured, and 78% agree that they receive progress reports on their child's IEP goals, focus group participants shared concerns about progress monitoring practices. Some expressed frustrations with the lack of meaningful data used to track and communicate student progress, both in CSE meetings and in progress reports. This sentiment aligns with our team's findings during the review of IEP progress reports, which often lacked clear and objective data about student growth in progress reports. This discrepancy between survey data and focus group feedback suggests that while parents may acknowledge receiving progress reports, the quality and utility of these reports leave room for improvement.

- *80% of parents agree the leadership team sets a welcoming and positive tone in their school.*
- *62% of parents agree the leadership team does everything possible to support special education in their school.*
- *71% of parents agree their child's special education teacher(s) have high expectations for their child.*
- *63% of parents agree their child's general education teacher(s) have high expectations for their child.*

Parent Survey

Parents also provided mixed feedback about the role of school leadership in supporting students with disabilities. While 80% of survey respondents agree that school leaders set a welcoming and positive tone, only 62% believe these leaders do everything possible to support special education in their child's school. This gap points to a potential disconnect between creating an inclusive environment and implementing concrete actions to address the needs of students with disabilities. Additionally, only 71% of parents agree that their child's special education teacher has high expectations for their child, and this number drops to 63% for parent survey respondents regarding general education teachers. These figures present an opportunity for improvement, as research consistently demonstrates that high expectations are a critical factor in student success, particularly for students with disabilities. Presuming competence and maintaining high expectations are foundational to supporting students in accessing opportunities to reach their full potential.¹²⁶

- *79% of parents agree their child's IEP explains how progress will be measured.*
- *78% of parents agree they receive reports on their child's progress toward meeting their IEP goals.*

Parent Survey

Focus group participants also highlighted challenges in staff maintaining high expectations and accountability for student progress. Parents expressed concerns that without robust data to measure growth, it is difficult to determine whether students are on track to achieve their goals. They emphasized the need for staff to demonstrate a stronger commitment to using data-driven practices in both special education and general education settings to support high expectations for all students.

These findings underscore the need for BCSD to strengthen its approach to progress monitoring and communication with families. Enhancing the quality of progress reports and the use of data in CSE meetings can build greater transparency and trust with families. Furthermore, professional development for educators, focusing on maintaining high expectations and presuming competence, can help provide students with disabilities equitable opportunities to succeed. By addressing these areas, the District can better align its practices with the values of inclusion, accountability, and student-centered support.

Survey data indicates concerns among parents regarding staffing levels and the effective implementation of IEPs. Only half of parent survey respondents (50%) agree that there are enough special educators to implement their child's IEP consistently, and the percentages are even lower for other key support roles. Just 44% of parents agree there are enough related service providers, while only 41% feel there are sufficient paraprofessionals to meet their child's needs. Additionally, less than half (47%) of parents believe that paraprofessional support is used appropriately to help their child at school.

- *50% of parents agree there are enough special educators to implement their child's IEP with consistency.*
- *44% of parents agree there are enough related service providers to implement their child's IEP with consistency.*
- *41% of parents agree there are enough paraprofessionals to implement their child's IEP with consistency.*
- *47% of parents agree paraprofessional support is used appropriately to support their child at school.*

Parent Survey

¹²⁶ Jorgensen, C. (2018). Presuming Competence: The Key to Supporting Students with Disabilities. *Inclusion Press*.

While some parents in focus groups expressed concerns about inconsistent service delivery due to staffing shortages or changes, this perspective was not shared by all participants. A smaller subset of parents reported experiencing gaps in specialized instruction and related services such as speech or occupational therapy, which they viewed as barriers to achieving IEP goals. Additionally, some parents raised concerns about the role of paraprofessionals, feeling they were sometimes relied upon as substitutes for direct instruction or therapy rather than serving as complementary support.

However, an analysis of staffing within BCSD does not indicate widespread shortages. The ratios of special educators and related service providers appear manageable, and the District has relatively low staff attrition and few vacancies to fill. This contrasts with challenges seen in other districts that struggle with staffing shortages in special education. While individual experiences may vary, the data suggests that BCSD has a stable special education workforce, though ongoing efforts to strengthen communication with families about service delivery may help address lingering concerns.

LANGUAGE ACCESSIBILITY

Ensuring equitable access to special education services for families who do not speak English as a first language is both a moral imperative and a legal requirement under the IDEA. The law mandates that districts provide parents with translated special education documents to support their full participation in their child's educational planning. Despite these requirements, survey data suggests gaps in practice that may hinder some families' access to critical supports.

According to the survey, 13% of responding parents indicated their child was receiving English Language Learner (ELL) services. Given this is a small sample of parents, results should be interpreted with caution and may not represent the experiences of all families. While most of these responding parents—81%—expressed satisfaction with ESOL services, a few voiced concerns. One parent highlighted insufficient time allocated for ESOL instruction, and another reported that their child was not receiving these services due to staffing shortages, specifically the District's inability to hire a bilingual paraprofessional to support their child. These accounts underscore the challenges some families face in accessing the full scope of ELL services their children are entitled to and highlight the importance of addressing systemic barriers, such as staffing, to improve service delivery and build trust with families of multilingual students.

Parents who require interpretation services for IEP meetings generally view the District's efforts in this area positively as reported in survey data. According to survey responses, 12% of parents indicated a need for an interpreter, and all these parents (100%) report being asked whether they required these services and express satisfaction with the interpretation provided. However, focus group discussions reveal a more complex picture than what survey data show. Participants highlight a need for District communications to be consistently accessible in multiple languages and report concerns about interpreters not always being qualified or sufficiently familiar with special education terminology, making it difficult for non-English-speaking families to fully engage in the CSE process.

- *93% of parents who required an interpreter at IEP meetings were provided one.*
- *100% of parents who had an interpreter at IEP meetings felt the interpretation services provided helped them understand the information that was discussed.*
- *86% of parents reported receiving a translated IEP if they required it.*

Parent Survey

A few parents have shared concerns that, while the District has recently begun translating IEP documents with fidelity over the last couple of years, these translations are not always accurate, creating additional barriers to accessibility. Focus group feedback also highlighted gaps in communication and engagement with non-English-speaking families outside of CSE meetings. These families expressed frustration with the lack of accessible communication about District initiatives and events, which limits their ability to stay informed and engaged.

The District has made progress in developing translation systems that were not in place a few years ago, demonstrating a commitment to improving language accessibility for families. However, survey data indicate that some challenges remain. In particular, 14% of parent survey respondents

reported that they either did not receive translated IEP documents or were unsure if they had been provided. While the District has implemented systems to support translation, inconsistencies in IEP document translation still present barriers for some families. For those who do not speak English as their first language, these challenges can make it more difficult to fully understand and engage with their child's educational plan. This is particularly important given the requirements under the IDEA, which mandate that all essential special education documents be translated for families who need them.¹²⁷ Failure to meet this requirement not only risks non-compliance but also undermines efforts to foster meaningful parent engagement, which is critical for supporting students' educational success.

Additionally, a few bilingual parents raised concerns about the District's efforts to engage bilingual families meaningfully. These parents feel there are limited opportunities to participate in advocacy groups or community events in ways that empower them to have a voice in special education matters. This lack of inclusion left these families feeling disconnected from the broader educational community and uncertain about how to advocate for their children effectively.

These mixed results suggest that while the District has made progress in providing interpreters during meetings and translating IEP documents, there is room for improvement in how the District communicates and engages with bilingual families across all aspects of their child's education.

PARENT TRAINING AND RESOURCES

Survey data highlights mixed results regarding parent awareness and participation in special education trainings offered by BCSD. Fifty-five percent of parents report they were unsure or unaware about opportunities the District provides for training related to special education. Of the parents who are aware of these sessions, only 30% report attending them, with just 59% of those attendees finding the trainings helpful. This suggests that many parents may not perceive these opportunities as accessible, relevant, or valuable enough to prioritize participation.

Parents who did attend these sessions mostly learned about them through communication with staff members, such as teachers or school psychologists, or via Parent Square. This reliance on a limited set of communication channels could explain why so many families remain unaware of available trainings. Additionally, the low attendance rate among parents who are aware of these sessions indicates the need to better align training topics with family needs and interests.

¹²⁷ U.S. Department of Education. (n.d.). *Individuals with Disabilities Education Act (IDEA)*. <https://sites.ed.gov/idea>

Even though SEPTO has supported the District in identifying areas for parent training, these findings present an opportunity for BCSD to improve its outreach and engagement efforts. By identifying specific areas of interest for families, the District can develop training opportunities that feel more meaningful and practical for navigating the complexities of special education and the resources available to support their children. Expanding communication strategies to include more diverse methods of outreach in multiple languages, as well as proactively seeking parent input on training topics, can help bridge the gap in awareness and participation. Building stronger connections with families through accessible and relevant training is a key step toward empowering them to advocate for their children effectively.

Below is a list of trainings and resources the District has provided to families over the last couple of years under its new leadership team:

EXHIBIT 53. BCSD PARENT TRAININGS AND COMMUNICATIONS

Training/Resource	Topic(s)	Languages
Spring Symposium - 2024	<ul style="list-style-type: none"> • Socialization Goals and Opportunities • Phonemic Fun: Activities for Fostering Early Literacy • Playful Pathways • Summer Sweat • Ways to Promote Family Togetherness • Opening Worlds Through Reading: Toolkit for Enhancing Literacy • Transition Journey Through High School • Using Visuals to Create a Summer Routine • Fun in the Sun: Keeping Motor Skills Growing 	<ul style="list-style-type: none"> • English • Spanish
Updates from the Director	<ul style="list-style-type: none"> • Winter Update • Welcome Letter for Parents 8/14/23 • Welcome Back 2024 • Summer Update • Fall Letter (2024) • Parent Meet and Greet • Parent Coffee dates • IEP Trainings – (led by school psychologists) 	

Additionally, the District updated the special education website to correct any inaccuracies or outdated information. As part of this, BCSD provided their continuum of services on their website so that parents and the community could see the LRE continuum available within the District.¹²⁸

SUMMARY AND IMPLICATIONS

Developing robust communication and collaboration with families of students with disabilities is crucial for enhancing student outcomes and fostering a positive and transparent educational experience. Research

¹²⁸ Bedford Central School District (n.d.) *Student supports by grade level*. <https://www.bcsdny.org/departments/special-education/committee-on-special-education/student-supports-by-grade-level>

underscores the importance of open, consistent communication, which not only helps parents navigate the IEP process but also encourages their active involvement in decision-making. This partnership enhances the quality of support for students, leading to improved academic and social-emotional outcomes.

In the context of BCSD, the parent survey results reveal positive trends in communication at the school level; 85% of parents feel their input is considered during IEP meetings, and 84% report that teachers respond to concerns in a timely manner. Recent initiatives, such as providing a letter and agenda for initial CSE meetings, demonstrate BCSD's commitment to supporting families through greater clarity and accessibility in the IEP process.

Over the past couple of years, the new leadership team has been actively working to rebuild trust with families and strengthen these partnerships. By implementing structured communication strategies and making concerted efforts to engage parents in meaningful ways, they have taken significant steps toward improving relationships between families and the District. While challenges remain, and some parents continue to express concerns, the data from this study indicate that the District is on the right path. Leadership recognizes that there is still work to be done and remains committed to further strengthening partnerships with all families, so that every parent feels heard, valued, and supported in their child's education.

Feedback from focus groups and open-ended survey responses provide insight into the challenges that require attention. A smaller subset of parents express concerns about insufficient communication from the District, citing instances where they feel ignored or compelled to take the lead in advocating for their child. These parents shared frustrations with the quality of progress monitoring and reporting on IEP goals, noting that reports often lack actionable or meaningful data about student growth. These sentiments point to gaps in transparency and accountability that hinder trust and engagement, despite efforts by BCSD leadership to improve relationships with families. Additionally, survey data highlights perceived staffing shortages in special education services, with concerns about inconsistent service delivery and inappropriate reliance on paraprofessionals. As noted previously in this chapter, our analysis does not reveal a staffing shortage in BCSD, therefore, this perception may be more largely based on how staff are utilized in the District as opposed to the number of staff.

BCSD has made strides in supporting families who require language accessibility. Survey data indicates that interpretation services during IEP meetings are generally well-received, reflecting the District's progress in establishing systems for interpretation and translation that were not in place a few years ago. However, a small subset of parents noted challenges remain in achieving accurate and consistent translation of IEP documents and other critical communications, suggesting a need for continued refinement of these systems to fully meet the needs of all families. These parents also highlight the need for greater inclusion in advocacy opportunities and community events, emphasizing the importance of fostering connections that empower bilingual families to advocate for their children effectively.

Finally, participation in District-provided training sessions on special education remains limited. Only 30% of parents aware of these opportunities report attending, and just over half of attendees find them helpful. This indicates a need for better alignment between training topics and parent needs, as well as more effective communication strategies to raise awareness. Despite these challenges, BCSD has taken proactive steps, such as updating its special education website, collaborating with SEPTO to include parent voice in resource development and communication, and increasing bilingual resources to support families. By addressing these areas of concern and continuing to build on existing strengths, BCSD can create a more inclusive, trusting environment that enhances outcomes for students with disabilities.

VIII. RECOMMENDATIONS

PCG was contracted to provide an objective view of the special education program in BCSD and has identified in this report both strengths and areas of improvement that require focus in the coming years. PCG saw ample evidence that BCSD has a solid foundation on which to build. BCSD has many notable strengths, including its commitment to inclusive practices for students with disabilities and its willingness to undertake this review and act on the recommendations as part of a continuous improvement cycle.

The recommendations listed below serve as a roadmap to address areas of improvement, leading to the future growth of the special education program. Each is interrelated and will require significant investment on the part of BCSD and its stakeholders. 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.

LEARNING ENVIRONMENT AND SPECIALIZED SERVICES

1. Multi-Tiered System of Supports (MTSS)

Recommendation 1.1: Standardize the expectations for MTSS practices in one guiding document differentiated by grade band.

Action Steps:

- **MTSS Procedure Manual.** Create a universal, step-by-step, procedure manual for the districtwide MTSS framework that clearly delineates each structure and process.
- **Elementary MTSS Teams.** Refine the functioning of elementary MTSS and various intervention teams to enhance efficiency and clarity.
- **UDL Implementation.** Identify if and how the District wants to continue the implementation of UDL for consistency of practice across all schools.

Recommendation 1.2: Prioritize the implementation of social-emotional and behavioral practices within the MTSS framework.

Action Steps:

- **MTSS Behavioral Supports and Interventions.** Adhere to the timelines set forth and garner staff feedback in the adoption and implementation of social emotional and behavioral MTSS practices.

2. IEP Development and Transition Planning

Recommendation 2.1: Improve the quality and consistency of IEP writing across the District.

Action Steps:

- **IEP Development Rubric.** Develop a rubric for quality IEP writing, focusing on measurable goals, appropriate accommodations, and alignment with student needs and include with the current staff website for IEP development.

- **Training and Coaching.** Provide ongoing training and coaching for case managers and staff responsible for IEP development.
- **IEP Peer-Review Process/Auditing.** Strengthen the peer-review process or administrative review to enhance IEP quality and consistency.

Recommendation 2.2: Align transition-aged student programming with individualized Transition Plans.

Action Steps:

- **Review Transition Programming and Plans.** Conduct a review of current transition programming and compare it to Transition Plans to identify gaps.
- **Training and Coaching.** Provide training and ongoing coaching for staff on creating meaningful, individualized Transition Plans aligned with student strengths and postsecondary goals.
- **Peer-Review Process for Transition Plans.** Implement a peer-review process or administrative review to enhance Transition Plan quality and consistency.

3. Progress Reports and Monitoring

Recommendation 3.1: Establish clear progress monitoring guidelines for all staff to promote accurate and objective reporting.

Action Steps:

- **Districtwide Progress Monitoring Tools.** Create and disseminate districtwide progress monitoring tools and templates.
- **Staff Training and Coaching.** Train staff on collecting and reporting data to track student progress toward annual IEP goals.
- **Progress Report Audits.** Conduct periodic audits of progress reports to maintain compliance and uphold data quality.

4. English Language Learner Services and Dually Identified Students

Recommendation 4.1: Align supports and services for dually identified students with best practices.

Action Steps:

- **Professional Development.** Offer professional development on best practices for serving dually identified students.
- **Dually Identified Framework.** Develop a districtwide framework to align English Language Learner (ELL) and special education services, allowing them to complement each other.
- **Progress Monitoring.** Monitor and evaluate student outcomes to assess the effectiveness of services.

5. LRE Continuum and Programming

Integrated Co-Teaching (ICT) at Elementary Level

Recommendation 5.1: Develop and pilot an Integrated Co-Teaching (ICT) model at the elementary level to enhance inclusive practices and provide access to grade-level instruction for all students.

Action Steps:

- **Needs Assessment.** Conduct a Needs Assessment and identify schools and grade levels for piloting the ICT model based on student and staff needs.
- **ICT Pilot Program at Elementary.** Develop a Pilot Plan and create a timeline, goals, and criteria for selecting pilot classrooms.
- **Training and Coaching.** Train teachers and provide professional development on co-teaching strategies and collaborative planning.
- **Collaborative Structures.** Build upon the current Action Plan for collaboration time and allocate regular planning time for co-teachers consistently across schools.
- **Progress Monitoring.** Monitor implementation and collect data on student progress and teacher feedback to evaluate success. Use findings to improve and scale ICT to other elementary schools as appropriate.

Behavioral Supports and Programming

Recommendation 5.2: Expand behavioral programming to meet the needs of students with behavioral challenges at the elementary level.

Action Steps:

- **Behavioral Supports and Programming at Elementary Level.** Develop additional behavioral support programs, such as tiered intervention systems or specialized supports, at elementary schools that are similar to what is offered at the secondary level.
- **Training and Coaching.** Provide training for staff on evidence-based behavioral strategies across all grades and schools in BCSD. This includes training for all staff, including general education staff, on functional behavior assessments (FBAs) and implementation of Behavior Intervention Plans (BIPs).
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- **Evaluate Staffing for Behavioral Supports.** Evaluate staffing needs and maintain the availability of highly trained staff to support students with behavioral challenges across all schools. Assess whether current staffing levels effectively meet student needs.

Support and Skills Class (SAS)

Recommendation 5.4: Enhance consistency in instruction and effective practices in SAS classes.

Action Steps:

- **Staff Instructional Guide.** Develop districtwide guidance and priorities for SAS classes.
- **Training and Coaching.** Provide targeted professional development and coaching for SAS teachers on guidance and priorities.

- **Observation and Feedback.** Conduct regular observations and feedback sessions to maintain fidelity of implementation.

Specially Designed Instruction, Accommodations, and Modifications

Recommendation 5.5: Equip all staff to consistently implement Specially Designed Instruction (SDI), accommodations, and modifications across all settings in the LRE continuum.

Action Steps:

- **Professional Development and Training.** Create targeted professional development on implementing SDI, accommodations, and modifications effectively for general and special education staff.
- **Training and Coaching.** Provide ongoing training for general and special education staff to build shared understanding and skills.
- **Staff Tools and Resources.** Develop easy-to-use guides and tools for staff to reference in classrooms on SDI, accommodations, and modifications.
- **Classroom Observations.** Have leadership teams and coaches conduct classroom observations to promote the consistent use of SDI and supports. Offer staff actionable feedback and coaching to refine practices.

LEADERSHIP AND HUMAN CAPITAL

6. Flexible Support Model and Master Scheduling

Recommendation 6.1: Evaluate the effectiveness of the Flexible Support Model (FSM) and Master Scheduling across the District to promote consistent scheduling practices across BCSD.

Action Steps:

- **Workload Analysis of Related Service Providers and FSM.** Conduct a workload analysis of related service provider (RSP) caseloads to determine appropriate use of FSM.
- **Evaluate Flex Week Practices.** Observe and assess Flex Week practices across schools to identify inconsistencies, barriers, and best practices. Use this data to pinpoint where adjustments can improve outcomes for students and staff.
- **Guidance on Flex Week.** Develop clear guidelines and expectations for how Flex Week should be utilized and hold staff accountable to these guidelines.
- **Alternative Models.** Consider transitioning to an annual service minutes model if Flex Week does not meet its intended goals or other evidence-based frameworks to meet student needs.

Recommendation 6.2: Continue to evaluate and refine Master Scheduling practices to establish consistent approaches across BCSD, prioritizing effective and equitable delivery of services.

Action Steps

- **Continue Master Scheduling Audit.** Collaborate with the subject matter expert currently supporting the District to address districtwide scheduling concerns for students with disabilities. Focus on identifying and resolving systemic issues, such as scheduling overlaps, missed services, or inefficiencies, that may hinder the delivery of high-quality services.

- **Form Stakeholder Group and Solicit Feedback.** Incorporate stakeholder feedback by engaging RSPs, administrators, and families to gather insights into challenges and opportunities related to current scheduling practices. Use this feedback to inform revisions to the FSM and master scheduling process.
- **Training and Resources.** Provide ongoing training and resources for master scheduling to equip school leaders and staff with tools and resources to implement effective scheduling practices that align with District expectations. Focus on aligning schedules to provide students with timely, high-quality services and reduce missed opportunities for support.

7. Conduct a Comprehensive Workload Analysis

Recommendation 7.1: Conduct a workload analysis to gain a deeper understanding of staff responsibilities by examining the tasks and time commitments beyond student caseload numbers. This approach will help address concerns about perceived understaffing and provide equitable resource allocation to meet student needs.

Action Steps:

- **Workload Analysis for All Special Education Staff.** Engage staff, including teachers and related service providers, in a districtwide workload analysis to assess the full scope of responsibilities beyond caseload numbers.
- **Reassess Distribution of Staff.** Use the findings to inform staffing decisions, providing equitable distribution of resources and addressing perceptions of understaffing.
- **Workload/Caseload Framework.** Develop a framework for ongoing workload evaluations to adapt staffing models as needs evolve.

8. Strengthen Collaboration Across General and Special Education

Recommendation 8.1: Develop stronger collaborative structures between general and special education to monitor inclusive educational services and high-quality instruction for all students. By promoting shared ownership of student outcomes, BCSD can advance the work already started for MTSS and special education programming.

Action Steps:

- **Professional Development.** Offer joint professional development opportunities focused on inclusive teaching strategies, accessible curriculum design, and co-teaching models.
- **Cross-Departmental Teams.** Establish cross-departmental teams to identify and address systemic barriers to inclusion, such as scheduling conflicts or curriculum alignment challenges.
- **Assess Student Outcomes.** Regularly evaluate the impact of collaborative initiatives on student outcomes, collecting and analyzing data to make informed adjustments as needed
- **Celebrate and Model Successes.** Recognize and celebrate successful collaboration efforts to encourage a culture of shared responsibility and continuous improvement.

SYSTEMS AND STRUCTURES

9. Special Education Department Job Descriptions and Turnover

Recommendation 9.1: Format job descriptions in a manner whereby they are consistently written and formatted for internal and external audiences.

Action Steps:

- **Reformat and Revise.** Reformat and, if need be, revise Special Education Department job descriptions so they are consistent and clearly formatted.

Recommendation 9.2: Create necessary conditions to retain Director and Assistant Director of Special Education.

Action Steps:

- **Identify Root Causes of Turnover.** Acknowledge root causes of turnover and address the underlying causes of turnover while creating supportive conditions for these leaders.
- **Celebrate Successes.** Celebrate successes and regularly acknowledge the contributions and successes of special education leaders.
- **Team-Building.** Encourage open communication and foster a supportive team environment that encourages open communication between District level leadership and staff across schools.

10. Reassess Facilities Review to Align with Current District Needs and Long-Term Planning

Recommendation 10.1: Revisit the facilities review to determine the next steps for long-term planning

Action Steps:

- **Reevaluate Findings from the Previous Facilities Review.** Conduct a detailed reassessment of the most recent facilities review to determine if its findings remain relevant given current enrollment trends, programmatic needs, and resource allocation. Identify any gaps in the initial analysis that may warrant further study, particularly regarding the educational adequacy of existing buildings.
- **Determine the Need for an Educational Adequacy Assessment.** Assess whether additional analysis is needed to evaluate how well current school facilities support instructional programming, specialized services, accessibility, and long-term District goals. This assessment should focus on confirming that any potential consolidation, including that of Pound Ridge Elementary School, enhances educational opportunities for students rather than limiting them.
- **Establish a Long-Range Action Planning Committee (LRPAC).** Form a committee consisting of District leaders, board members, staff, parents, and community stakeholders to guide the next steps in facility planning. This group will review updated data, explore options for optimizing facility use, and engage in transparent discussions about potential impacts.
- **Engage Community Stakeholders.** Facilitate community forums, staff meetings, and parent discussions to gather input and address concerns. Clearly communicate the purpose of revisiting the facilities review and involve stakeholders in shaping possible solutions to promote broad support and understanding.

- **Develop a Framework for Next Steps.** Based on the findings from the reassessment and community engagement process, outline a phased approach for addressing facility needs. If further analysis is warranted, define the scope, timeline, and key areas of focus to support well-informed decisions that align with District priorities.

FAMILY AND COMMUNITY ENGAGEMENT

11. Enhance Progress Monitoring and Data Utilization

Recommendation 11.1: Develop clear and consistent progress monitoring practices to provide actionable insights into student growth and improve educational outcomes, helping parents understand their child's progress toward IEP goals.

Action Steps:

- **Develop Clear Guidelines:** Create and disseminate districtwide standards for writing progress reports that provide specific, measurable, and actionable information on student growth.
- **Train Educators:** Offer professional development for staff on data-driven practices, including goal setting, progress monitoring, and communicating student outcomes effectively to parents.
- **Implement Oversight Systems:** Establish regular reviews of progress reports to maintain compliance with District guidelines and provide feedback to educators.

12. Increase Communication Consistency

Recommendation 12.1: Standardize communication protocols to foster clarity, timeliness, and effectiveness in interactions among schools, families, and District offices.

Action Steps:

- **Standardize Communication Protocols:** Develop clear expectations for timely communication and consistent communication between schools, families, and District offices, including regular updates on student progress and program changes.
- **Centralize Family Contact Information:** Create a centralized communication platform to manage parent inquiries, track responses, and support follow-through by relevant staff.
- **Empower Families:** Provide resources such as guides or FAQs to help families understand District policies and know whom to contact for specific concerns.

13. Improve Accessibility

Recommendation 13.1: Strengthen accessibility for parents whose first language is not English to allow for equitable understanding of special education services and processes.

Action Steps:

- **Monitor Translation Systems.** Continually monitor the current translation systems within the District to maintain accuracy and consistency in the translation of IEPs and other essential documents, providing all parents access to special education materials in their first language.
- **Build Bilingual Resources:** Expand the availability of bilingual materials and guides to support parents' understanding of the special education process, making them accessible on digital platforms.
- **Improve Outreach:** Use diverse communication methods, in multiple languages, including social media, newsletters, and school-level outreach, to inform families about available training opportunities and find ways to increase engagement with bilingual families.

14. Rebuild Trust with Families and the Community

Recommendation 14.1: Foster trust and strengthen partnerships with families and the community through transparency, active listening, and collaboration.

Action Steps:

- **Acknowledge Past Challenges:** Transparently address the history of mistrust with families and the community. Demonstrate an understanding of their concerns by sharing specific steps the District is taking to improve practices and communication
- **Engage in Active Listening:** Host listening sessions with a neutral party or conduct surveys to gather input from families, making sure their voices are heard and valued in the decision-making process. Act on the feedback received to demonstrate the District's commitment to addressing their needs and concerns.
- **Celebrate Collaborative Successes:** Highlight the role of the new leadership team in prioritizing trust-building and collaboration with families by sharing stories of successful partnerships with families and community members, showcasing the positive impact of their contributions. Recognize family and community leaders who have supported the District's improvement efforts.

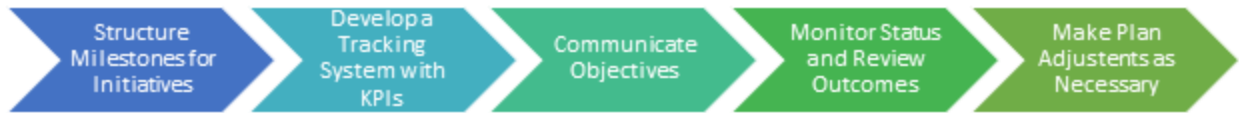
FROM STRATEGY TO EXECUTION

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 sustainable structure, 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 BCSD address each component of our Strategy Execution Process to position the district to make lasting and impactful changes.

EXHIBIT 54. PCG's STRATEGY EXECUTION PROCESS



Structure Milestones for Initiatives

Action plans must include concrete, measurable milestones that can be assessed regularly. 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 BCSD would like to move these critical initiatives forward. At a minimum, given the nature of the initiatives, progress toward milestones should be reviewed monthly through the 2025-26 and 2026-27 school years.

Develop a Tracking System with KPIs

Key Performance Indicators (KPIs) must be established for each measurable milestone. Reviewing these KPIs will help BCSD assess where each initiative stands. By monitoring these KPIs frequently, BCSD 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 ensure 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 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

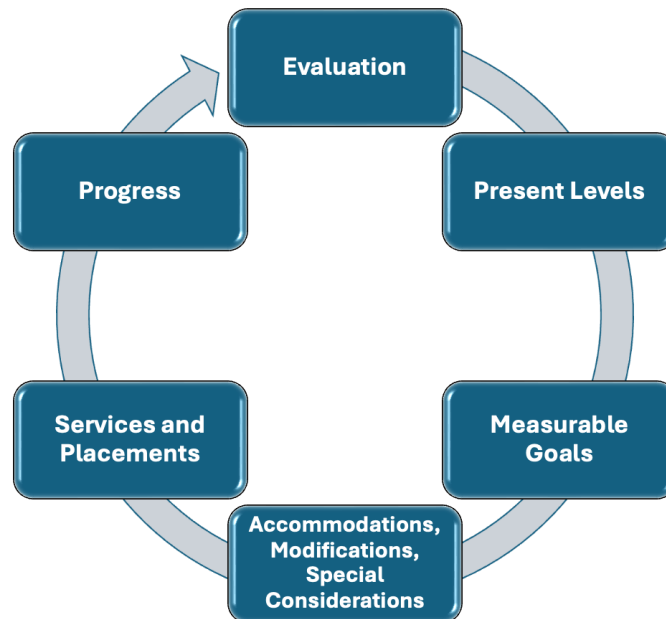
An action plan is not an unchangeable document. It is a fluid plan that should be revised and updated as the BCSD environment changes and grows. Openness to revising the action plans will enable BCSD to adjust to shifting fiscal and regulatory realities as well as changing priorities. If BCSD’s core 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.

IX. APPENDIX

GOLDEN THREAD FRAMEWORK

For a student with a disability, his or her 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.

EXHIBIT 55. 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 students’ access, participation, and progress in the general education curriculum and address a student’s other disability-related needs.¹²⁹
- PCG used six overarching quality indicators to assess files. The rubric included specific elements and classifications of evidence under each indicator.

EXHIBIT 56. PCG’S GOLDEN THREAD EVIDENCE RUBRIC

<p>Evaluation</p>	<ul style="list-style-type: none"> • The evaluations used to assess the student are comprehensive, reliable, and culturally and linguistically responsive and help to determine the unique needs of the student in all areas of suspected disability. • The evaluations consider the student’s developmental and educational history, general education performance, sociological and health factors, and any additional sources of data that support the findings in the evaluation. • The evaluations specifically state how the manifestations of the disability interact with environmental and instructional barriers to access, participation, and/or progress in the general education curriculum. • The evaluation includes information from the family, such as student strengths, preferences, interests, health, behavior in
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¹²⁹ Golden Thread Protocol

	settings outside of school, changes in the home environment, outside services, community activities, etc.
Present Levels	<ul style="list-style-type: none"> • The PLAAFP includes observable and measurable baseline data from multiple sources that identify the student’s strengths and critical areas of need. • In the PLAAFP there is evidence of all team members’ input, including parents/caregivers. • The PLAAFP reflects the strengths and critical areas of need in the enrolled grade-level curriculum and functional areas if needed (i.e., communication, behavior, social skills, self-help skills) • If the student is dually identified, there is evidence that ELL services and supports have been considered and/or included in the IEP, including transition services, where appropriate. • For transition-age students, the PLAAFP includes key areas of transition planning (i.e., training, education, employment, independent living, etc.)
Measurable Annual Goals	<ul style="list-style-type: none"> • IEP goals and objectives are: Specific, Measurable, Achievable, Relevant, and Time Specific (SMART) • IEP goals are driven by grade-level curriculum and aligned to standards. • If objectives are included with the goal, the objectives are aligned and targeted to support the student’s progress toward the annual goal. • The student’s IEP clearly states how progress will be monitored and how often parents will receive progress reports. • IEP goals and objectives directly connect specially designed instruction with areas that need to be taught for the student to make progress in the general education curriculum.
Accommodations, Modifications, and Special Considerations	<ul style="list-style-type: none"> • The IEP includes explicit accommodations, modifications, and/or supports that directly connect with the student’s disability-related needs. • The IEP specifically includes supports, such as consultation, professional learning, or indirect supports that are needed for school personnel to effectively implement the IEP. • The IEP provides specific details on how and to what degree accommodations, assistive technology, and/or AAC will be used to support access to the general education curriculum. • The accommodations and modifications in the IEP align to the disability, student-need, and state requirements for classroom, state, and/or districtwide assessments.
Services and Placement	<ul style="list-style-type: none"> • The IEP provides evidence that the IEP goals and objectives drive the service delivery options. • The IEP provides a clear and explicit rationale for the selected LRE, including justification for the removal from the general education setting for any services.

Progress	<ul style="list-style-type: none">• Progress reports provide specific data, in measurable terms, about the student's progress toward each annual IEP goal, and supporting objectives, where appropriate.• Progress reports to parents/caregivers are written in plain language (i.e., jargon-free, objective not subjective, etc.) and provided to the parent/caregiver within the required timeline.
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Solutions that Matter