



SPECIAL EDUCATION AUDIT REPORT

Park Ridge-Niles School District 64

May 16, 2022

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General Information

Atlantic Research Partners (hereinafter “ARP”) responded to the Request for Proposals for Park Ridge-Niles School District 64 (hereinafter “District 64”) on November 1, 2021, to become the service firm to provide the district’s Special Education Audit. Originally, the onsite portion of the Special Education Audit was to begin on January 10, 2021; however, there was a slight delay in the commencement of the audit due to the COVID-19 pandemic and related district closure. The impact of the COVID-19 pandemic has been significant in District 64 and most districts throughout the country. Established practices and daily routines were disrupted, which particularly impacted special education and students with special needs. The onsite portion of the audit commenced on January 24, 2022 and continued through February 11, 2022.

Founded in 2007, ARP is comprised of a team of experienced education and management professionals focused on providing schools and school districts nationwide with analysis of organizational, pedagogical, and leadership practices affecting student academic achievement, while providing sustainable, research-established supports affecting employee performance in education. Reliable, results-driven methods are crucial to achieving and sustaining organizational effectiveness; practical, research-tested tools, strategies and protocols are pivotal; and ARP seamlessly provides those necessities to all schools and districts it serves. ARP has a footprint of serving schools and district in 26 states, with over 150 partnerships, impacting over one million students.

ARP services begin with a dedicated team of experienced professionals clinically analyzing district needs and current practices through a detailed and systematic evaluation, then ultimately building—with substantial client input and clear concurrence—specific management, education, organizational and leadership recommendations contained in the following written report, exclusively tailored to the specific needs and circumstances of the district. ARP recognizes that there is no one-size-fits-all approach to mastering the complex issues district, schools, administrators, building leaders, and teachers face each day. The evaluations and recommendations contained in this report are based on sound research and proven methods. Systems within the district and individual schools were evaluated and recommendations are suggested to improve district and school delivery of services to special needs students. ARP’s evaluation and recommendations contained in this report are intended for District 64 to provide high-quality educational opportunities to special needs students.

ARP is comprised of a diverse and skilled group of team members who bring the following (collective) qualifications to our organization and this work:

- Urban, rural and suburban school superintendent experience
- Director-level special education experience and district and state department of education levels
- United States Department of Education leadership experience
- Instructional and organizational performance auditing experience
- High school principalship experience
- Teaching at elementary, middle school, high school and college teaching experience
- Law firm, legal staff, state legislative policy, and student/family advocacy experience
- School transformation and academic turnaround experience
- School reconstitution and new school launch leadership experience
- Community organizing, community capacity-building facilitation and leadership experience
- Teaching quality research, training, and professional development experience
- Public school labor negotiations experience

Specifically for this Special Education Audit, ARP engaged its special education team to facilitate this audit, comprised of Dr. Bambi Lockman, Tom McDowell, and Todd Zoellick. All three have brought their individual and collective knowledge and expertise, as well as a depth of background in special education at various levels

in schools, school districts, and government entities. The following is a brief summary of each reviewer engaged in this audit, analysis, and report:

Dr. Bambi Lockman—Senior Advisor for Special Education. Lockman currently serves as a nationally recognized special education consultant and works with schools and districts throughout the United States. She has served as an Educational Policy Consultant for the Office of Early Learning, Florida Department of Education. From 2011-2014 she was the Deputy Superintendent for Instructional Services for Volusia County School District in Central Florida. Within her scope of work, she was responsible for the planning and coordination of PreK-12 curriculum and school improvement programs; federal and state grant funded programs, assessment and accountability, professional development, career technical education, online learning, alternative education, athletics and safety as well as exceptional student education and student support services, as well as Volusia’s Race to the Top grant. Prior to Volusia County, Lockman served as Chief of the Bureau of Exceptional Education and Student Services in the Florida Department of Education from 2004-2011. During this time, she was responsible for Florida’s implementation and general supervision of the Individuals with Disabilities Education Act (IDEA 2004), initiated postsecondary programs for students with significant cognitive disabilities, coordinated Florida’s State Performance Plan and Annual Performance Report, and managed the distribution of IDEA Part B and Part B Preschool grants. Lockman has been instrumental in Florida’s implementation of a Multi-Tiered System of Supports (MTSS) framework. Lockman also has extensive experience in Santa Rosa County School District, Milton, FL where she served as a classroom teacher and both a school based and district level administrator.

Tom McDowell—Senior Advisor for Special Education. McDowell has over 40 years of educational experience in both general and special education in public and private educational settings. He has served as a Teacher, Speech and Language Pathologist, Educational Diagnostician, Special Education Coordinator, Assistant Principal, Principal, Director, Executive Director and Educational Consultant to three major companies in the area of special education and students at risk. He has published two Programs: Language Development for Boys and Oral Language Communication for grades K-2 Standard American English and Reading. He implemented the first online IEP system along with the web based Medicaid billing system for the state of Florida. McDowell’s educational career has focused on fostering learning for all students. Utilizing strategies that reinforce students’ strengths, he centers on language and communication to achieve success. It is his belief that linking the best models, methods, technologies, and strategies, produce learning in each student. McDowell is an active member of state and national organizations that support education. He has served as president of: The Council for Exceptional Children, Association of State Directors of Student Services, Florida Language and Speech Association, Florida Association of Administrators, and Phi Beta Kappa Educational Association. He is presently a member of OSEP (Office of Special Education Programs) supporting achievement in the special needs students committee.

Todd Zoellick, Esq.—Chief Engagement Officer. Zoellick is an author, educator, and attorney. He has served in leadership roles in multiple education consulting firms and is the founder and president of an education advocacy organization for K-12 and higher education institutions that works to improve educational opportunities for students by providing support for administrators, teachers, and parents. He is also a university professor and lecturer on education, law, and public policy topics. Formerly, Zoellick served as the Deputy Regional Secretary at the United States Department of Education (2005-2009). Appointed by President George W. Bush, he served as one of Secretary of Education Margaret Spellings’ top officials in the Midwest, visiting thousands of schools throughout the region and actively engaged students, teachers, parents, administrators, business and civic organizations, and government officials to explain education policy and to build bridges between practitioners and policy makers. Zoellick specializes in special education evaluations and development of support systems for schools and districts throughout the United States.

Methodology and Process

For the district and all schools within the district, ARP provided a systematic, thorough, and comprehensive special education evaluation of programs, systems, and personnel; this site-specific process established baseline data upon which ARP's analysis, determinations, and ultimate recommendations are based. Determinations were rendered solely upon the basis of validated and documented evidence and in accordance with clearly articulated criteria. Further, ARP identified educational standards and compliance issues achieved and lacking at the school and district levels, which are contained in this audit report.

Crucial to ARP's approach is the collaborative involvement of school and district leaders and teachers at each building in which our teams work. Longitudinal studies by ARP and efficacy researchers nationwide establish that effective interventions and sustainable change occur only if those affected "own" and participate in implementation. Consequently, ARP maintains a rigorous focus on collaboration, professionalism, respectfulness, and sensitivity in all of its evaluative work. Issues are explored and probed *with* stakeholders—not independently or in isolation. High standards and high expectations are not compromised by collaboration; instead, opportunities for necessary change and sustained growth are data-proven to be enhanced.

The Special Education Audit was divided into three phases: Pre-Audit, Audit Site Work, and Post-Audit.

Phase One – Pre-Audit: During the Pre-Audit phase, the Audit Team gathered information from a multiplicity of sources, including the district office and all relevant departments within it, as well as publicly accessible data. Additionally, the team analyzed a comprehensive range of statistics and information regarding special education services in District 64. Much of the information gathered from the school district was through electronic records, district documentation, district policies, and discussions with district personnel. All school and district data were analyzed to identify trends and were compared to state averages, where appropriate and relevant.

The district was asked to provide documents and information about the special education and support services, including but not limited to:

- Organizational chart for the district
- Organizational chart for the special education team in the district
- Job descriptions for all special education personnel at the district level and the school level (i.e., district administrators, teachers, school psychologists, paraprofessionals, etc.)
- Copy of the special education handbook
- Copy of the special education budget (as much as you are able to share with an external vendor)
- If applicable, copy/description of your overall special education system/model/framework. Does this vary by building and/or classroom?
- Copies of any current special education grants awarded or applied for
- Copies of any special education audits conducted by ISBE or other oversight organizations
- Copies of any board policies related to special education in your district
- Description of any special education co-ops or associations that the district is in
- Description of all special education-related professional development sessions. Were they mandatory or optional? Who attended?
- Description of any training provided to special education parents/family members
- Number of special education students who receive specialized transportation services
- Description of your discipline plan for special education students
- Description of the process for providing a behavior intervention plan, if needed
- The name of your data management system for special education students
- The name of any assessment systems that are used for special education student

- Description of the district’s RtI program, including processes and procedures. What is the referral process? Is there an intervention form and who manages it? What type of progress monitoring is in place?
- Description of any summer programming for special education students in the district
- Number of students currently in special education by grade level, age, race, socio-economic status, and identification (i.e., OT, PT, behavior, etc.) district-wide and at each school
- Number of students with 504 plans district wide and at each school
- Number of overall students in the district
- Number of students in each grade level by school and classroom
- List of special education teachers by school building, including certification(s)
- List of special education paraprofessionals by school building
- List of special education support staff by school building (i.e., school psychologist, social worker, nurse, etc.)
- Daily schedule for each building as it relates to special education students (i.e., who is in what classroom at what time with what teacher)

Phase Two – Audit Site Work: The district and school site work provided the special education Audit Team the opportunity to begin to get to know the district. Key interviews were arranged and conducted with all special education personnel at the district level, as well as other district leaders. Special education teachers, special education teacher assistants (hereinafter “TAs”), and related service staff members at each building, were given an opportunity to meet with the Audit Team, as well as building leaders in each of the buildings. ARP team members visited special education classrooms in each of the building and observed nearly all special education teachers, TAs, and related services personnel at work teaching and supporting students. Additionally, ARP conducted virtual meetings with parent and community stakeholders. ARP joined several monthly, virtual Parents and Teachers Talking Together (hereinafter “PT3”) meetings in District 64, first to introduce the Special Education Audit, then to provide an update on the progress of the Audit, and finally to provide PT3 members an opportunity to offer their input on special education in District 64 to be included in the data collected for the Audit. ARP also hosted a virtual parent meeting on February 1, 2022, where all parents of special education students with IEPs or Section 504 Plans were invited to attend and provided with an opportunity for the Audit Team to explain the purpose and scope of the audit process and for parents and family members to share their perceptions of the strengths and challenges of special education in District 64.

From the site work, the Audit Team was able to formulate hypotheses about the district that were tested during the audit review, analysis, and final report write-up. The site work focused on classroom interaction with special education teachers, TAs, and students, as well as policies/procedures and district and school organization to support the work in the classrooms. Special education teachers and TAs who were observed were provided with feedback either immediately following the classroom observation or during voluntary “office hours” when they were able to stop by and talk with the Audit Team. The site work provided the opportunity for clarification on evidence gathered and discussion of any concerns that the schools personnel may have. It also provided the principal and/or special education team members an opportunity to present further data and clarify existing information through individual and/or group meetings.

Parents’ and teachers’ views of District 64 special education were explored through surveys developed in accordance with ARP protocols and offered while the Audit Team was onsite in the district.

Phase Three – Post-Audit: The special education Audit Team drafted this comprehensive report for the district that includes strengths and the areas for improvement identified during the onsite visits and throughout the audit process. Included in this report are findings, recommendations, and prioritization to address recommended next steps as identified in this report. The contents of this report can be integrated with the district strategic plan and/or district/school/student achievement plans and can be used as a basis for future

intervention in the district. This report is a snapshot of the state of special education in District 64 at the time that the audit was conducted and reflects the Audit Team's findings based on data reviewed, as well as interviews and observations of district leaders, building leaders, teachers, and other district personnel.

District Strengths

District 64 is a vibrant and diverse community that serves families in the Park Ridge and Niles communities in the Northwest suburbs of Chicago. While District 64 provides educational opportunities for students and families nearby the City of Chicago and Chicago's O'Hare International Airport, District 64 is neither defined by nor overshadowed by its close proximity to the largest city in Illinois or one of the largest airports in the United States. Instead, District 64 is an enclave for families seeking to provide every opportunity for their children. The district consists of socially and economically diverse families who are passionate about opportunities for their children, both special education students and general education students.

Historically, Park Ridge and the surrounding areas were well known for brickmaking, due to plentiful amounts of quality soil. That soil, combined with the ingenuity and determination of its early residents, allowed the community to provide bricks that built many of the buildings in Chicago and other cities in the area. Similar to the early brickmaking days in Park Ridge and the surrounding areas, District 64 is providing the fundamental building blocks for the education of all of its students. While the scope of this Special Education Audit, as the name implies, is limited to the special education services provided by District 64, the Audit Team was able to observe special education classrooms throughout the district, as well as general education classrooms for the purposes of observing co-teaching, push-in special education supports, and related services in the general education classrooms. In both special education and general education classrooms alike, there is a focus on students and high quality education to ensure that every student, regardless of need, receives the supports and educational opportunities that they deserve.

One of the greatest assets in District 64 is its strong administrative team and dedicated special education teachers, TAs, related services personnel, general education teachers, and staff members. While it is commonly assumed that these critical components to student education are present in every district in the United States, it is unfortunately not always the case. The human resources at all levels in District 64 are perhaps its greatest strength, easily eclipsing the great facilities, technology, and programs that the district offers. As a component of our onsite observations, the ARP Audit Team visited classrooms in each of the school buildings. Our focus was on observing special education teachers, TAs, and related services personnel. The special education teachers, TAs, related services personnel, and support staff clearly love children. Through our observations and conversations, we quickly learned that these professionals are child-focused in their decision-making and actions. This is an incredible asset for District 64. Daily these individuals do what they believe is in the best interests of the students that they support. While these actions may not always reflect best practices, as discussed within this report, they are consistently done with good intent and with the best interest of the student at heart.

In addition to caring for students, the special education teachers, TAs, and related services personnel are committed professionals. Some evidence of this came in the form of our onsite meetings and observations. Special education teachers, TAs, and related services personnel were given opportunities to meet with the ARP Audit Team either one-on-one or in group settings during "office hours" that were built into the observation schedule at each school visit. They were not required to meet with the Audit Team but could choose to do so during designated times that often included their lunchtimes and/or planning times in order to share their experiences in District 64. The Audit Team met with many special education personnel at each school building during these "office hours," and the meetings were constructive and informative for the ARP Audit Team. These were not staff that met with us simply to complain but rather to express many concerns and even provide constructive ideas for how their areas of concern could be addressed. Many of these staff members spent serious time preparing ahead of our meetings, coming to the table with notes and outlines of items they wanted to discuss. Staff members even stopped members of the Audit Team in the hallway in between classes to share their thoughts and provide insight they thought the team might find useful. This demonstrates a level of professionalism and concern for District 64 special education that was both refreshing and reassuring from the

special education professionals in the district who are committed to their work and their students. While certainly some staff members vented frustrations to the Audit Team, this is completely natural, expected, and healthy in this type of audit. At no time were any of the district personnel we met with anything less than completely professional and valuable resources for the ARP team. It is also important to note that during the Audit Team's meetings and interactions with special education professionals and staff members throughout the district, there were often positive comments about the administrators and resources available. Many were complimentary of both district leadership and building leadership and commended the work that has been done to improve the special education in District 64, particularly over the last several years with a new superintendent and Student Services administrators.

District 64 has assembled a strong and committed team of special education teachers and related services personnel. These special education professionals benefit from a plethora of curricula and materials acquired by the district over the years that can be used in the classroom and/or for targeted interventions with individual students. The curricula and materials provide a solid foundation of materials for educators to draw upon when assessing and addressing student needs in District 64. Likewise, there are often opportunities for special educators and other special education team members to augment their knowledge and skills with both internal and external training to support the use of curricula, materials, and/or integrating evolving trends in special education into the classroom.

In addition to investing in special educators, materials, and training, District 64 has assembled specialists for the Student Services department over a number of years. These specialists contribute immensely to the Student Services department and special education in District 64. The district is fortunate to have a Board Certified Behavior Analyst (hereinafter "BCBA"), who is very skilled and provides assistance for students with behavior needs, as well as training for educators and staff on behavior strategies and interventions. There is also an Assistive Technology Specialist in the district who conducts assistive technology assessments, develops assistive technology related instructional programs, and provides equipment recommendations for students with disabilities. Not all districts are so fortunate to have an Assistive Technology Specialist on staff, and District 64 benefits greatly from having a dedicated team member who can address the assistive technology needs of its students. Finally, District 64 also has an Intervention Coach and Student Services Coordinators who support teachers and staff members throughout the district as they provide special education services to the students. These individuals have become an integral part of the Student Services Department in District 64 and provide a wealth of knowledge and expertise in special education. These specialists will be discussed in greater detail later in this report.

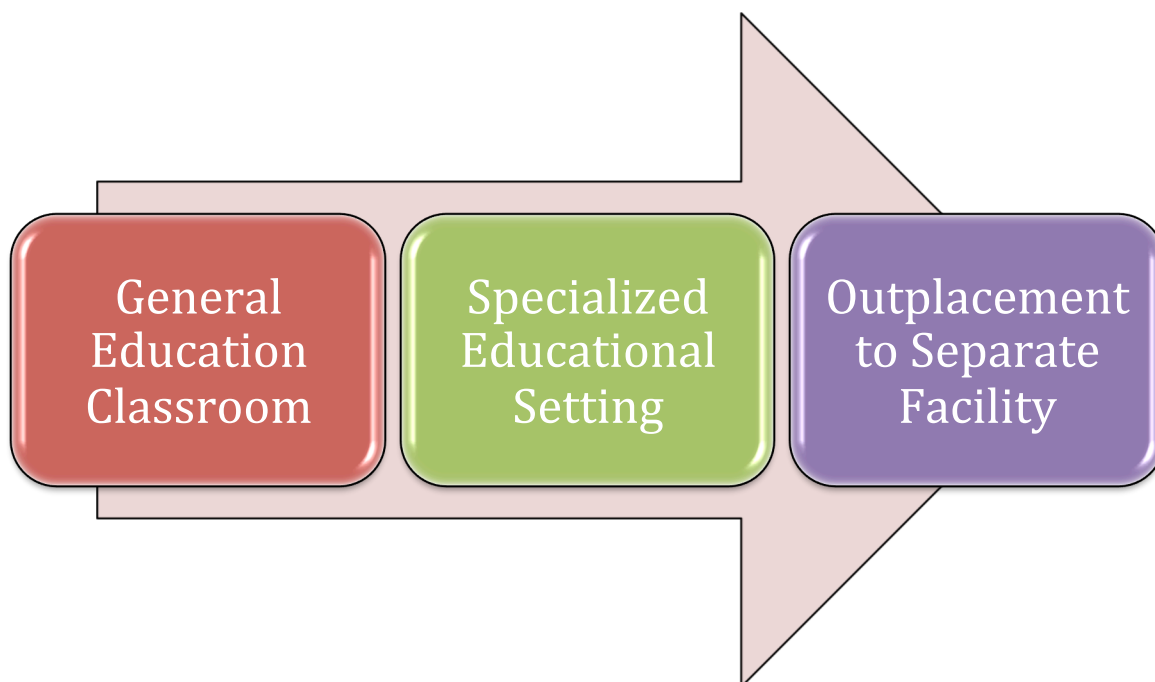
Supporting these exceptional educators, specialists, and staff members is a strong administrative team. The current Student Services Director has decades of experience as a teacher and administrator, both in traditional school districts and at three special education cooperatives. Similarly, the current Assistant Director of Student Services has extensive special education experience in districts across the region, as well. The Superintendent provides guidance to the Student Services Department but also demonstrates a high level of trust and support for both the department leadership and teachers, providing the necessary climate for growth and changes in special education in line with the district agenda and board policy. Other administrators, while on the periphery of special education, also provide support and operate as a collaborative team with the Student Services Department and special education. The Director of Human Resources is extremely competent and a strong leader who focuses on the appropriateness of staffing allocations, among other critical staffing supports, for special education in District 64. The Budget Director, while relatively new to the district, and his team provide the needed financial guidance and support for special education, as well. It is the Audit Team's observation that there is positive and beneficial interaction among the Students Services, Human Resources, and Budget departments that creates an environment where the necessary staffing and financial resources are combined with a strong vision for special education that results in providing the necessary resources to educate all special needs students.

In 2018, District 64 commissioned a special education audit by an outside auditing firm not affiliated with ARP. The 2018 audit reviewed many aspects of special education throughout the district and provided a snapshot of the special education system at that time and allowed for the district to develop a roadmap to address some issues identified in the audit. With a new Student Services leadership team, other new district leadership and building leadership, and new Student Services Coordinators in the intervening years, District 64 was able to address many of the challenges identified in that audit. While not all of the changes have been popular or easy, the leadership team, through the commitment and heavy-lifting of district and building administrators, school-based special educators, and support staff, have been able to implement changes that have brought about positive advances in special education in District 64. Even though some findings from the 2018 audit have been addressed or are currently being implemented, there are still areas where District 64 needs to make new or additional adjustments to strengthen special education in the district. The current Special Education Audit is completely independent of the 2018 audit and is intended to serve as a new and independent evaluation of District 64. All district and special education stakeholders should celebrate the strides made in special education over the past few years, while recognizing that there is continued work to be done. The remainder of this audit report provides the observations and recommendations of the ARP Audit Team to strengthen special education in District 64, providing a framework for implementing success for all students.

Observation #1: Develop a Robust Special Education Continuum of Services

It is important for stakeholders in District 64, educators, parents, and community members alike, to understand the nature and design of a special education system for students with special needs. Special education is a service for students with special needs, not a static service but a service that changes and adapts to meet the needs of special education students at various times over the course of the student's educational career. As a result, special education is considered a continuum of services.

A continuum of services for students with special needs utilizes different service delivery models to provide individually designed instructional strategies to a student with disabilities. Students are each individuals, and by that very definition as individuals, are unique and have specialized needs. It is both the role and the obligation of the school district to provide services to the student in a manner and setting that meets those individualized student needs. The continuum of services is a spectrum ranging from providing instruction in the general education classroom alongside peers with limited to no supplemental aids or services to outplacement in a separate facility.



The continuum of services in special education is critical to the educational development and support for students with special needs. Implicit within that term are two important factors that must be embraced by District 64 in order to meet the needs of all of its students. First, it is a continuum. The Merriam-Webster definition of “continuum” is “a coherent whole characterized as a collection, sequence, or progression of values or elements varying by minute degrees”¹. In the context of special education, that “coherent whole” is the educational system in place to educate all students within the district. However, within that coherent whole is a sequence or progression that varies by degrees depending on facts and circumstances. Each one of the students in District 64 finds himself or herself somewhere on that spectrum or continuum. It is the duty of the school district to help identify where each student is on the continuum and meet the individual needs of the student at that particular point and moment in time.

The second vital component of the continuum of services is that, as the name implies, these are *services* that are provided to students. In districts throughout the county, including in District 64, the notion of providing

¹ “continuum.” *Merriam-Webster.com*. 2022. <https://www.merriam-webster.com> (31 March 2022).

special education services can be blurred or confused. As educators, we often get so focused on attempting to meet the individual needs of students that we step away from the vital concept of special education as a service and instead focus on programs that can be used as interventions to assist students. While programs and interventions are critical to meeting the needs of students at various points on the educational spectrum (i.e., continuum of services), we run the risk of abandoning the concept of special education as a service and become focused on fitting students into programs rather than first locating where a student is on the educational spectrum and then identifying programs and interventions to support that student. Special education is not a program; it is a continuum of services to support students with special needs.

District 64 has historically not fully recognized the concept that special education is a continuum of services. In the 2018 audit, the concept of a continuum of services was addressed at that time. While district leadership and the special education team members have worked to fulfill the recommendations of the past audit and made significant strides in doing so, the concept of the special education system in District 64 being recognized as a continuum of services has not yet been fully realized. Based on classroom observations and conversations with special education personnel in the district, the Audit Team perceived that special education in District 64 is more program-driven rather than service-driven. Evidence of this is in the common approach of buying something (i.e., a program) to address an issue. The result is that there are many programs and interventions available to special education teachers in the district, which is wonderful to have that volume of resources. However, that runs the risk of further driving support away from services and toward a particular program by identifying one of the programs and assigning a student to it. Instead, teachers and administrators should evaluate students to determine where they are on the continuum and support those students with targeted interventions. District 64 should not let the programs and interventions available dictate the needs of the student; rather, the needs of the student must determine which interventions are most appropriate and how they are utilized.

Currently, the district has a clearinghouse of information to inform teachers of the programs and interventions available to support students. However, simply having a clearinghouse or a list alone is not sufficient to provide teachers with the necessary information that they need to make informed decisions for their students regarding appropriate programs or interventions. There must be a genuine understanding of the utility of a particular intervention and how it is most effectively used to meet the identified needs of the student on the continuum. District 64 provides some training for teachers on various programs and interventions that teachers have available to them. Based on the Audit Team's conversations with teachers in District 64, not all teachers have a strong understanding of the programs and/or interventions available to them or how to appropriately implement those programs and/or interventions despite the training offered. It is the recommendation of the Audit Team that District 64 should continue to provide teachers with the resources and training to understand how to appropriately use programs and interventions to support students with special needs, evaluate teacher's understanding following the training, and provide additional training as needed for optimal implementation to meet student needs.

This practice of connecting students with a particular program for special education supports rather than approaching special education as a continuum of services is evident throughout the district. When asked by the Audit Team for a model of instruction for a particular special needs student, many special education teachers often referred a particular program rather than an instructional model. Programs are good, but they need to be utilized in targeted ways as interventions that tie directly to the needed supports or goals in a student's IEP. They are not special education models of instruction.

There are effectively four models of instruction on the special education continuum of services. They are as follows:

- 1) **Monitoring Services.** Monitoring services include a special education teacher providing support (typically 15-30 minutes per week) directly to a student with a disability who receives all instruction in a

general education classroom (i.e., full inclusion). Services are regularly scheduled, and students are monitored accordingly in conjunction with the goals in the IEP.

- 2) **Facilitated Instruction (Support).** Facilitated Instruction involves the special education teacher providing instructional support and strategies to students with disabilities during the general education class period, but not every day or not for an entire class period, as is the case with co-teaching.
- 3) **Resource.** Resource includes the special education teacher providing support services to the student in a separate location on a regular set schedule to meet the student's instructional needs (i.e., pull-out services).
- 4) **Functional Instructional Strategies/Skills Class.** In a Functional Instructional Strategies/Skill Class, the special education teacher has the students all day except for any specials, lunch, or other non-instructional times. Essentially, special education students are housed in a separate classroom away from their general education peers.

These models of instruction demonstrate the special education continuum of services from most inclusive to least inclusive for special education students in general education classrooms.

Within these models of instruction, there are three instructional methods. The first is Remediation, which is essentially taking a student backwards in the curriculum to support concepts and skills that were taught previously but not mastered. Remediation is the supporting of basic skills deficits, reflecting the IEP goals that are typically developed for deficient skills. This model could be used with Monitoring Services or Functional Instructional Strategies/Skills Class. The second instructional method is Differentiation. Differentiation is supporting students with concepts and skills that are currently being taught in the general education classroom. It allows all students to access the core curriculum by providing entry points, learning tasks, and outcomes that are tailored and designed to students' needs. Teachers can differentiate content, process, and/or product. This model could be used with Facilitated Instruction or Resource. The third instructional method is Acceleration. Acceleration is the exposure to future skills and concepts that the student will need to master in order to make instructional learning gains. This model could be used with Monitoring Services, Facilitated Instruction, or Resource.

The concept of a true continuum of services for special education is not fully realized in District 64. Many improvements have been made in the past four years; however, the notion of a continuum of services is not completely understood or embraced by special educators within the district. Special education is not typically viewed as a service, but rather it is program-driven, with the list of programs available dictating the interventions provided to a student instead of student needs and goals contained in the Individualized Education Program (hereinafter "IEP").

Recommendations

- 1) Develop a student instructional model that provides a clear framework for establishing special education as a continuum of services. This framework should be jointly developed by district administration, building leaders, special education teachers, and related services personnel. The framework should be developed as a collaborative effort of all essential parties, with outside supports as needed, and rolled out to the both special education personnel and general education teachers as a collaboratively created framework.
- 2) Establish and utilize a data system to determine when students transition from one model of instruction to another based on student data and not heartfelt data.
- 3) Provide both special education personnel and general education teachers additional training on models of instruction and instructional methods for special education students. The supports provided to students need to be effectively linked to the goals of the IEP, and both special education teachers and

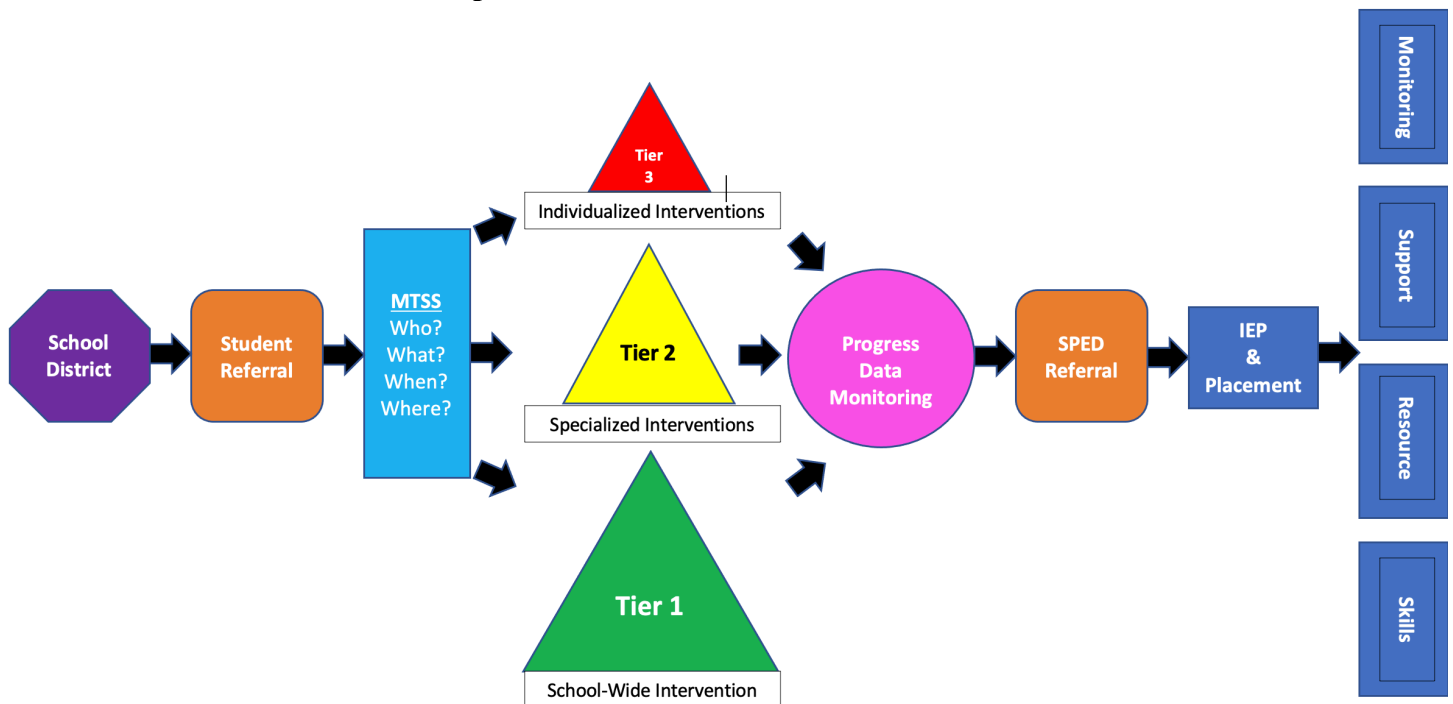
general education teachers need to be able to recognize the instructional methods needed for students to succeed.

Observation #2: Create a Framework for Consistently Meeting Student Needs

The goal of every school district is to meet the needs of all students in the district. There are many great things happening in every building throughout District 64. Educational opportunities exist for students and committed staff members work hard to try to provide students with the supports and interventions that they need. As stated in Observation #1, a critical component of meeting the needs of all students is to adopt a continuum of services model for special education students. In that case, all students will have their needs identified and will have the necessary supports and interventions to meet their specific needs.

District 64 should develop a comprehensive special education structure in the district. This structure needs to be broad in scope to address needs from the Early Childhood program all the way through eighth grade. There should not be any ambiguity in special education or change from one building to another. If parents move from one elementary school boundary to another, they should find the same special education structure in place at the new school as was embedded at the previous school. Likewise, the structure should be comprehensive, addressing the needs of students from the identification of students who need additional assistance all the way to placement in special education and a determination of the models of instruction and instructional methods utilized. The following is a graphic that is discussed in greater detail throughout this report. It demonstrates the complete structure needed for a comprehensive student instructional model that is utilized at every grade level and in every building throughout the district.

Proposed Instructional Model for District 64



Many of these components in the Proposed Instructional Model for District 64 graphic above already exist in some form in District 64; however, they are not included in a comprehensive structure adopted by the district and utilized in every school within the district. As previously discussed, models of instruction and instructional methods at the far right following placement in special education must be clarified and adopted by special education teachers and other special education personnel throughout the district. Similarly, the MTSS structure in the middle of the graphic is not utilized to its full potential and is discussed later in this report. Structure is important in education. It is important for students to have structure for their development. It is important for educators to have structure so they understand systems, processes, and procedures and what is expected of

them. It is also important for the district to have structure for continuity throughout its buildings to operate as a cohesive unit and avoid building-level silos.

In addition to the broad special education structure that should be developed in District 64, there must be continuity among schools and special education teachers for individual student interventions. While District 64 has worked to develop a clearinghouse of approved student interventions and provided training on some of those interventions as discussed in Observation #1, there is not a fully developed, district-wide system in place to determine the utility of interventions. Special education teachers reported to the Audit Team that despite some training, teachers do not always feel that they have the necessary direction for which interventions are appropriate for students and when those interventions should be used. Even though District 64 has developed curriculum maps and employs an intervention coach to support teachers in the selection of appropriate interventions in the classroom, many special education teachers indicated lack of direction to determine what interventions are available for use with their students. In some cases, teachers reported finding their own interventions by relying on Google or other methods of search that may not provide interventions that reflect best practices.

Special education teachers and general education teachers need additional information about each of the interventions to determine when to use them, which student needs they might be appropriate for, and where along the instructional model they should be implemented. Teachers should be appropriately trained on all relevant interventions prior to authorized use with students. District 64 conducts training for special education teachers during the school year, both during and after school, as well as during the summer, with training provided by both internal coaches and external providers. However, despite the training that is offered, some teachers did not have a thorough understanding of the interventions available to them and/or how to appropriately implement interventions. The training that District 64 provides should continue and be augmented to ensure that all teachers have a thorough understanding of the available interventions.

The process for determining which models of instruction, instructional methods, and interventions to use to support a particular student must have a basis for determining individual student need. The foundational document for making those determinations is the IEP. Under the federal special education law, the Individuals with Disabilities Education Act (hereinafter “IDEA”), when a request to consider placement of a student in special education comes either from a parent, a teacher, or other personnel within the school, there is an evaluation process that must occur. Data is collected on that student, which can include but is not limited to academic data, behavior data, observational data from teachers and other personnel, and reports from non-school-based providers, among other data points. A meeting is held with all relevant parties—classroom teachers, special education teachers, related services personnel, and administrators—to examine all of the data and determine if there is an educationally sound reason for determining eligibility and placing a student into special education and ultimately providing them with an IEP. All stakeholders should understand that special education eligibility requires the following components: 1) students must have a qualifying disability; 2) the disability must adversely impact the students access to and progress in general education; and 3) the student must require specialized instruction in order to make progress.

The critical point is that all data is reviewed and analyzed by the educational experts, along with parents and representatives, to make the determination that a student should be placed in special education. One of the reasons that IDEA was initially created was to limit or avoid simply putting a challenging student in special education to get them out the general education classroom. The law provides a process for making that determination in educationally appropriate ways. It was intended to create a partnership among the school, district, and parents to determine if students need special education services by examining a plethora of data.

Throughout this Special Education Audit, the Audit Team examined random samples of student IEPs and discussed student IEPs more generally with special education teachers and administrators. There is some

evidence that there are a small percentage of students with current IEPs who may not need all of the services currently provided within the IEP. There are many reasons why a student may have a particular intervention or service provided in the IEP, including but not limited to a recommendation made by a teacher or related service provider, a diagnosis from a physician or third-party provider, or a request from a parent with appropriate documentation to support the request, among others. Students with behavior needs contained in an IEP may also be included in special education. Whatever the reason for the student to be given an IEP and placed in special education, it must be well documented and based on student data.

Once it is determined that that a student is eligible to receive special education services through the evaluation process briefly described above, an IEP meeting is held with all relevant parties. These IEP meetings include parents, administrators, general education teachers, special education teachers, related services personnel, and any others who were involved in the evaluation of a student for placement into special education. The purpose of the IEP meeting is to meet as an educational team to establish goals for the student to become academically successful, determine the supports that student needs to meet those goals, and begin to develop a document that identifies those supports and interventions. All of the individuals attending the IEP meeting are critical voices in determining the path forward for the student, and all are required under IDEA.

As students progress through the continuum of services and the appropriate interventions as dictated in the IEP, some students will continue to need supports as they move from grade to grade within the district. However, it is important to recognize that some students will respond well to interventions, and over time, data may demonstrate that those students no longer have the same needs as when the IEP was drafted and approved. In those cases, students must be re-evaluated to determine if the interventions and supports are still needed. For students who have been successful with interventions provided in special education and required in the IEP, they may progress out of special education and back into a general education setting. It is important for parents and special education personnel alike to remember that determination of need for an IEP is not a lifetime appointment to special education. While some students with significant or severe disabilities may spend all of their educational careers in special education, many students through successful interventions and close data monitoring meet dismissal criteria and are successful in general education.

There seems to be a notion among some parents that if they are able to get their student into special education, the student will receive more support to reinforce the educational concepts taught in the general education classrooms. While on the surface this might seem logical, it is not an educationally sound practice for determining a student eligible for special education, and it is unlikely ample data will be available to support that decision. Educationally speaking, we want students to receive all of the supports that they need to be successful in school. In some cases, that means placement in special education after a thorough evaluation. However, the goal is to provide students with those supports in a traditional classroom and educational setting, if at all possible. Special education should be the last option and not the first effort to support students academically.

Recommendations

- 1) Develop a comprehensive, district-wide instructional model for District 64, similar to the Proposed Instructional Model for District 64 graphic. Implement that model in every school and ensure it becomes the standard that is used throughout District 64 when determining eligibility and/or making IEP/programmatic decisions or changes.
- 2) Augment training to special education teachers, general education teachers, and related services personnel for all interventions that are included in the clearinghouse of available interventions, including why to consider them, when to integrate them into the array of supports for a student, and how to effectively utilize them.

- 3) Review student IEP eligibility to confirm that student needs have not changed and all IDEA guidelines are consistently followed; ensure the collection and analysis of current student data in order to make appropriate educational decisions.
- 4) Provide training as needed for special education teachers, general education teachers, related services personnel, and/or administrators on IDEA, including the processes and procedures for determining eligibility/placement into special education to ensure compliance with federal law and district educational obligations to the student.

Observation #3: Adopt Inclusion Classrooms and Co-Teaching as District Standards

IDEA mandates that students are educated in the Least Restrictive Environment (“LRE”), which means that students with special needs are educated to the maximum extent possible in the same classroom as peers without disabilities. The specific language in IDEA states,

“to the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities, are educated with children who are not disabled, and that special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occurs only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily”.²

The LRE is not a specific place. Rather, it is a setting that is most appropriate for the student and most closely aligned to the general education classroom. The IEP team determines the LRE that is most appropriate for a student with special needs. There is a continuum of placements for the LRE that includes the following:



A full inclusion model means educating students with disabilities in the general education classrooms with the philosophy that all students, including students with special needs, should be given the same opportunities, which can only be achieved if all students are in the same classroom receiving the same instruction. There is a strong desire for inclusion of all students in general education classrooms. However, the desire for inclusion does not always match the execution of inclusive classrooms. An inclusion classroom is a general education classroom where students with and without special needs learn in class together alongside one another in the same classroom. If District 64 is going to adopt a district-wide philosophy of inclusion, students should be included in all classes, not just some classes. Currently in District 64, there are examples of inclusion classrooms in every building, yet a true inclusion philosophy does not exist. Many special needs students are pulled out of certain classes, such as specials (art, music, physical education), and instead that time is designated for their related services, such as physical therapy (“PT”), occupational therapy (“OT”), speech and language (“SLP”), or meeting with the school psychologist or social worker. While this certainly creates ease around scheduling related services for special needs students, it is not promoting a true philosophy of inclusion in the district. Additionally, some special education students at the middle school level are precluded from participation in one or more of the many electives offered to their general education peers (e.g., Marine Biology). A true inclusion model does not exclude students from their specials or elective classes but instead will pull students for related services at various times and from various classes so they can participate in all types of classes with their peers.

District 64 has started to embrace co-teaching in some of its classrooms, currently limited to grades 4-8. Co-teaching is the classroom concept where general education teachers and special education teachers together act as classroom teachers, working alongside one another to provide instruction for all students, both general education students and students with special needs. They are, as the name implies, co-teaching or teaching in the classroom together. Co-teaching can benefit many students in both general education and in special education, but as with any strategy, the district must ensure that the needs of the students are being met. There

² IDEA, 20 U.S.C. § 1412

are wonderful examples of co-teaching occurring throughout District 64. However, co-teaching is not occurring in every classroom. The Audit Team encourages district leadership to explore, together with general education teachers and special education teachers, the possibility of expanding co-teaching into all grade levels. In order for co-teaching to be an effective and realistic option in District 64, two things must occur: 1) general education teachers and special education teachers must be provided with co-teaching training together to ensure a true co-teaching model, and 2) general education teachers and special education teachers must be provided with common planning time to plan their lessons together.

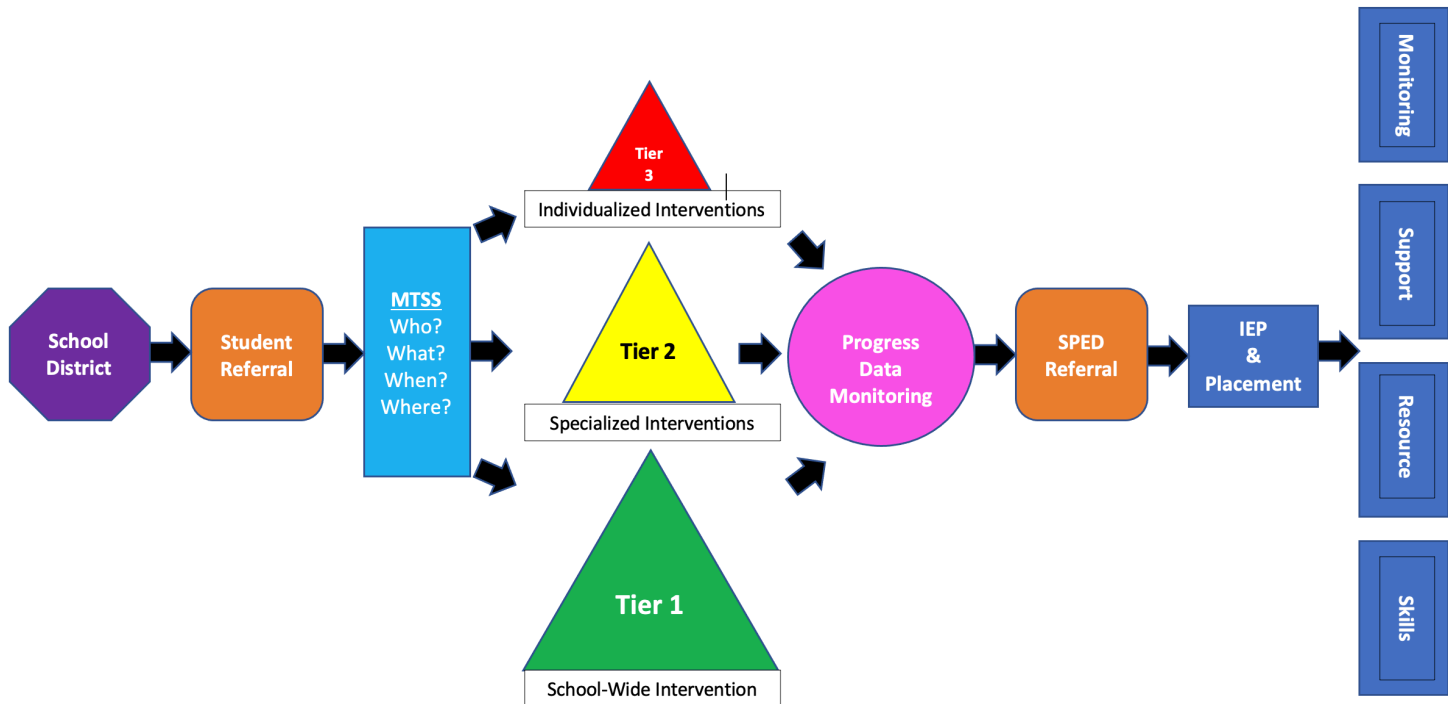
Recommendations

- 1) Provide joint professional development for general education teachers and special education teachers on differentiated instruction, creating inclusion classrooms, and implementing co-teaching in the classroom so that these concepts become more mainstreamed and consistent throughout the district.
- 2) Establish common planning time for general education teachers and special education teachers who will be co-teaching together so that they can jointly prepare their lessons for the greatest student impact.
- 3) Develop a monitoring system to monitor if the co-teaching implemented in the classrooms is appropriate and effective for advancing student achievement.

Observation #4: Develop a True Multi-Tiered System of Support (“MTSS”)

Multi-Tiered System of Support (“MTSS”) is a district-wide continuous improvement framework that provides data-based decision-making for student supports at all grades and levels of student achievement. MTSS is a framework designed as a roadmap for districts to provide instruction, evidence-based assessments, and targeted interventions to assist student who need additional supports. It is important to note that MTSS is not the same as special education. It is a framework for student support that precedes special education and through which all students in need of support should be considered and identified for targeted, tiered interventions. It should be noted that the MTSS process and data can be utilized to support the students’ eligibility determination for special education services. To provide a visual representation for MTSS, the following is again the Proposed Instructional Model for District 64.

Proposed Instructional Model for District 64



The initial step to determine the needs for additional supports and ultimately whether a student should be considered for special education services begins with a Student Referral. Student Referrals for assessment to determine eligibility for special education and related services may come from teachers, parents, agencies, appropriate professional persons, and from other members of the public. There are specific Student Referral Procedures that the Audit Team suggests. All referrals for special education and related services must receive a response from the district, consistent with federal law. The process is as follows:

- 1) Referrals for assessments to determine eligibility for special education and related services should be made to the school building principal or designee at the student’s school of residence.
- 2) Referrals may be processed through a student intervention team to review the referral and document interventions tried prior to referral.
- 3) All requests for assessments should be submitted in writing. If a parent or any individual makes the request verbally, the principal or designee should request that the parent or individual make the request in writing. District 64 and its legal counsel do not dismiss verbal requests from parents or others.
- 4) If the referral is not coming from the parent, the school building administrator or designee will

review the referral. If the information is incomplete, the referral source will be contacted to request additional information. If the information is complete and appropriate, the school building administrator or designee will initiate the assessment process, including notification of parents. If determined that an assessment is required, an assessment plan will be developed, within 14 school days of receipt of the referral.

- 5) All school staff referrals should be written and include a brief reason for the referral and documentation of the resources of the general education program that have been considered, modified, and when appropriate, the results of intervention.

MTSS is school-based and uses data-driven problem solving and incorporates instruction and interventions to address both the academic and non-academic needs of all students. There are three tiers in MTSS. Tier 1 instruction is provided to all students to receive high quality, differentiated, culturally responsive core academic and behavioral instruction through the general education program and is designed to meet the needs of and ensure positive outcomes for a minimum of 80% of all students. General education students, as well as students who advance through the MTSS tiers and ultimately are placed in special education receive this instruction. Tier 2 interventions are the supplemental programs and strategies provided to students who require supports in addition to the universal or school-wide supports of Tier 1. The purpose of Tier 2 interventions is to reduce the risk of academic or behavioral issues. Finally, Tier 3 is the highest level of support that is provided to a student without an IEP prior to placement in special education to provide more intensity, duration, or frequency of an intervention.

The framework for MTSS utilizes evidenced based instruction, intervention, and assessment practices. Interventions are strategies or techniques used to teach a new skill, build fluency in a skill, or encourage the application of existing skills to a new situation. The interventions must be student-specific and include targeted assessments, planning, data collection, and progress monitoring. All student-specific interventions must be evidence-based (i.e., have been shown to work with students over time in the school environment), monitored regularly to determine student achievement and inform instructional decision-making, and implemented during the instructional school day. There are myriad interventions available to schools and districts. Some are formal programs or products, while others are techniques that can be used in the classroom setting. All interventions must be student-specific, so a successful support for one student with a particular special need may not demonstrate results for a student with a similar special need. The following are a few examples of appropriate interventions to demonstrate that both formal, commercial product interventions and teacher-developed, non-commercial interventions are available for use with students:

- Achieve 3000
- Check In/Check Out
- Use of technology (i.e., computers, iPads, switches)
- Online intervention commercial programs
- Quiet place in the classroom
- Mini lessons of skill deficits
- Targeted instruction
- Teacher-generated materials for instruction
- Social worker intervention
- Problem solving interventions
- Behavior plans

Critically, the intervention chosen for the student must be evidence-based and student specific. As specific interventions are utilized with a student, teachers must assess whether the interventions are successful or not. If they are successful and produce positive outcomes for students, the intervention can continue to be used until the student is ready to move on to a different intervention. If an intervention is not a success with a student, the teacher must then analyze and choose an alternative intervention that may be a better fit for the student.

This analysis and determination of the success of interventions is determined by student academic data through a process called progress monitoring. Progress monitoring is a diagnostic intervention used to determine if student interventions are successful, not successful, or need to be clarified (neutral). It is a data-driven, visual representation of a student’s progress on the interventions for that particular student. As a best practice, progress monitoring should be completed over a six-week period, a minimum of three times throughout the school year. Not all students will begin their interventions in Tier 1. Students will be placed, and subsequently progress monitored, in whatever tier is determined to be most fitting based on their individual needs. Districts should have a consistent progress monitoring methodology.

The following Progress Monitoring Example shows a visual representation of a student monitored on 10 items that would be customized for their individual situation. In this example, the trend line from week one to week six shows an upward trajectory as a student progresses through the six-week monitoring regimen. Note that in Week 3 of the Progress Monitoring Example the student has a setback, which is not uncommon, but the general trajectory is still upward, demonstrating a positive progression. If the trend lines are “going up” or moving in a positive direction, students are making progress under the interventions that were selected for them in their assigned tier. If, however, the trend line is either “going down” (moving in a negative direction) or staying neutral, then the interventions selected are not working for that student. In that case, a determination must be made if a student should be moved to the next tier for more intensive interventions. If a student is in Tier 3 and still not demonstrating progress with the Tier 3 interventions, then the student may be referred to special education and would follow the special education referral process, including eligibility determination. If the student is determined to be eligible, an IEP would be developed and placement would be made within the continuum of special education services.

Progress Monitoring Example

	<u>Item 1</u>	<u>Item 2</u>	<u>Item 3</u>	<u>Item 4</u>	<u>Item 5</u>	<u>Item 6</u>	<u>Item 7</u>	<u>Item 8</u>	<u>Item 9</u>	<u>Item 10</u>
<u>Week 6</u>									X	
<u>Week 5</u>									X	
<u>Week 4</u>							X			
<u>Week 3</u>			X							
<u>Week 2</u>						X				
<u>Week 1</u>				X						

District 64 has sought to develop a meaningful MTSS system. While most components of an MTSS system exist in District 64, they are not always operating systematically or appropriately utilized by educators or staff members. The MTSS system that is currently in place in the district is housed in and implemented through the Department for Student Learning. There is an MTSS website designed by the district that provides broad concepts of MTSS that district personnel can reference for support. Many district personnel that the Audit Team interviewed were familiar with and even referenced the MTSS website. While this website contains some useful information and explanations of MTSS generally, it is not as specific to District 64 as the Audit Team would like to see. If district personnel are utilizing the MTSS website as a primary resource for information

about MTSS in District 64, then we recommend that the website should be more robust and include an MTSS framework that reflects district needs and strategies for the district MTSS system.

Through classroom observations in schools and classrooms and interviews with district personnel, the Audit Team discovered that there is not an adequate MTSS framework in place in District 64, and many personnel in the district do have a true understanding of MTSS or how it is utilized to support students. In a true MTSS system, it is expected that a vast majority of students are receiving Tier 1 supports. They are in the general education classrooms, receiving instruction from the classroom teacher with individually tailored augmentations as needed and in a limited capacity. Generally, Tier 1 supports are successfully occurring in District 64.

Tier 2 interventions are more targeted and specialized. These are interventions that target students who need additional help, based on teacher observations and data collection through progress monitoring. In Tier 2, teachers may utilize some of the interventions discussed throughout this report to attempt to provide some additional instruction and/or support for struggling students. In District 64, the Audit Team observed that there is some evidence of Tier 2 interventions occurring in some classrooms within the district. However, the Tier 2 interventions are mostly sporadic, and there does not appear to be a cohesive definition among teachers and other personnel for what Tier 2 MTSS interventions are in District 64. District leadership has provided professional development and training for teachers on MTSS, but not all teachers have a full understanding of Tier 2 or how to implement Tier 2 interventions to support students. It is important for teachers to continue receiving MTSS professional development and training and work alongside district administrators to develop a full understanding of Tier 2 in District 64. Additionally, District 64 has Intervention Teachers who provide support and guidance for classroom teachers specifically around interventions. The district has sought approval for additional Intervention Teachers in recent years, which would have a positive impact on ensuring that Tier 2 interventions are properly utilized and supported.

The Audit Team observed little evidence that there are consistent and meaningful Tier 3 interventions occurring in District 64. Tier 3 interventions should be more intense interventions providing more targeted supports for students who continue to struggle. Tier 3 is the last opportunity for interventions to support students before they are potentially referred to special education. However, through discussions of Tier 3 interventions with teachers in District 64, it is evident that Tier 3 is not comprised of more intense interventions. Most teachers could not define Tier 3 interventions or explain the difference between Tier 2 interventions or Tier 3 interventions in District 64. Many teachers indicated that it is their belief that Tier 3 is synonymous with a referral to special education, which is not accurate and should not be the case in any district. As a result, in many classrooms throughout the district there are either no Tier 3 interventions or inadequate Tier 3 interventions for students. Without necessary Tier 3 interventions, there is not a typical progression of interventions from Tier 1 to Tier 2 to Tier 3. Instead, in many cases in District 64, Tier 1 interventions are followed by some Tier 2 interventions and then a referral into special education rather than more targeted Tier 3 interventions. This is not a complete MTSS system, and it does not provide students with a full range of interventions prior to referral into special education.

In order to have a true and robust MTSS framework, general education and special education departments must work in tandem to ensure that appropriate interventions are being offered in each of the Tiers. Additionally, the difference between MTSS interventions and special education supports should be clearly delineated. This does not currently appear to be the case in District 64. The perception of both the Audit Team and many district educators interviewed by the Audit Team is that the Student Services and Student Learning Departments are currently running on parallel tracks. There appears to be minimal meaningful interaction between the departments as it relates to the progression of students through the MTSS framework and possibly into special education. Through conversations with teachers, it was uncovered that there seems to be a notion that if students are receiving Tier 2 interventions there is a high likelihood that the student will be ultimately referred

to special education, especially in light of the fact that there are not always meaningful Tier 3 interventions in place.

The Student Services and Student Learning Departments should work together to collaboratively develop an instructional model that progresses general education students through all three Tiers of MTSS, while progress monitoring them, and ultimately developing a framework to refer students into special education only when the targeted interventions have been unsuccessful. District 64 currently has a number of resources for progress monitoring students, including but not limited to STAR, FastBridge, and grade level common assessments, among others. The progress monitoring resources should be relied upon to collect student data and determine the success of the tiered interventions employed and the need to move students from Tier 1 to Tier 2, from Tier 2 to Tier 3, and ultimately from Tier 3 into special education. It is important to develop a coherent and district-wide MTSS framework that all district personnel understand and implement with fidelity. It is our recommendation that District 64 partner with an outside provider to assist the Student Services Department and the Student Learning Department in the efficient and expedited development of a robust MTSS framework. Once the MTSS framework is established, both general education teachers and special education teachers must receive updated professional development and training on the proper use of interventions, data collection, and progress monitoring, as well as the transition process through the Tiers and possibly into special education.

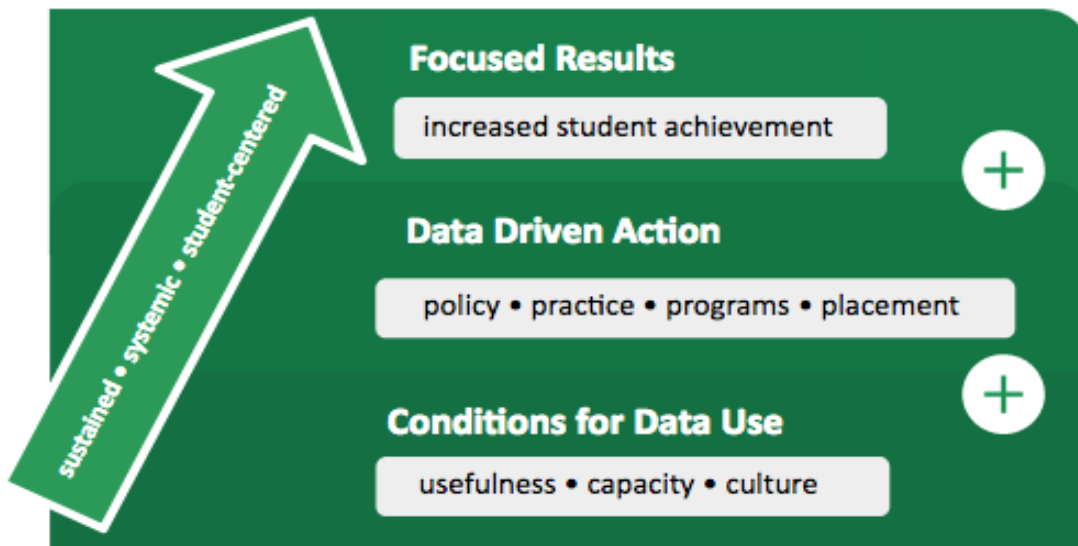
Recommendations

- 1) In collaboration with district leadership, general education teachers, special education teachers, and potentially an outside provider, develop a true MTSS framework that can be implemented district-wide, with every building following the principles contained within the MTSS.
- 2) Establish a clear path for how a student moves from Tier 3 in MTSS to special education and institute standards so there is an authentic difference between Tier 3 interventions and special education instruction.
- 3) Provide general education teachers and special education teachers with continued professional development and training on how to appropriately progress monitor students, how to collect individual student data to determine the success of interventions, and how to create a portfolio of student intervention data that could help to inform the need for placement into special education.

Observation #5: Develop a District-Wide Data Strategy

Data collection and usage is a vital component in special education and for the overall district instructional model. It is critical that data drives every decision that is made in the district, both for general education and for special education. Data should be utilized and driving each stage in the Proposed Instructional Model for District 64. For example, referring a student to receive additional supports in the MTSS system must include data to identify student need, to determine the nature of need, to indicate the type of intervention that should be utilized, and to evaluate if the intervention is impacting student growth and learning. Likewise, if a student has been receiving Tier 2 or Tier 3 supports, data must be the determining factor to indicate if a student is making progress or if a student needs to advance to the next Tier of support or ultimately be referred for special education services. Data must always drive decision-making.

District 64 certainly utilizes data. There is ample evidence of data usage throughout the district. District leadership utilizes data in its decision-making, and teachers throughout the district utilize observational and assessment data regularly to monitor student progress and assess student achievement. Specifically in special education, data is used to determine student placement and supports contained in the IEP. In District 64 data is utilized regularly in many classrooms, but full data usage and understanding is still emerging within many classrooms in the district. There is not a well implemented, district-wide standard for data utilization in special education. The Audit Team has reviewed data slide decks developed by the Student Services Department that have been shared with teachers and staff members during data training sessions. However, there does not appear to be universal adoption of the data directives in all classrooms within the district. Additionally, conversations with many teachers during the audit process revealed that there is not a strong understanding of the data policies that are in place within the district. Of course, there is understanding that data must be collected and maintained for a student file, but there is not a universal standard being utilized district-wide of what data is collected, how that data is utilized, and where data is stored for future use. Data collection, use, and storage for special education varies from building to building and from classroom to classroom. There should a standard data collection, utilization, and storage policy for special education followed by every special education teacher, TA, related services team member, staff member, and administrator in every building in District 64. The policy should be a standard that is used for every student that is being evaluated for special education services, as well as every student who is receiving special education services.



Data-driven decision-making should be at the core of District 64's approach to the development and/or implementation of a special education data policy. Three conditions are necessary to support data informed actions: 1) usefulness of data, 2) capacity to use data effectively, and 3) a culture that values the regular collection and use of data. Data should drive the formulation of policy, dictate the evaluation and design of programs, guide practice by informing the use of appropriate instructional and intervention strategies, and determine the placement of students. These data-driven actions are essential for a strong special education system that is sustainable, systemic, and student centered. Of course, the ultimate result is increased student achievement and a meaningful and deliberate use of data to determine the actions and interventions tailored to meet individual student needs.

District 64 needs to ensure that all personnel are sufficiently trained in the collection, usage, and storage of data. While data training occurs within the district, not all educators in the district are following the training, and as a result, there is not currently a consistent data system that is used by all personnel in every building in the district. A data system should be developed that is consistent from central office to each of the buildings in the district and all educators should understand and implement the system. Training should inform educators on the proper methods of data collection, but more importantly, what to do with the data once it is collected. Data must be used to inform classroom instruction, drive interventions, and ultimately determine student placement and supports.

Recommendations

- 1) Develop and implement a district-wide data policy that creates a standard for special education data collection, usage, and storage that is focused on student achievement and placement, interventions, and supports.
- 2) Provide special education teachers, TAs, and related services personnel with additional professional development and training on how to accurately collect data, how to utilize data, and how to preserve data as a vital component of a student's file for evidence and future decision-making.

Observation #6: Rethink Staffing Needs of Special Education Teachers, Student Services Coordinators, School Psychologists, and TAs

The special education team in schools is made up of skilled, committed personnel who work with students with special needs in each building. While the number of special education personnel varies from building to building, the core structure is similar, with each building having special education teachers, TAs, and related services personnel, including school psychologists, social workers, OTs, PTs, and SLPs.

Special education teachers in District 64 are generally highly competent and very skilled in their supports for students. Most are committed to their work with the students on their caseload and beyond, and there seems to be a collaborative environment for special education teachers in each of the school buildings. These special education teachers are critical to meet the needs of special education students and provide the necessary educational requirements contained in students' IEPs. However, there is also a significant amount of turnover among special education teachers. It is difficult to provide continuity of services to students, as well as consistency of programming and structure of the Student Services Department, when there is a high level of turnover. Teachers are experiencing frustration, not over their students, but over their work environment and the stresses that come with providing services to a student population with high needs.

Based on the Audit Team's interviews of personnel, this frustration stems from several issues at play within District 64. Among special education teachers in the district, there is some discussion about caseload. Examining the average caseload for special education teachers in District 64 reveals that the caseload is at an acceptable level for meeting student needs and providing the necessary education to special education students. Of course, some special education teachers have slightly higher caseloads due to their classroom assignment or their particular role in the building. However, when speaking with special education teachers, the Audit Team continually heard that they were overworked, with some indicating feelings of being burned out. After observing the special education teachers in the school buildings, examining their caseloads, and studying their schedules, the Audit Team recognized that there are incongruities between the caseload and the workload of the special education teachers in District 64. What they express as having too many students on their caseload is actually a workload that is challenging, which is the common dynamic of caseload versus workload.

When examining caseload versus workload, it is important to consider the students on each special education teacher's caseload. There are special education students who have more extreme needs than other students and may require considerably more one-on-one time as compared with other students having less severe needs, thus contributing to a greater workload than caseload. It is important for building administrators, who often set the schedule for special education teachers, as well as Student Services Department leadership, to recognize that simply examining total number of students on a special education teacher's caseload is not necessarily a true representation of that teacher's workload. Not all students are the same. Some students require a much higher level of support than others, and special education teachers in each building know the students better than anyone else. They have the experience and expertise to determine the amount of effort each student will require to help them meet their educational needs and the goals contained in the IEP. To remedy this issue, administrators and special education teachers should collaborate in the development of teacher caseloads. The special education teachers know the needs of the special education students better than building or district administrators because they spend every day with these students. Additionally, when setting the caseload of special education teachers, consideration should be focused on the inevitable fact that students will change during the course of the school year. Students who are enrolled at the beginning of the school year may move out of district or be placed in an alternative setting. Likewise, new special education students move into the district throughout the school year, adding to the caseload of special education teachers. Currently, most special education teachers are provided with a caseload at the beginning of the year to reflect the student population at that time. However, the district should take into consideration growth; more students will be placed into special education during the course of the school year while additional special needs students may enroll in the district.

If special education teachers are stretched thin at the beginning of the school year there will be no room to add additional students onto the caseload without negatively impacting the teachers' workload. Engaging teachers in the process of determining caseloads based on student needs and known factors of individual students will have a positive impact on the teachers' perception of their workloads while still allowing the buildings and district to maintain viable caseload to meet both student needs and personnel limitations. District 64 should develop a district-wide policy that every building collaborates with their special education teachers to develop a schedule that allows for a reasonable and workable caseload, limiting low morale and high turnover.

It is necessary for both teachers and administrators to recognize that caseloads and workloads do not remain static. There will be changes from year to year in each building based on the known student population at the beginning of the year, the projected student population, and student needs throughout the year. Scheduling based on student needs and special education teacher workload means that the required staffing for buildings will shift from year to year. Therefore, the same number of special education teachers in each building may fluctuate annually. Additionally, teachers with a particular skill set may need to move to a different building where there are student needs that require a particular skill or background. Similarly, the number of special education teachers in the district may need to be adjusted based on workload needs. If additional students enter special education increasing the workload of special education teachers, then an increase in staffing may be required to meet those student needs and teacher workloads. Conversely, if staffing needs decrease in a particular building or district-wide, then the number of special education staff members may need to be reduced to reflect the student population.

In order for special education teachers to be successful and meet student needs, special education teachers need professional development and training, which occurs throughout the school year in District 64. While there is regular professional development and training, special education teachers need additional training on a number of issues, including but not limited to: consistency of IEP writing, behavior management training, co-teaching, and innovative instructional techniques, to name a few. District 64 should focus its training on identified areas of need by building and district administrators, as well as information received from the annual staffing and professional development needs assessment.

TAs are another necessary and important component of supporting students with special needs in District 64. TAs may be assigned to spend a portion of the day in a particular classroom or may be assigned to a particular student. Best practices suggest that TAs be assigned to students who need one-on-one support during the school day based upon the students' IEP, due to a physical disability, safety concerns, or a significant special need. The TA usually spends much of the day with an assigned student to ensure they transition from class to class and assist them with their learning throughout the school day. Some students require a TA as a component of an IEP and should have a TA assigned to them. However, there are some District 64 students who have TA minutes as a component of their IEP who may not need them. Often parents and advocates believe that the more services they can get for their child on an IEP, the better off that child will be. An IEP should only contain the necessary supports to achieve the student goals included in the IEP. Student IEPs should be reexamined at the time of re-evaluation to determine if the TA minutes contained in the IEP are still consistent with student needs and IEP goals.

TAs in some buildings are occasionally pulled away from their primary responsibilities to act as a substitute in a classroom or to assist with an emergency situation in a building, such as a student behavior issue. In some buildings, TA responsibilities have evolved from supporting students academically in the classroom to providing health and safety support for the building. Some are pulled away from their intended duties to address issues that arise in the building. While it may be convenient to have an onsite substitute readily available or a building troubleshooter to call upon, this is not the intended role of the TA. TA responsibilities must be examined and the roles must be tied back to supporting special needs students as required in an IEP.

TAs need to receive both internal coaching and external training. District 64 provides some training for TAs at the district level, but the training should be increased in frequency and more focused on areas of need based upon the responsibilities of the TAs. The district has offered additional training to TAs after school hours with compensation; however, attendance is not mandatory and is often light. The district has also developed a TA handbook that has been shared with all TAs. TAs need to receive coaching from their assigned special education teachers. Special education teachers are professional educators who have special education degrees and understand the supports that students need in the classroom. Many TAs do not have an education degree, and some have limited experience in education. TAs need coaching support from special education teachers to guide them on the proper way to support students and to effectively integrate into the classroom for the educational benefit of students. More broadly, TAs need external training on effectively providing support to students, prompting student responses, confidentiality of student information, and in some cases, overall general training on special education, just to name a few topics. Training for TAs is necessary and should be required to ensure that all TAs understand their roles and responsibilities.

School psychologists play a vitally important role in the special education structure of schools in District 64. The role of the school psychologists is critical for the students that they serve, providing psychological and developmental supports for struggling students. There are many students who benefit from supports provided by the school psychologist, both special education students and general education students. The caseload of students for a school psychologist is high in most school districts, including District 64, particularly following the COVID-19 pandemic. In nearly every school in District 64, there are a greater number of students in need of service by the school psychologist than hours to support those students.

In addition to meeting with students one-on-one or in small group settings, school psychologists in District 64 play an important role in the administration of student IEPs. School psychologists typically are involved in the initial evaluation process for determining eligibility. That requires school psychologists to perform initial evaluations in addition to their regularly caseload. Additionally, school psychologists are an integral component of the IEP meetings in District 64. Because of their role in evaluating students both for the initial entry into special education and throughout the student's time in special education, school psychologists are present and play an active role in IEP meetings. In some cases, school psychologists often serve as LEA in the IEP meetings when Student Services Coordinators or administrators cannot attend. Essentially in District 64, school psychologists are engrained in the special education system not only to provide services to students but also to ensure that students are properly evaluated to determine the goals and services included in the IEP. However, despite that integral role in special education in District 64, school psychologists are shared between buildings. In the elementary buildings, school psychologists are assigned to at least two school buildings in the district and divide their time between the buildings based upon need.

Because of the critical role that school psychologists play in the IEP process and in providing services to students, each building in the district could use additional time with a school psychologist to meet building and student needs. It is the recommendation of the Audit Team that District 64 should hire a school psychologist for each building within the district and ensure that the school psychologist only has responsibilities in one building.³ Given the current responsibilities of the school psychologists, it is not sufficient to share school psychologists between buildings, nor is it in the best interest of students and staff. While the Audit Team realizes that this recommendation will increase personnel costs to the district, we believe that it would be a good investment for each of the schools and yield positive impacts on students and the school communities.

District 64 has a valuable position in the form of Student Services Coordinators. The current Student Services Coordinators are all very experienced and knowledgeable special educators and true assets to the district and the

³ It is important to note that there is currently a national shortage of school psychologists, so this recommendation may take time to fully implement if the district chooses to do so.

schools they serve. The Student Services Coordinator role has been in existence in the district for a number of years but has varied and changed over time. The original intent of the Student Services Coordinator role was to provide special education support to special education teachers, TAs, and related services personnel in the buildings, as well as provide support for the buildings on special education issues. Currently, the Coordinators are shared between two schools. The Student Services Coordinator role has evolved over time to be less focused on supporting special education teachers, TAs, and related services personnel and more focused on troubleshooting special education issues in the buildings. Student Services Coordinators are currently spending less time with special education teachers on training, coaching, and mentoring. Instead, their many responsibilities often only allow for quick check-ins with special education teachers and other special education team members to address problems/crisis situations in the buildings.

The role and assignment of the Student Services Coordinators needs to be revisited. District 64 should recognize that the current responsibilities and building assignments are stretching Student Services Coordinators so thin that they are not as effective as they could be with the singular focus of supporting special education teachers and special education generally in one school building. It is the Audit Team's strong recommendation that District 64 consider reallocating some of its IDEA grant money to allow for one Student Services Coordinator assigned to each school. That Student Services Coordinator should focus solely on providing supports to their assigned school and the special education teachers, TAs, and related services personnel within that school. The benefits of doing this include the Student Services Coordinators having the ability to develop a rapport with the school special education community and general education classroom teachers in the building. They could also provide training, mentoring, and coaching to special education teachers and TAs and provide special education training to general education teachers so that the general education teachers can better support all of their students in the classrooms. Furthermore, the Student Services Coordinators could provide supports to the building administration on all special education issues in the building. The Student Services Coordinators should be a direct pipeline of information on updates and new initiatives from the Student Services Department to the individual school buildings and personnel, as well as a resource to ensure that the new initiatives are being implemented and training for new initiatives is provided.

Recommendations

- 1) Evaluate the workload of special education teachers in each school building in the district and create a district-wide process that considers special education workload in the assignment of caseload.
- 2) Provide professional development and training to all special education teachers on topics like consistency of IEP writing, behavior management training, co-teaching, innovative instructional techniques for special needs students, and any other relevant training topics, in addition to the training currently offered for special education teachers in the district.
- 3) Review the role of the TAs in the district and ensure alignment of supports with student IEPs.
- 4) Allow special education teachers to provide coaching to TAs to enhance the supports that TAs provide in classrooms and with students.
- 5) Provide additional and required training to TAs on topics like effectively providing support to students, prompting student responses, confidentiality of student information, and special education in general, in addition to the training that TAs are currently offered in the district.
- 6) Add school psychologists in the district to ensure that each school within District 64 has its own dedicated school psychologist assigned only to that building.
- 7) Increase the number of Student Services Coordinators so that each school within District 64 is assigned one dedicated Student Services Coordinator.

Observation #7: Revisit the Student Behavior System in District 64

Special educators in each of the buildings—special education teachers, TAs, and related services personnel—are expected to fulfill many different roles, beyond their job responsibilities alone. One of these added responsibilities is addressing student behavioral issues. Most special education teachers in District 64 have extensive training and degrees in special education but do not necessarily have specialized training, certificates, or degrees in behavior management. Most TAs have even less formal training on behavior management and have mostly learned behavior interventions on the job. The related services personnel, specifically school psychologists and social workers, often have the most experience addressing behavior issues but may or may not have any formal training. Due to their areas of expertise, they are often called upon to address significant student behavioral issues.

School buildings throughout the district have developed a process for addressing student behavior needs. Each school has identified special education teachers, TAs, and/or related services personnel to be included in a behavior incident response team. These individuals have received the Crisis Prevention Institute's ("CPI") Nonviolent Crisis Intervention training, which equips individuals with strategies for safely defusing hostile or violent behavior among students. These trained educators are part of the CPI Team within the school buildings. When there is a behavior incident escalating or occurring, the process for engaging the CPI Team is that the teacher calls the office and the alert is sent via radio to the CPI Team members who all carry radios with them. Depending on the level of behavior incident, appropriate and available CPI Team members respond to the call. Most CPI Teams in the buildings meet on a regular basis to discuss student behavior needs and incidents, where they can debrief and engage in problem solving as a team.

The CPI Teams are a very good solution to behavior needs in buildings within the district. The Team members are well-trained and quick to respond to incidents. One area of concern is that the CPI Teams have limited members, typically related services personnel like school psychologists and social workers, along with some special education teachers and TAs. While these CPI Team members are very skilled at addressing student behavior needs, each of them has other primary responsibilities in the schools. When a student behavior call for assistance is made, often the CPI Team members need to leave the students who they are working with in the classroom or in counseling sessions to respond to a behavior crisis. While the schools and CPI Team members make this system work, and have done so very capably, there is the issue of non-behavior incident students missing out on classroom instruction and/or support minutes. While the district has an impressive 117 staff members trained on CPI, the Audit Team recommends providing CPI training to additional building staff members so there is a greater pool of adults to draw upon when behavior crises occur and interventions are needed.

The issue of having qualified adults to address the behavior needs of students in the schools is compounded by the fact that behavior incidents are on the rise. This is a national trend, seen in nearly every state, and is occurring in District 64, as well. Not only are behavior incidents on the rise across the country, but significant behavior issues are on the rise. Current behavioral challenges are no longer simply students acting up in class and requiring a reminder of appropriate behavior. Behavior incidents now include actions that put others (adults and students) in danger, students putting themselves in danger by exiting school buildings without permission, students engaging in activities that could cause themselves harm, physical attacks on teachers and/or other students, just to name a few. In order to combat these increased behavior incidents, both extreme and more mundane, school districts need to have trained behavior management experts on staff to address the needs. In District 64, there is one BCBA for the district who is shared among all of the buildings. The current BCBA is excellent and does a fantastic job of working with building-level personnel to provide behavior supports and is often called to a building when there is a more extreme behavior incident. However, because the one BCBA is divided among all of the buildings, it is impossible to be onsite for all significant behavior incidents. Often, by the time the BCBA has arrived at a building, the CPI Team has already responded and the

incident is being addressed. While BCBAs are in high demand in schools across the country and often difficult to hire, District 64 should consider hiring at least one more BCBA for the district, possibly more if budget and availability allow. With additional BCBAs in the district, these individuals could be more actively involved in behavior incidents and provide additional behavior training to all teachers, TAs, and related services personnel, which could ultimately limit the reliance on the CPI Teams to respond to most behavior incidents.

There are a few students in the district who have significant behavior needs and have recurring behavior incidents on a daily basis in the school buildings. While some of these students have been transitioned to alternative settings outside of District 64, there are some students who remain in District 64 school buildings or have been transitioned back into the district from outplacement locations. It is a challenge for building and district leaders to place students with extreme behavior incidents in classrooms within the district. Placing a student with ongoing behavior incidents in a traditional classroom setting is disruptive for the other students in the classroom and the teacher, and there is often little learning that occurs during behavior outbursts. Instead, the Audit Team observed that several schools within the district placed students with extreme behavior needs in self-contained classrooms within the district. While those classrooms have a smaller number of students who are impacted by behavior outbursts, the classrooms also typically have students with the greatest special needs in the building. It is difficult for special education teachers and TAs to manage both the needs of their students and also the behavior outbursts of one or more students with heightened behavior incidents in the classroom. District 64 should develop a more effective strategy to address the needs of students who regularly exhibit extreme behaviors. The current placement in self contained classrooms and reliance on teachers and TAs in those classrooms is not an effective approach for addressing significant behavior incidents in the school buildings.

Recommendations

- 1) Provide additional CPI training to an expanded number of special education teachers, TAs, and related services personnel in each school building within District 64 to alleviate the dependence on the existing CPI Team members and increase the number of staff to address behavior incidents.
- 2) Consider hiring additional BCBAs for more targeted behavior training and supports for schools within the district.
- 3) Develop a more effective strategy to address the needs of students who regularly exhibit extreme behaviors and a standard system of review for determining where to place students in District 64 schools.

Observation #8: Improve the Student Services Department Roll Out of Initiatives, Communication, and Visibility in the School Buildings

District 64 has a strong Student Services Department leadership team in the Director of Student Services and the Assistant Director of Student Services. Both are very knowledgeable regarding special education compliance and best practices, and both have years of practical experience as special educators. Through the Audit Team's interviews with special education teachers, TAs, related services personnel, and others in the school buildings, a majority of those interviewed indicated that they have professional respect for the knowledge, experience, and credentials of the leadership team in the Student Services Department; however, many expressed frustration over the lack of personal connection with the Director and Assistant Director, challenging communication, and visibility in the school buildings. It is important to recognize that some of the lack of in-person contact was due to restricted access to buildings during the COVID-19 pandemic. However, now that buildings are open and more readily accessible, the Audit Team's recommendation is to increase regular visibility within the school buildings.

The Student Services Department is responsible for all special education services in District 64. The Director and Assistant Director are the face of that department both to the staff and to parents of special needs students. To be optimally successful the Student Services Department leadership team needs to hold the trust and respect of the districts' special education staff. Since the Student Services Department leadership team has joined the district nearly four years ago, there have been monumental changes in the systems, processes, and procedures for special education in District 64. These are primarily positive changes, some of which were informed by the 2018 Audit and others are simply best practices in special education, that have updated the special education practices in District 64. While not everyone in special education in the district has embraced all of the changes put in place by the Student Services Department Leadership team, some in collaboration with district personnel, these changes were necessary and appropriate to move District 64 forward and realign/update practices in special education.

One of the reasons not all of the changes in special education in the district have been embraced is the process for which new initiatives, systems, processes, and procedures were rolled out. New initiatives, systems, processes, and procedures cause tremendous stress and change of daily routine for special educators on the ground in school buildings. There should be a process for adaptation to the changes, however positive, that is borne by the special education teachers, TAs, related services personnel, and administrators in the school buildings. Rollout of change is critical for the success of new initiatives, systems, processes, and procedures. Ideally, educators in the school buildings would be a part of the development of those changes to ensure buy-in and a willingness to adapt to new ideas. Whether that occurs or not, the rollout of new initiatives, systems, processes, and procedures should be explicitly communicated at district-wide special education meetings. This rollout should include an explanation of what changes are being made, why they are being made, and how those changes will positively impact students. There is no doubt that the Student Services Department has thought through the "what," "why," and "how" questions while developing initiatives or changes, but district personnel reported to the Audit Team that those explanations are not being communicated effectively to building leaders and special educators. As a result, these new changes or initiatives are not always fully adopted and effectively administered in the school buildings. It is human nature for educators to default to past practices that may seem easier or more familiar to implement rather than changes brought about by new initiatives, systems, processes, and procedures designed to address difficult issues. As a result, the Student Services Department should ensure that they collaboratively develop new initiatives, systems, processes, and procedures with the school-based special education teams to the greatest extent possible, as well as allow for input and fully explain the purpose and benefit for students and/or teachers of changes made in special education.

There are two areas that can augment the relationship between the Student Services Department leadership team and building-level administrators and special education teams: communication and visibility. There is regular

and on-going communication from the Student Services Department, typically from the Director, to special education staff members through email communication and through communication by Student Services Coordinators. While this communication contains a tremendous amount of information and directives related to special education, it is not the optimal method for announcing or implementing new special education initiatives, systems, processes, or procedures.

Effective communication is a two-way street, meaning that those receiving the information must be engaged to hear it and must have an opportunity to respond to it. There needs to be rapport built with staff in order for them to hear and respond to communication from the Student Services Department. One effective way to do this is to initiate district-wide special education staff meetings. The Student Services Department has monthly special education department meetings, as well as an annual school year kickoff meeting. At the kickoff meeting at the beginning of the school year, the Director and Assistant Director should take this opportunity to methodically lay out their vision for the Student Services Department and special education for the upcoming school year. This should be done in conjunction with welcoming the staff and celebrating department successes and individual contributions, all with the goal of creating a team mentality for the Student Services Department. Additionally, the monthly special education department meetings should have a twofold purpose: 1) to allow the Director and Assistant Director to provide updates and rollout new initiatives and 2) to allow time and space for staff members to provide feedback, ask questions, and address challenges. Staff members want to have a voice in the new initiatives and directives. They want to hear the “why” of new initiatives and “how” they will happen, thus providing a vision for the entire department that all of the staff members understand and embrace. This is the type of rapport building that should occur in the Student Services Department.

The second area to augment the relationship between the Student Services Department leadership team and building-level administrators and special education teams is visibility. Visibility of the Director and Assistant Director in the school buildings is not as frequent or meaningful for the special education teams as it could and should be. Both the Director and Assistant Director are in buildings as needed for administrative meetings, challenging IEP meetings, and significant issues involving students. However, they are not regularly present in special education classrooms. There should be more onsite visits to observe in special education classrooms in non-evaluative ways, simply to check in with special education teachers, TAs, and related services personnel. It is important to see first-hand how initiatives are working, what challenges educators are facing in the classrooms, and provide an opportunity for personal interaction between the Student Services Department leadership team and the special education practitioners. These visits do not need to be lengthy but should occur regularly. Praise the special education staff when there are highlights during the classroom visit; offer suggestions when struggles are observed. Be a visible presence in the school buildings so that special education team members develop a relationship with the Student Services Department leadership team.

District 64 is engaging in a search for a new Student Services Director, following the retirement of the current Director. While there are many factors to consider in hiring a new Director, one of the greatest responsibilities of the new director will be developing relationships with building administrators, special education teachers, TAs, and related services personnel. The new Director will have an opportunity to initiate the recommendations contained in this report for rolling out changes, enhancing communication with building-level special education team members, and having a more visible presence in the school buildings.

The current Student Services leadership team has been conscientious stewards of the district’s Student Services Department budget and special education financial resources. One area where the Audit Team recommends further examination is the Medicaid reimbursement for special education students. While the administrative team members in the district office responsible for Medicaid reimbursement do an excellent job of collecting and reporting information, and the Medicaid billing company that the district utilizes fulfills its responsibilities, the Audit Team recommends a review of the Medicaid reimbursement claims to ensure that District 64 is maximizing its Medicaid reimbursement. There should be a review of Fee for Service claims, Administrative

claims, and student transportation claims to capture all billable service for the district and ensure optimization of the Medicaid reimbursement claiming process.

Recommendations

- 1) Develop a process for rolling out new initiatives, systems, processes, and procedures for the Student Service Department and special education teams in the buildings that includes in-person meetings, educator involvement in the development, and an explanation of the benefits for students and teachers.
- 2) Provide direction and a vision for the school year, and celebrate staff accomplishments, at the annual Student Services Department school year kickoff meeting.
- 3) Discuss new initiatives, explain the “why” and “how” of changes in special education, and provide an opportunity for special education team members to ask questions and actively engage in discussion during the monthly Student Services Department meetings.
- 4) Carve out time in the Director and Assistant Director schedules for in-person onsite visits in each of the schools. Select a few classrooms to visit each week so that all classrooms in each building are visited in a rotation.
- 5) Review special education Medicaid reimbursement in the district, including Fee for Service claims, Administrative claims, and student transportation claims, to capture all billable service for the district and ensure optimization of the Medicaid reimbursement claiming process.

Observation #9: Enhance the Partnership with Parents of Special Needs Students in District 64

District 64 is a district that has an active and engaged parent community, particularly among special education parents. District 64 parents are often highly educated, well-informed on special education rules and procedures, and actively involved in their students' education. This is a tremendous asset in the district. It certainly was during the Special Education Audit where special education parents attended a virtual parent night meeting and completed surveys to assist with the Audit process.

Parents are typically fierce advocates for their special needs students. They have often fought for the entire life of their child to ensure that the child receives medical supports, educational supports, and other supports at each developmental stage of life. This is admirable and often necessary to ensure that their child has the necessary benefits to survive. However, it is also important for parents to understand the special education law (IDEA), how it functions, and why it functions in that way. For example, IDEA is designed to have parental involvement throughout the process of identifying a student for special education, developing and planning goals in the IEP, and requiring regular check-ins to assess and report how the student is progressing. Many parents come to school districts in a mode to fight for what they want rather than collaboratively determining, along with professional educators, what is in the best interest of their child from an educational standpoint. An adversarial mentality from parents or the school district is not constructive for identifying and implementing the supports needed for special education students.

Parents need to be informed about the structure of District 64 special education so they have a deep understanding of the instructional model in the district and how it impacts their student(s). From a student referral that provides tiered supports in MTSS, to the data collection and progress monitoring of the student, to the possible entry into special education if needed, parents must understand the educational process for all students in the district. The special education system that is in place in District 64 exists for all students in every case. Parents cannot simply demand that a student receive special education services, in most cases, without Tier 2 and Tier 3 interventions in general education first. And students cannot be placed into special education without appropriate data to demonstrate the need for special education services. Some parents engage third party medical or related services providers to examine and evaluate their student. Third party medical reports are a valuable piece of evidence to consider when determining placement of a student in special education. However, under IDEA school personnel must collect educational data and data from district related services personnel to analyze and determine if school and district data supports or contradicts the data provided by third party medical providers. Medical providers must adhere to their standards of providing medical diagnoses and recommended treatments for students. Educators must do the same to ensure that their determination of placement in special education is in conformity with IDEA to provide educational services. Determinations from the school district and third party providers are not always in alignment, and the district should provide parents with the information needed to understand why that is the case. The school district is obligated to provide supports to the student. Those supports can be through general education or in special education, but only if the data supports student placement in special education.

There is a common misconception among some parents of special needs students that once a student is placed in special education that student will be there for their entire educational career. That may be true in some cases, but it is not universally accurate. IDEA requires a reevaluation of special education students at a minimum every three years, with analysis and monitoring of data throughout the years in between. One of the goals of IDEA is to provide supports to students so that they may actually be able to exit the special education system and reintegrate into the general education classroom. This notion is often in direct conflict with parental expectations that their student will receive continuous additional supports throughout the remainder of their educational experience in the district and beyond. It is completely understandable that parents do not always understand the IDEA framework that schools must work within to provide educational supports to students, which may be shorter in duration and possibly less holistic than expected. District 64 has developed a website

for parents and a variety of parent resources that assist parents with understanding special education and the services their child receives. Additionally, District 64 should develop parent information resources in the form of in-person education sessions for parents of newly identified students with special needs and additional written policies and procedures for parents to know what to expect from the district as their students are being evaluated for special education and possibly placed in special education.

District 64 and the Student Services Department have developed a wonderful resource for parents to be involved in the district and gain a better understanding of special education within the district through PT3. This organization in District 64 brings administrators, teachers, TAs, related services personnel, and parents together to involve parents in promoting special education in the district. Currently, PT3 is open to a limited number of parents in the district. However, PT3 could be expanded to include more parents and district personnel to enhance and broaden the dialog regarding special education in the district. PT3 could evolve into an organization that more closely resembles a PTA or PTO that is open to all parents of special needs students in the district and is collaboratively directed by district personnel and parents together. This could be a great resource for disseminating information to all interested parents of special needs students, while providing a venue for parents to ask questions, get clarification, and gain understanding of special education in District 64.

Recommendations

- 1) Institute in-person parent education sessions and develop additional written resources for parents that describe and explain special education in District 64, including both visual representations and written descriptions of the instructional model for the district, as well as procedural information regarding processes for IEP meetings and expectations of all parties attending IEP meetings.
- 2) Expand PT3 to include all interested parents of special needs students and establish the organization as a setting for disseminating information to parents of special needs students, while providing a venue for parents to ask questions, get clarification, and gain understanding of the special education system in District 64.

Observation #10: Reevaluate Specialized Educational Offerings in District 64

District 64 currently has some innovative, specialized educational offerings for students with special needs. The newest offering is the Structured Learning Community (“SLC”) unit housed at Washington Elementary School that serves many of the district’s students with the greatest special needs on the Autism spectrum. This unit is comprised of a dedicated team of a special education teacher, TAs, and related services personnel who work in tandem to provide specialized support to the students who are served in the SLC classroom. The SLC is an excellent offering for students who need specialized supports, and District 64 should be commended for recognizing these specialized needs and developing the SLC to address them. However, the rollout and development of the SLC has not been smooth.

The SLC was created and launched during the COVID-19 pandemic, which was, at best, a difficult time to initiate a new offering. During the first year of the SLC, an experienced special education teacher was selected to lead and develop the SLC. There were also TAs assigned to the SLC, but most of the TAs did not have experience with students on the Autism spectrum and were provided with limited specialized training to assume the role of TAs in the SLC. The SLC was very isolated in its initial rollout as it was the only classroom with in-person learning during that period of the COVID-19 pandemic. Despite the excellent concept of the SLC, the special education personnel staffing the SLC were not provided with all of the necessary training to launch a large, new initiative in District 64.

District 64 should further define the direction and maximize the potential of the SLC. Currently, the SLC has a full time, dedicated special education teacher and cohort of TAs in the classroom. The TAs should be dedicated in the SLC and used exclusively within the SLC. Likewise, if the SLC is going to be expanded to serve additional students, it should have full time, dedicated related services personnel (OT, PT, SLP) who serve students only in the SLC. They should be in the SLC classroom throughout the day to support students in the SLC.

Student behavior continues to be a challenge in District 64, as discussed previously in this report. District 64 must provide support for its students with behavior needs. The district has discussed creating a separate behavior unit in District 64. A behavior unit housed within one of the district buildings, serving students from schools throughout District 64, could be a tremendous asset to the district and a benefit for students with significant behavior needs. A behavior unit to support students throughout the district must also have full time, dedicated staff who are specially trained to support students with significant behavior needs and respond to behavior incidents. Similar to the SLC, a behavior unit should have teacher(s), TAs, BCBA(s), and other needed personnel who are exclusively assigned to the behavior unit and focus all of their supports on students assigned to the behavior unit with significant behavior issues.

The SLC is an offering that District 64 should continue to provide and further develop. The SLC has the potential to be a model support unit for District 64, but the teachers and students need the resources and continued support of the district to allow it to grow. There were suggestions while the Audit Team was present in District 64 that the district might consider creating an additional SLC in another building or a behavior unit. While the Audit Team encourages the creation of innovative offerings to support students with special needs, District 64 should ensure that the current SLC has the vision, direction, and resources it needs prior to adding additional specialized educational offerings. The special educators working in the SLC, particularly the TAs, need training and professional development to support the students that they serve in this important but challenging classroom setting.

Another specialized educational offering that District 64 provides for its families is a preschool at Jefferson School. There is a morning and afternoon preschool with five blended classrooms and two instructional

classrooms. The preschool is a play-based environment for student development, and most of the special needs students in the preschool have mild to moderate special needs. The preschool concept is excellent for District 64 and has been in place for a number of years. For students with special needs, the preschool provides an opportunity to reevaluate students for special education services before they transition to kindergarten. District 64 should consider expanding its preschool to accommodate more students in future years. However, Student Services Department leadership and district leadership need to take a more hands-on approach at the preschool. Leadership at the preschool lacks support and direction, and the teaching staff in the preschool seems to feel empowered to chart their own course with their students rather than follow a district plan. Many of the educators at the preschool have been in their roles for many years and seem to take the approach that they run the preschool. District 64 leadership needs to reassert that the preschool at Jefferson School is part of a larger district plan, provide oversight to the school leadership, and issue specific guidance and direction for the preschool teachers.

Recommendations

- 1) Develop detailed plans, benchmarks, and measures for success for the rollout of new specialized educational offerings in District 64.
- 2) Provide district vision and goals for the SLC and provide the necessary training and professional development for the educators working in the SLC classroom.
- 3) Consider creating a behavior unit for District 64 to exclusively serve students with significant behavior needs and staffed with dedicated behavior specialists serving as teachers, TAs, BCBAs, and other needed personnel.
- 4) Establish the preschool at Jefferson School in the larger district plan, provide oversight to the school leadership, and issue specific guidance and direction for the preschool teachers.

Prioritization of Recommendations

Recommendations to be Completed by December 31, 2022

<u>Observation</u>	<u>Recommendation Number and Page Number</u>	<u>Recommendation</u>
Observation #1	Recommendation #2; Page 14	Establish and utilize a data system to determine when students transition from one model of instruction to another based on student data and not heartfelt data.
Observation #2	Recommendation #3; Page 19	Review student IEP eligibility to confirm that student needs have not changed and all IDEA guidelines are consistently followed; ensure the collection and analysis of current student data in order to make appropriate educational decisions.
Observation #2	Recommendation #4; Page 19	Provide training as needed for special education teachers, general education teachers, related services personnel, and/or administrators on IDEA, including the processes and procedures for determining eligibility/placement into special education to ensure compliance with federal law and district educational obligations to the student.
Observation #3	Recommendation #1; Page 21	Provide joint professional development for general education teachers and special education teachers on differentiated instruction, creating inclusion classrooms, and implementing co-teaching in the classroom so that these concepts become more mainstreamed and consistent throughout the district.
Observation #3	Recommendation #2; Page 21	Establish common planning time for general education teachers and special education teachers who will be co-teaching together so that they can jointly prepare their lessons for the greatest student impact.
Observation #3	Recommendation #3; Page 21	Develop a monitoring system to monitor if the co-teaching implemented in the classrooms is appropriate and effective for advancing student achievement.
Observation #5	Recommendation #2; Page 28	Provide special education teachers, TAs, and related services personnel with additional professional development and training on how to accurately collect data, how to utilize data, and how to preserve data as a vital component of a student's file for evidence and future decision-making.
Observation #6	Recommendation #3; Page 32	Review the role of the TAs in the district and ensure alignment of supports with student IEPs.
Observation #6	Recommendation #4; Page 32	Allow special education teachers to provide coaching to TAs to enhance the supports that TAs provide in classrooms and with students.
Observation #7	Recommendation #1; Page 34	Provide additional CPI training to an expanded number of special education teachers, TAs, and related services personnel in each school building within District 64 to alleviate the dependence on the existing CPI Team members and increase the number of staff to address behavior incidents.
Observation #8	Recommendation #2; Page 37	Provide direction and a vision for the school year, and celebrate staff accomplishments, at the annual Student Services Department school year kickoff meeting.
Observation #8	Recommendation #3; Page 37	Discuss new initiatives, explain the "why" and "how" of changes in special education, and provide an opportunity for special education team members to ask questions and actively engage in discussion

		during the monthly Student Services Department meetings.
Observation #8	Recommendation #4; Page 37	Carve out time in the Director and Assistant Director schedules for in-person onsite visits in each of the schools. Select a few classrooms to visit each week so that all classrooms in each building are visited in a rotation.
Observation #10	Recommendation #2; Page 41	Provide district vision and goals for the SLC and provide the necessary training and professional development for the educators working in the SLC classroom.

Recommendations to be Completed by June 30, 2023

Observation	Recommendation Number and Page Number	Recommendation
Observation #1	Recommendation #1; Page 14	Develop a student instructional model that provides a clear framework for establishing special education as a continuum of services. This framework should be jointly developed by district administration, building leaders, special education teachers, and related services personnel. The framework should be developed as a collaborative effort of all essential parties, with outside supports as needed, and rolled out to the both special education personnel and general education teachers as a collaboratively created framework.
Observation #1	Recommendation #3; Page 14	Provide both special education personnel and general education teachers additional training on models of instruction and instructional methods for special education students. The supports provided to students need to be effectively linked to the goals of the IEP, and both special education teachers and general education teachers need to be able to recognize the instructional methods needed for students to succeed.
Observation #2	Recommendation #2; Page 18	Augment training to special education teachers, general education teachers, and related services personnel for all interventions that are included in the clearinghouse of available interventions, including why to consider them, when to integrate them into the array of supports for a student, and how to effectively utilize them.
Observation #4	Recommendation #1; Page 26	In collaboration with district leadership, general education teachers, special education teachers, and potentially an outside provider, develop a true MTSS framework that can be implemented district-wide, with every building following the principles contained within the MTSS.
Observation #4	Recommendation #2; Page 26	Establish a clear path for how a student moves from Tier 3 in MTSS to special education and institute standards so there is an authentic difference between Tier 3 interventions and special education instruction.
Observation #6	Recommendation #1; Page 32	Evaluate the workload of special education teachers in each school building in the district and create a district-wide process that considers special education workload in the assignment of caseload.
Observation #6	Recommendation #2; Page 32	Provide professional development and training to all special education teachers on topics like consistency of IEP writing, behavior management training, co-teaching, innovative instructional techniques for special needs students, and any other relevant training topics, in addition to the training currently offered for special education teachers

		in the district.
Observation #6	Recommendation #5; Page 32	Provide additional and required training to TAs on topics like effectively providing support to students, prompting student responses, confidentiality of student information, and special education in general, in addition to the training that TAs are currently offered in the district.
Observation #8	Recommendation #1; Page 37	Develop a process for rolling out new initiatives, systems, processes, and procedures for the Student Service Department and special education teams in the buildings that includes in-person meetings, educator involvement in the development, and an explanation of the benefits for students and teachers.
Observation #10	Recommendation #4; Page 41	Establish the preschool at Jefferson School in the larger district plan, provide oversight to the school leadership, and issue specific guidance and direction for the preschool teachers.

Recommendations to be Completed by December 31, 2023

<u>Observation</u>	<u>Recommendation Number and Page Number</u>	<u>Recommendation</u>
Observation #2	Recommendation #1; Page 18	Develop a comprehensive, district-wide instructional model for District 64, similar to the Proposed Instructional Model for District 64 graphic. Implement that model in every school and ensure it becomes the standard that is used throughout District 64 when determining eligibility and/or making IEP/programmatic decisions or changes.
Observation #5	Recommendation #1; Page 28	Develop and implement a district-wide data policy that creates a standard for special education data collection, usage, and storage that is focused on student achievement and placement, interventions, and supports.
Observation #7	Recommendation #3; Page 34	Develop a more effective strategy to address the needs of students who regularly exhibit extreme behaviors and a standard system of review for determining where to place students in District 64 schools.
Observation #8	Recommendation #5; Page 37	Review special education Medicaid reimbursement in the district, including Fee for Service claims, Administrative claims, and student transportation claims, to capture all billable service for the district and ensure optimization of the Medicaid reimbursement claiming process.
Observation #9	Recommendation #1; Page 39	Institute in-person parent education sessions and develop additional written resources for parents that describe and explain special education in District 64, including both visual representations and written descriptions of the instructional model for the district, as well as procedural information regarding processes for IEP meetings and expectations of all parties attending IEP meetings.
Observation #9	Recommendation #2; Page 39	Expand PT3 to include all interested parents of special needs students and establish the organization as a setting for disseminating information to parents of special needs students, while providing a venue for parents to ask questions, get clarification, and gain understanding of the special education system in District 64.

Recommendations to be Completed by June 30, 2024

<u>Observation</u>	<u>Recommendation Number and Page Number</u>	<u>Recommendation</u>
Observation #4	Recommendation #3; Page 26	Provide general education teachers and special education teachers with continued professional development and training on how to appropriately progress monitor students, how to collect individual student data to determine the success of interventions, and how to create a portfolio of student intervention data that could help to inform the need for placement into special education.
Observation #6	Recommendation #6; Page 32	Add school psychologists in the district to ensure that each school within District 64 has its own dedicated school psychologist assigned only to that building.
Observation #6	Recommendation #7; Page 32	Increase the number of Student Services Coordinators so that each school within District 64 is assigned one dedicated Student Services Coordinator.
Observation #7	Recommendation #2; Page 34	Consider hiring additional BCBAs for more targeted behavior training and supports for schools within the district.
Observation #10	Recommendation #1; Page 41	Develop detailed plans, benchmarks, and measures for success for the rollout of new specialized educational offerings in District 64.
Observation #10	Recommendation #3; Page 41	Consider creating a behavior unit for District 64 to exclusively serve students with significant behavior needs and staffed with dedicated behavior specialists serving as teachers, TAs, BCBAs, and other needed personnel.

Conclusion

District 64 is an educational setting with a wealth of opportunities for its students. It is comprised of a skilled district leadership team, dedicated teachers and staff members, and a broad spectrum of students who rely on the district to equip and prepare them for their futures. In special education, the teachers, TAs, and related services personnel support students in an individualized and nurturing way to achieve their educational goals. Daily these special education team members live out the mission statement for special education in District 64 created in partnership with PT3: *Inspire every child to discover, learn, achieve, and care by recognizing every child has unique and individual needs, while fostering a learning environment that promotes every child's creativity through academic, emotional, and social development.* While there are opportunities for change, growth, and development in the Student Services Department and in special education in the school buildings, the supports provided for special education students in District 64 should be celebrated.

District 64 has all of the components needed to create a strong special education system. Some of those components may need to be altered, adjusted, rethought, or reordered, but they are all there, waiting for the educational professionals in District 64 to form them into an exemplary special educational system for students. With some time and effort, and supports along the way, District 64 can create a student instructional model and special education system where every child can learn, grow, and flourish.

While District 64 has the components to develop a strong special education system, one component is outstanding: external support for accountability. The Audit Team recommends that District 64 engage an external partner to provide quarterly check-ins for at least one year in order to assist the district in evaluating and implementing the recommendations contained in this report. This partnership of accountability will assure the district stakeholders—employees, parents, and students—that District 64 is committed to meaningful special education reforms that will strengthen its special education system and provide greater support for all students.

It has been an honor to partner with District 64 in this important Special Education Audit. ARP and the Audit Team would like to thank the district administration, building administration, special education teachers, TAs, related services personnel, staff, and parents of District 64 for their candor, open communication, and support to review and strengthen special education in the district.