Special Education Review

Chappaqua Central School District

FINAL REPORT
December 2021

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CHAPPAQUA
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PUBLIC
CONSULTING GROUP

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I. INTRODUCTION

Purpose of the Study

In January 2021 Chappaqua Central School District (CCSD) selected Public Consulting Group (PCG) to conduct an independent review of its special education services. This report describes PCG's impressions as to the current state of the special education program in CCSD and is designed to consider in its continuous improvement efforts.

The study examined the following questions posed by CCSD within its Request for Proposals (RFP):

1. Does CCSD's special education program foster effective teacher pedagogy, support, and professional development to support students with IEPs?
2. Are the district's continuum of services effectively organized to support a Free and Appropriate Education (FAPE) in the Least Restrictive Environment (LRE) for students with IEPs?
3. Does special education programming at CCSD effectively support the academic, functional, and transition outcomes of students with IEPs, thus preparing students with IEPs for college, career, and/or other post-graduation plans?
4. Does the CCSD effectively leverage Response to Intervention (RtI) for support all learners, including students who may later be identified as having a disability?
5. Does CCSD leverage its financial resources to effectively and efficiently support FAPE and LRE for students with IEPs?
6. Does CCSD effectively organize and utilize its human capital resources to effectively provide FAPE and LRE for students with IEPs?
7. Does CCSD effectively maintain an efficient and effective record-keeping system for its special education department that promotes compliance, student outcomes, accuracy, and confidentiality?
8. Do CCSD administrators and teachers effectively foster supportive, transparent, and accessible relationships with parents and other key stakeholders?

The recommendations in this report focus on priority areas that emerged from the data collection and include action steps to bolster overall planning in support of special education program improvement.

Methodology
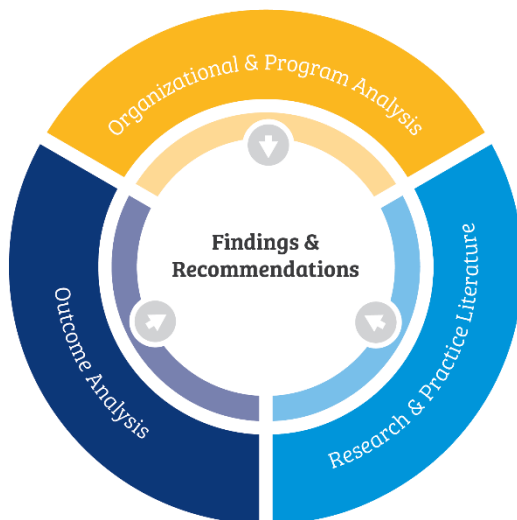
The provision of special education services resulting from a comprehensive program review requires a design that triangulates data from three sources to arrive at integrated findings and recommendations related to programs, policies, and practices and the implications for student outcomes. This program review incorporate a variety of data collecting and reporting methods as described below in detail. The first component involves the longitudinal analysis of student outcomes, achievement trends, and growth patterns at the elementary, middle, and high school levels (***Outcome Analysis***).

The second component focuses on the systemic organizational and program factors that have an impact on program effectiveness and special education student outcomes (***Organizational and Program Analysis***). This includes a document review of district policies and

procedures, program placement, staffing, and financial information.

The analyses conducted for these two components draw from the third component (***Research and Practice Literature***) which identifies the organizational factors, the program elements and practices, and the implementation conditions associated with program effectiveness and positive student outcomes.

This review approach is multidimensional, emphasizes the participation of multiple and diverse stakeholders, and includes both quantitative and qualitative data collection.

During the summer of 2021 and the fall of the 2021-22 school year, PCG conducted a mixed-methods study of the special education program in CCSD. The findings and recommendations related to programs, policies, and practices resulted from a comprehensive analysis of several data sources. Sources included (**1) Data and Document Analysis, (2) Focus Groups and Interviews, (3) Student File Review Focus Groups, (4) Classroom Visits, and (5) Staff and Parent Surveys.** These components drew from **Research and Practice Literature** to inform the findings and recommendations. PCG used publicly available achievement and financial information to compare key CCSD statistics against local district, state, and national data. The method and sources of data are triangulated to increase the validity of the conclusions, in this case, regarding program implementation, identification of gaps, and recommendations for the continued improvement of CCSD's special education programs and services.

Data and Document Analysis

Population Trends, Programs, and Achievement and Outcomes Analysis

As part of this review, PCG analyzed special education population trends, programs, and achievement outcomes. Through analysis of assessment data, educational setting data, and other indicators, the team compared student identification rates and outcomes by disability, ethnicity, gender, and other demographic variables.

Staffing Analysis

PCG team members have compiled special education staffing ratios from approximately 70 school districts (very large to very small) nationwide. The District's staffing ratios were incorporated into these data to consider CCSD staffing information in a broader context. Staffing comparison data have been used to evaluate the extent to which staff roles, responsibilities, and training are aligned to CCSD's expectations.

Document Review

PCG reviewed more than 140 documents provided by CCSD through our document request for information related to district and school structures, programs, policies, and practices.

Focus Groups

From August 2021 to November 2021, PCG conducted two sets of focus groups: (1) organizational focus groups/interviews and (2) student file review focus groups. Within this report, no focus group or interview participants are personally referred to, although position titles are referenced in some cases when necessary for contextual reasons.

Focus Groups and Interviews

To gain an understanding of how special education programs operate broadly within the District, organizational focus groups and interviews were designed to include a range of stakeholders. These focus groups occurred in August 2021 to November 2021 and included a variety of central office staff, school-based staff, and family participants. PCG worked closely with the District to determine the best outreach and communication methods for focus group and interview participation.

Focus groups generally consisted of 5 to 10 participants; parent focus groups consisted of 7 to 20 participants; while interviews were typically 2:1 or 1:1. PCG provided a sample schedule and a list of positions required to participate. In total, PCG facilitated five parent focus groups, with more than 60 stakeholders participating—general education teachers, special education teachers, related service providers, and special education chairpersons. In addition, PCG conducted 15 administrator interviews (comprised of central office administration, building principals, and assistant principals. Furthermore, PCG met with 17 teachers who signed up for post-classroom visit meetings.

During interviews and focus groups, we shared with all participants that we would maintain their anonymity. Specifically, we would not include personally identifiable information about them in the report unless we had their permission.

Specific information on the numbers on the configuration of interviews and focus groups include the following:

- In 4 out of the 8 school administrator interviews, we met with the principal and assistant principal at the same time. In 1 out of the 8 school administrator interviews, we met with the building principal separately and the assistant principals separately. In 3 out of the 8 school administrator interviews, we met with the assistant principals separately. And in 1 out of the 8 school administrator interviews, we met with just the assistant principal and not the principal.

- In 5 out of the 6 central office interviews, we met with the central office administrator alone. In 1 out of the 6 central office administrator interviews, two administrators were interviewed at the same time.

- All members of the CCSD Board of Education were invited to participate in interviews; two members participated alone.[1]

- PCG conducted 4 virtual parent focus groups. At no time did PCG meet with parents alone; however, parents had an opportunity to submit feedback via email.

- PCG conducted 17 post classroom visit interviews; each of these were voluntary and occurred during time slots selected by teachers.

In describing the outcomes of these interviews, when it is appropriate and does not reveal the individuals who provided the information, PCG quantifies the occurrence of a topic. However, in ensuring the confidentiality of participants, there are also times when PCG uses terms such as 'a few', 'some', 'several', or 'many' to refer to participant feedback.

Student File Review Focus Groups

From October through November 2021, PCG conducted student-centered file review focus groups that allowed for further discussion about school-based practices and included a review of a variety of student documents, specifically eligibility documentation, Individualized Education Plans (IEPs), and student progress reports. Through this records review, PCG focused on several topics related to special education management, student identification, programs and services, curriculum and instruction, staffing, and parent engagement, while addressing specific process questions about the development of IEPs, their implementation, and documentation. Student records were selected at random by PCG and included a wide cross-section of schools, ages, gender, and disability categories. CCSD staff provided access to the relevant Individualized Education Plans (IEPs) associated with the selected students and provided redacted

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[1] It is important to note that although two members of the CCSD Board volunteered to participate in the special education program review interviews, members of the Board and administration met with PCG when it presented on its special education program review proposed scope of work.

copies to participants ahead of meetings. An average of three student records were discussed during each focus group session.

Participants included special education teachers and individuals who both knew and did not know the student. Each group consisted of approximately four to six participants. To ensure adequate participation in each group, the Special Education Office worked in conjunction with school-based leadership to select special education staff for participation. In total, PCG facilitated 12 student file review focus groups, with more than 55 stakeholders participating.

In-Person Classroom Visits

During October 2021, PCG conducted 58 classroom visits across all six schools. PCG consultants visited classrooms to witness core instructional practices, supplementary aids and services, and approaches to differentiated instruction that should be evident within a classroom setting that supports diverse learners. These included foundational attributes to learning environments such as Universal Design for Learning and differentiated instruction. PCG's classroom visits sought evidence of the presence and implementation of:

1. Specially Designed Instruction;

2. Elements of Universal Design for Learning;

3. Student Accommodations;

4. Approaches to Co-Teaching and Consultation Teaching; and

5. Differentiation and Inclusion.

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

To select those designated for visits, PCG requested CCSD schedule classroom visits in which there were students with IEPs and the level, subject area, and placement designation. The intent was to ensure that all placement settings were represented. One PCG staff participated in each visit. Visits occurred across a three-day period that included a visitation, and a voluntary post-visit reflection with teachers who signed up to participate.

Staff and Parent Surveys

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

Parents and staff were also invited to anonymously submit feedback to PCG via email. PCG received a total of eleven emails regarding CCSD special education programming. All emails were from parents.

Survey Items

Survey items were drawn from the research and practice literature in special education and clustered to acquire data from each stakeholder group regarding the extent to which these groups perceived that policies and practices shown in the literature to support effective programming, parent involvement, and positive results for students with special needs were evident in CCSD. To the extent possible, staff and parents were asked parallel questions to gauge how perceptions about the same topic were the same or differed.

Survey Process

PCG collaborated with the District to facilitate an electronic survey process that would result in the highest possible rate of return. An announcement notice was drafted by CCSD's communication department and families were reminded to participate. All potential participants were informed of the purpose of the survey and were provided with instructions for accessing the survey online.

The staff survey was administered on October 12, 2021 and was open for two weeks. All educators, including general education teachers, special education teachers, paraprofessionals, related service providers, and building administrators, received a link to the electronic survey. Reminder emails were sent to all CCSD educators. A total of 109 CCSD staff members completed the online survey—this comprised of 29 special education teachers, 46 general education teachers, 5 paraprofessionals, 6 related service providers, 8 student support service personnel, and 2 building administrators.

A total of 104 parent surveys were completed—this comprised the following parents: 11 preschool parents; 30 grades K-5 parents; 32 grades 5-8 parents; 25 grades 9-Post graduate parents; and 6 out of district placement parents. Reminders about the survey were sent via the CCSD Communications Office.

Survey Analysis

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

Study Limitations

During this special education review, PCG encountered the following study limitations:

1. A narrow timeline to conduct classroom visits, interviews, and focus groups during the start of the 2021-22 school year. This led to scheduling challenges specifically around scheduling pre and post classroom visits; ultimately, there were no pre visits and post visits were voluntary. Nevertheless, this did not impact the integrity of the data collection.

2. Data collection for this report was conducted during the 2020-21 school year. This report represents a specific point in time.

3. PCG was intending to review a more detailed special education budget. However, the district's special education budget was not organized in a manner that allowed for school or program level analysis.

PCG's Foundational Approach

PCG approaches its work with state, county, and district organizations as a thought partner. That is, we act as an outside agent, with an objective perspective, who works alongside educational entities to recognize what is working, identify challenges and provide suggestions for improvement. We follow a mixed method Collaborative Program Evaluation model that is systematic, based upon qualitative and quantitative research methods, that produces credible and valid data to proactively inform program implementation, determine gaps, and drive recommendations for the continued improvement of the special education program. We value the importance of developing trust, open communication, and fostering collaboration between the review team and program staff.

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

Results Driven Accountability

The Individuals with Disabilities Education Act (IDEA) is a federal law that makes available a Free and Appropriate Public Education (FAPE) to eligible children with disabilities throughout the nation and ensures special education and related services are provided to those children. The IDEA governs how states and public agencies provide early intervention, special education, and related services to more than 6.5 million eligible infants, toddlers, children, and youth with disabilities and requires that each public school provide services to eligible students in the least restrictive environment (LRE) and in accordance with each student's IEP.

In the law, Congress states:

> *Disability is a natural part of the human experience and in no way diminishes the right of individuals to participate in or contribute to society. Improving educational results for children with disabilities is an essential element of our national policy of ensuring equality of opportunity, full participation, independent living, and economic self-sufficiency for individuals with disabilities.*[2]

One purpose of IDEA, as reauthorized by the United States Congress in 2004, is to assess and ensure the effectiveness of efforts to educate children with disabilities. This is done through accountability measures established by the federal Office of Special Education Programs (OSEP), state special education agencies, and, at times, special education case law.

While compliance indicators remain important, under the RDA framework, OSEP has sharpened its focus on what happens in the classroom to promote educational benefits and improve outcomes and results for students with disabilities. This change was based on data showing that the educational outcomes of America's children and youth with disabilities have not improved as expected, despite significant federal efforts to close achievement gaps. The accountability system that existed prior to the new one placed substantial emphasis on procedural compliance, but it often did not consider how requirements affected the learning outcomes of students.[3] This shift is having a great impact in guiding the priorities of special education departments nationwide. Districts across the country need to raise the level of and access to rigor in the classroom and generate a culture of academic optimism.[4]

These issues became even more significant with the March 22, 2017 U.S. Supreme Court decision in *Endrew F. v. Douglas County School District*.[5] In this decision, the Court updated its prior standard for determining a school district's provision of an appropriate education for students with disabilities. This case centered on the importance of establishing ambitious and challenging goals that enable each student to make academic and functional progress and advance from grade to grade. Progress for students with disabilities, including those receiving instruction based on alternate academic achievement standards, must be appropriate in light of their unique circumstances. Furthermore, yearly progress must be more substantial than the "merely more than de minimis" standards that had been used by some lower courts. The Court made it clear that IDEA demands more. In *Endrew*, the Supreme Court reached a balance between the standard established by the 10th Circuit and other circuits (more than de minimis) and the higher standard promoted by Endrew's parents (goal of providing students with disabilities opportunities to achieve academic success, attain self-sufficiency, and contribute to society that are substantially equal to the opportunities afforded children without disabilities). The *Endrew* decision's most significant impact in the classroom can be seen in: (1) the design and development of rigorous IEPs; (2) the implementation of students' IEPs with fidelity; and (3) increased progress monitoring of IEP goals to assess learning.

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

Special Education Effectiveness Domains

Building on extensive research, experience, and expertise serving over 5,000 school districts and state departments of education nationwide, PCG has developed this Special Education Effectiveness Framework to assist school districts in catalyzing conversations about, and reviewing and improving the quality of, their special education programs.[6]
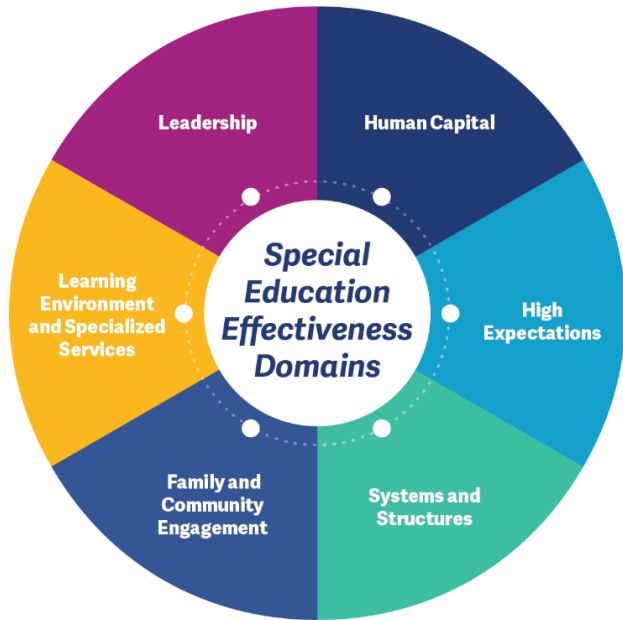
It is designed to provide district leaders with a set of practices to strengthen special education services and supports, to highlight the multidisciplinary, integrated nature of systemic improvement, and to clearly establish a pathway for districts to move toward realizing both compliance and results. An intentional focus on improving outcomes for students with disabilities leads to improved outcomes for ALL students.

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

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

Terminology

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

Committee for Special Education (CSE). The Committee responsible for students with disabilities grades Kindergarten to Post Graduate (ages 18-21).

Committee for Preschool Education (CPSE). The Committee responsible for students with disabilities ages 3 to 5 in preschool.

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

Emotional disability. The federal data reporting category of "emotional disturbance" is also reflected in New York regulations. PCG uses the less stigmatizing term "emotional disability" in charts and analyses contained throughout this report.

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

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

Paraeducators. The terms paraeducator, paraprofessional, instructional assistant, instructional aide and professional assistant are used throughout the report to describe aides who support the academic and/or behavioral needs of students with disabilities. These terms are interchangeable.

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

Speech therapists. Throughout the report, speech therapists are also referred to as speech language pathologists.

Students receiving special education services. References are made to students receiving special education services. They will also be referred to as students with IEPs or students with disabilities (SWDs). The terms are intended to be interchangeable. For this report, these references do not include students with disabilities who have 504 Plans.

Students with disabilities. In exhibits throughout the report, students with disabilities are also referred to as SWD.

II. RECOMMENDATIONS AND ACTION STEPS

CCSD has many notable strengths, including its passionate and core beliefs of inclusion, its knowledgeable staff and its willingness to undertake this review and act on the recommendations as part of a continuous improvement cycle.

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

PCG has mapped the recommendations in this report to the Special Education Effectiveness Domains. Action steps corresponding to the recommendations are included below.

Domains	Recommendations
Learning Environment and Specialized Services Delivering instruction and interventions within an inclusionary framework and with IEP fidelity, leading to increased access and progress in grade-level learning standards and reducing disproportionality	1. Multi-Tiered System of Supports 2. Identification Practices 3. IEP Development 4. Inclusive Practices: Planning, Guidance, and Implementation 5. General Education Classroom Composition, Collaborative Teaching, and Co-Teaching 6. Out of District Placements
Leadership Supporting students with disabilities (including increased collaboration and ownership of school administrators and staff) and coordinating to enhance relationships	7. Continued Inclusive Education Vision and Planning 8. Cross-Departmental Collaboration 9. Special Education Leadership Presence in Schools
Human Capital Investing in people from recruitment to retirement to ensure highly qualified and effective staff have the skills/training needed to provide services and support to promote the success of diverse learners	10. Professional Development
Systems and Structures Defining expectations for service delivery, resource allocation, and data management infrastructure to guide data-driven decisions	11. Special Education Policy and Procedure Manual 12. Record Keeping 13. Assistive Technology 14. Budget

Family and Community Engagements Embracing partnerships to make informed decisions and provide equitable opportunities for all students	15. Enact Report Recommendations 16. Website 17. Parent Trainings Awareness 18. Family Engagement Vision

Learning Environment and Specialized Services

1. Multi-Tiered System of Supports

- **MTSS framework.** Build on CCSD's current RTI and processes to develop a unified and clear structure of MTSS for academic achievement, positive behavior, and social/emotional growth for all students. Create guides to explain how the intervention models, such as RTI, PBIS, etc., complement each other. Move from an RtI Model to an MTSS Framework, including both academic as well as behavior needs in the three-tiered triangle.

- **Districtwide leadership team.** Develop an MTSS cross-departmental district-level leadership team, including senior leadership, school principals, and representatives from every educational unit (e.g., special education, curriculum, and instruction, building leadership). Schedule meetings at least monthly to review, update, operationalize, and monitor the fidelity of MTSS implementation. Establish comparable school-based leadership teams to oversee MTSS implementation at each school.

- **Expectations.** Establish, communicate, support, and monitor clear expectations for MTSS, with clear lines of accountability and responsibility across departments and schools, aligning them with relevant standards and guidelines.

- **Guard rails.** Determine what expectations will be required district-wide and which will be a school-based decision. Incorporate the expectations into administrator, principal, teacher, paraprofessional, and related-service personnel evaluations.

- **Consistent school-based MTSS teams.** Require all schools to consistently operate a school-based MTSS team to support problem-solving, data-based decision making at all tiers to support academic advancement and positive behavior, and consistency between schools. Ensure principals schedule time for teams to implement the problem-solving process, meet and review progress monitoring and intervention data, be empowered, and be held accountable for adjusting school schedules to provide the necessary supports for all struggling students.

- **Written guidance.** Create an electronic user-friendly, and accessible MTSS manual for school teams and for parents to understand the MTSS process and to document procedures/practices relevant to the management/operation of MTSS in CCSD. Include protocol for collecting progress monitoring data and assessing student growth; what constitutes adequate progress and associated lengths of time to allow for progress, and requirements for initiating a special education evaluation when such progress is not shown. Ensure a common understanding and buy-in around the district for the need for MTSS, why and how it is implemented, what desired targets it is intended to meet, and what progress CCSD is making toward achieving the goals. Maintain the manual by updating it regularly as there are changes to policy or practice.

- **Electronic dashboard**. Develop a transparent and widely accessible district-wide early warning dashboard to monitor student intervention data use and growth for academics and behavior to enable leadership at the central office and schools to review MTSS implementation and student growth, identify patterns, solve problems, and make data-informed decisions.

Review and expand upon rubrics currently in use to have a universal set of documents that are relevant based on grade levels and types of schools.

- **Professional development**. Provide MTSS professional development for all school-based staff. Have central office staff develop turn around trainings for school-level staff, so a unified voice is heard throughout the district.

- **Academic Intervention Services (AIS)**. Start Academic Services earlier in the year. Address concerns around quality of services. Schedule services so they occur during the school day. Determine whether a student with an IEP needs AIS or additional supplemental support via pull-out in a resource room setting. Clearly define AIS as a Tier 2 Intervention if that is how it is being leveraged. If student with IEP needs more intensive services than AIS, consider other supplementary instruction to support students.

- **Behavioral Supports**. Ensure students have access to behaviorists when it is determined appropriate (e.g. Board Certified Behavior Analyst). For students with Autism and/or complex disabilities, a behaviorist can play a critical role in conducting a Functional Behavior Assessment, creating a Behavioral Intervention Plan, and providing targeted, individualized behavioral protocols for students (e.g. Applied Behavior Analysis; Token Economies; Reinforcement Plans when appropriate).

2. Identification Practices

- **CPSE Exits.** Ensure formal written protocols and a consistent understanding among teachers and administrators around the process, in regulation, of declassifying preschool students prior to becoming school-age (kindergarten).

- **Monitoring.** Based on the areas of practice identified through the above activities, identify data to be collected and monitored, along with any practices to be monitored, to support consistent implementation across CCSD and to identify schools needing additional support or intervention. Monitor disability categories by race to ensure there are not patterns of over/under identification by race or disability category, especially in the disability classifications of Emotional Disability (ED) or Multiple Disabilities (MD).

3. IEP Development

- **Written procedures.** Include in CCSD's written special education guidance standards and examples for IEP development processes that are appropriate and consistent across the district. Guidance would include but not be limited to Present Levels of Educational Performance (PLEP) and data use within; student needs; IEP goals; and progress reporting. Include a procedure for discussing additional material and human resources than those currently available to meet a particular student's needs, including those needed for students who would otherwise be placed out of district.

- **Monitoring IEPs.** Establish and implement a process for periodically reviewing student IEPs for their consistency with expected standards. Consider using a school-based process, which would include an impartial CCSD facilitator to review, analyze and discuss IEPs with teachers and related service providers.

- **Collaboration.** Foster positive CSE collaboration by creating more planning time between general education and special education teachers; ensuring adequate time and coverage for staff participating in CSE meetings; and transparent processes around timelines, data, and information sharing with parents to enhance trust and partnership among all CSE members.

4. Inclusive Practices: Planning, Guidance, and Implementation

- **Review district's "full inclusion" definition and ensure that all staff understand its meaning.** Ensure that educators do not see "full inclusion" as mainstreaming and/or integration into the general education classes, as indicated in the staff survey. Set an orientation as meeting the unique learning needs of students and providing them adequate supports**.** Ensure this definition includes the appropriate supports needed for students with complex disabilities; ensure that it does not preclude them from services and supports needed for them to succeed or create official and/or unofficial time-limits for the receipt of special education services (e.g. 2 hour cap for CT when student may need more as part of his/her program).

- **Implementation guide.** Develop a clearly articulated district/school implementation guide based on the inclusive education framework with expected guidance, procedures and practices. Determine the role of schools to adapt the framework to their unique needs versus CCSD requirements. This process could also include CCSD's advance approval for a school to adapt the framework with deviations CCSD defines as significant.

- **Scheduled time for collaboration.** Establish written guidance for the use of inclusive master school schedules, which establish common planning time for collaborative teaching, co-teaching, and other activities for general educators with special education and other personnel. Develop various scheduling models that schools could use and/or adapt.

- **Master Schedules.** Ensure master schedules are not limiting students from receiving special education services. In particular, at the middle school, ensure that schedule is not pulling students from the arts, band, or foreign language to receive special education services.

5. General Education Classroom Composition, Collaborative Teaching, Co-Teaching, and Learning Centers

- **Collaborative Teaching.** Draft guidance for collaborative and consultative teaching to support students with disabilities that are consistent with best practices and meeting mandates in New York Regulations. Ensure that students are not limited to receiving a 2-hour maximum of service when in fact their IEP team agrees that additional services are required to meet their needs, Ensure that middle school schedules aren't dictating the quantity of CT services.

- **Inclusive Co-taught instruction.** Draft guidance for the delivery of co-taught instruction based on the most effective model for instruction purposes and use of the special educator in addition to meeting mandates in New York Regulations.[7] Based on the developed guidance, provide intensive professional development and follow-up coaching and modeling to give co-teachers the information and support they need to be true partners in the planning and delivery of classroom instruction.

- **Professional development.** Provide professional development on collaborative teaching, co-teach to ensure teachers engage in a true instructional partnership. Provide planning time for general education and special educators and others to become true collaborative partners.

- **Learning Centers (Resource Rooms).** Provide resource rooms at elementary schools for students who may require pull-out services or supplemental services in an environment that meets their needs and their IEPs.

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[7] See Marilyn Friend's website, *The Co-Teaching Connection* for information about six models of co-teaching, retrieved from http://www.marilynfriend.com/approaches.htm, as well her home page with additional resources, retrieved from https://coteach.com/.

6. Out of District Placements

- **Parent outreach**. Talk with parents and CSE teams who sought or obtained an out of district placement to better understand their motivations and CCSD program gaps.

- **School assessment**. Visit or obtain other information about the most common out of district placements to ascertain how these resources are different from any currently available for any student in CCSD schools. Place special emphasis on students at middle school levels – specifically focusing on how programming offered at out of district placements within neighboring school districts can be replicated in CCSD.

Leadership

7. Inclusive Education Vision and Planning

- **Renewed guiding vision and mission of "Full Inclusion".** Clearly articulate "full inclusion" in a manner that all can understand the vision and mission – from leadership to educators. Ensure educators do not mistaken mainstreaming or integration as inclusion.

- **Clear expectations.** Either in the renewed vision/mission or other documentation, communicate to schools, parents, and the broader community that CCSD expects and will take steps to ensure (1) students with disabilities make the greatest amount of progress possible in the general education curriculum (or modified curriculum per IEPs) through rigorous and high quality standards-aligned instruction, and specially designed instruction and interventions, along with differentiated instruction, accommodations, and modifications; (2) inclusion is not merely mainstreaming or integrating; (3) inclusion can still be achieved when students, especially students with complex disabilities, receive additional specialized services and supports outside the general education classroom; and (4) partnerships with families are critical for trusting and collaborative partnerships.

- **Strategic plan.** Develop a long-range strategic plan based on the above recommendations as well as other relevant information.

8. Cross-Departmental Collaboration

- **Increase Collaboration with Office of Curriculum and Instruction.** Establish a schedule for routine, collaborative meetings between the Office of Curriculum and Instruction, the Special Education Office, and the Office of Pupil Personnel Services to ensure that special education and curriculum are functioning in lock-step.

- **Collaboration between Office of Special Education and Office of Diversity, Equity, and Wellness.** Collaborate on matters such as the identification of racial minorities with disabilities to ensure students are not being overidentified. Ensure the inclusion of students with disabilities is not being excluded from the "inclusion" definition within the Office of Diversity, Equity, and Wellness.

- **Collaborative work.** Use these collaborative partnerships to establish consistent and integrative approaches to support improved instruction for various purposes by creating cross-functional workgroups.

- **Key performance indicators (KPIs).** Set goals for all cross-departmental initiatives and establish KPIs with targets to measure the extent to which they are beneficial or require modification.

9. Special Education Leadership Presence in Schools

- **Administrator Visibility in schools**. Ensure Special Education Director and Assistant Superintendent for Pupil Personnel Services are known faces in buildings; establish opportunities for staff within buildings to meet/collaborate.

Human Capital

10. Professional Development

- **Special Education Planning.** Include special education in the district's existing professional development planning. Ensure that supporting the needs of students with IEPs, IEP writing, and other essential components of special education are part of CCSD's mentoring process. Include professional development opportunities that address complex disabilities.

Systems and Structures

11. Special Education Policy and Procedure Manual

- **Standard Operating Procedures Manual**. As stated earlier, create an interactive, web-based CCSD special education manual to support user-friendly and transparent access to procedures/practices relevant to the management and operations of special education and to which school staff can be held accountable for implementing. Streamline resources so that school teams can easily access relevant information and use embedded hyperlinks to provide information for staff as needed. Update the manual on a routine basis. Include criteria, procedures, and practices for each area in the manual relevant to the implementation of these recommendations, e.g., criteria for child find; MTSS progress criteria to support the referral of students for special education evaluations; inclusive instruction; revised continuum of services; transportation protocol; etc. Make this an internal and external facing document.

- **Assistive Technology**. Ensure that students with devices, especially speech generating devices, have access to Assistive Technology Professionals in addition to the supporting Speech and Language Pathologist, to provide staff training, student training, parent training, and ensure ongoing functionality within the child's Special Education program.

- **Budget**. Engage in a special education budgeting process that allows for a building-by-building breakdown of special education expenditures.

12. Record Keeping

- **IEP Accuracy.** To build community trust, implement the recommendations in this report and publicly report at least twice per year on progress made or obstacles/delays encountered.
- **Board Mandates.** Ensure board has the required documentation on the provision of services for children with IEPs in the form of a list; instead of providing redacted IEPs. Within its capacity to arrange for the appropriate special education programs and services to be provided to a student with a disability as recommended by the committee on special education, the district can provide a list that includes the following information instead of redacted IEPs: a brief summary that includes recommendations and service details that warrant or incur a cost to the district; however, the student ID or other personally identifiable information cannot be listed.

Family and Community Engagement

13. Enact Report Recommendations

- **Implement and publicly report recommendation progress.** In order to build community trust, implement the recommendations in this report and publicly report at least twice per year on progress made or obstacles/delays encountered. Ensure this information is shared with key stakeholders including the Special Education PTA.

14. Website

- **Content.** At least annually, review and update materials posted on the CCSD website regarding special education process (CSE and CPSE), instructional models, related services, and supplementary aids and services. Ensure this information is clearly accessible and comprehensive and accessible to parents with diverse linguistic needs and sensory limitations.

15. Family Engagement Vision

- **Collaborative vision.** With representatives of parent support groups as well as other CCSD diverse representatives, have discussions about family engagement, specific to special education. Based on these discussions, create a core belief vision statement of agreed-upon ideals. Share it with other stakeholders to build family engagement support across the District.

- **Parent Training Engagement and Communication.** In consultation with representatives of parent support groups, develop a training plan for families in the areas of IEP process, role of the child study team, helpful hints for parents at home, and how families can take an active and collaborative role at IEP meetings. Ensure a communications plan exists to ensure the widest possible audience.

III. DISTRICT CONTEXT AND DEMOGRAPHICS

District Context

The Chappaqua Central School District (CCSD) is located in Chappaqua, New York and includes all of the hamlets of Chappaqua and Millwood, and parts of Armonk, Briarcliff Manor, Mount Kisco, Ossining, and Pleasantville, New York. The district is located 35 miles from New York City. CCSD describes itself as "…a nationally renowned, public school system characterized by highly motivated students, a broadly educated and talented staff, and an actively involved parent community."[8] The population is approximately 18,000 residents, many of whom commute to New York City or one of the surrounding business centers in the Tri-State Area.[9]

District Mission Statement

The CCSD mission statement is the following:

> *The mission of the **Chappaqua Central School District** is to create a community for learning, where students, parents and staff are joined in the pursuit of academic excellence and personal growth in a caring environment. We seek to develop each student's full potential through a challenging curriculum, a diversified faculty, and a commitment to intellectual freedom. We will teach basic skills, foster creative and critical thinking, and provide a foundation for life-long learning. We will nourish our students' emotional lives and guide their social development, instilling in them an appreciation of self-worth, of individual difference, and of global interdependence. We will help them learn how to manage freedom and to act ethically so that each may become a responsible, contributing member of society.*

Specific to special education, the CCSD special education department has provided the following statement on its inclusive practices on its website:

An Inclusive Framework for Education
The Chappaqua School District is committed to providing equitable opportunities for students with disabilities to receive effective educational services, with the needed supplementary aids and support services, in age-appropriate general education classrooms in their neighborhood schools.

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[8] https://www.chappaquaschools.org/district
[9] https://drive.google.com/file/d/19TSaRIH4cQ8Wfn4x2JR9pP_ScUjHyTIL/view

To the greatest extent possible, students with disabilities are educated in chronologically age-appropriate general education classes in their home schools and provided with the specialized instruction they require. Within our inclusive model, instruction is developed and provided in a manner that ensures all students have access to the same curriculum within a learning experience appropriate for them.

Everyone Benefits
Inclusive education significantly contributes to the educational experience of all children in many ways. Special educators, educational specialists, and other support personnel recommended for the education of integrated students with disabilities enrich classrooms by working with all students. The instructional teams in schools are expanded by the participation of multidisciplinary personnel made available by special education and enable new teaching and learning experiences in classrooms for all students. Inclusive education enriches the diversity in classroom learning communities providing all students expanded opportunities for better understanding the world, those around them, and themselves.

Over the many years the school district has developed and implemented inclusive practices, academic outcomes for students with disabilities have become stronger. During the same period of time, the overall achievement of students throughout the district has consistently been excellent.

CCSD has three elementary schools two middle schools, and one high school: Douglas Graffin Elementary School (grades K-4); Roaring Brook Elementary School (grades K-4); Westorchard Elementary School (grades K-4); Robert E. Bell Middle School (grades 5-8); Seven Bridges Middle School (grades 5-8); and Horace Greeley High School (grades 9-12). As of the 2020-21 school year, the district's total student population, ages 6 to 21, is approximately 3577.[10]

Horace Greeley High School

According to the school district, Horace Greeley High School (HGHS) has approximately 1,200 enrolled students and 150 faculty and staff members. HGHS has a reputation built on student achievement. In 2020-2021, 21 AP courses were offered; 452 students took 1041 exams. The Class of 2021 had 29 National Merit commended students, 20 semi-finalists, 19 finalists, and 3 National Merit recipients.
The Class of 2021 is no exception to HGHS' commendably typical college matriculation – 98 percent of that class went onto higher education. Furthermore, the high school is proud of its Ivy League college enrollment; 16 percent of the Class of 2020 (55 out of 345) matriculated into an Ivy League college. In a typical school year, HGHS' graduating class are admitted and enrolled in all eight of the Ivy League schools.

HGHS' students with IEPs graduate with a diploma at high rates. Another exceptional attribute about HGHS is its higher education matriculation rate for its students with IEPs.

Robert E. Bell Middle School and Seven Bridges Middle School

Robert E. Bell Middle School has 625 students and the Seven Bridges Middle School has 587 students.[11] CCSD's two middle schools are also highly regarded. Both middle schools are consistently ranked among the top 45 in the country and among the top 20 in New York by Niche.com.[12]

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[10] https://data.nysed.gov/profile.php?instid=800000035177
[11] https://data.nysed.gov/profile.php?instid=800000057175
[12] https://www.niche.com/k12/d/chappaqua-central-school-district-ny/

Douglas Grafflin Elementary School, Roaring Brook Elementary School, and Westorchard Elementary Schools

CCSD has three elementary schools that serve students grades K-4. Each of these schools have notable foci on Science, Technology, Engineering, Arts, and Mathematics.

Community Pride

In all of the schools throughout the district, PCG consultants observed a remarkable sense of community among staff, building leadership, and the students they serve. Principals and teachers knew students throughout their buildings by name, could speak about the child's siblings, their families, and their commitment to the school community. The majority of the District's administrators could be seen throughout their buildings supporting students and staff in a highly visible manner.   This attribute is highly commendable.

Overview of CCSD's Special Education Demographics

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

OSEP has been criticized in past years that the analysis of the special education SPP indicators focused on compliance with no regard to performance outcomes. As a result, in 2013 the Department announced its intention to change this practice and to include participation in statewide assessments, reading and math proficiency results on the National Assessment of Educational Progress (NAEP), and graduation and dropout rates along with compliance results as the basis of the new RDA structure. The intent of RDA is to strike a balance between the focus on improved results and functional outcomes for students with disabilities while still adhering to the compliance requirements of IDEA. RDA is designed to be transparent and understandable and to drive improvement in the academic and functional achievement of students with IEPs.

IDEA Part B Indicators

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

The SPP indicator data collected takes on additional importance with OSEP's move to the RDA framework, as there are points associated with both a "Part B Compliance Matrix" and a "Part B Results Driven Accountability Matrix."

The following are compliance indicators and have a 100 percent minimum target:

Indicator 4b. Severely discrepant out-of-school suspensions by race/ethnicity but associated with compliant IDEA practices

Indicator 9. Disproportionate of all students with IEPs based on race/ethnicity but associated with compliant IDEA practices

Indicator 10. Disproportionate representation of students based on race/ethnicity by six disability categories but associated with compliant IDEA practices

Indicator 11. Timely initial eligibility evaluations

Indicator 12. Timely Part C (students from birth to 2 years) to Part B (students 3 to 21 years of age) transition

Indicator 13. Secondary transition goals and services documented in IEPs

States are required to include the SPP performance indicators below in their RDA framework. In addition, states may choose to include other performance indicators as part of their state accountability framework. Each state's framework must include and establish a target for each of the following SPP areas:

> **Indicator 1.** Graduation rate

> **Indicator 2.** Dropout rate

> **Indicator 3.** Statewide assessment participation rate

For the 2018-19 school year, CCSD met all SPP targets but the following: Indicator 3; Grade 3-8 ELA Participation Rate (CCSD 82 percent/ State Target 95 percent); Indicator 3, and Grade 3-8 Math Participation Rate (CCSD 81 percent/ State Target 95 percent)

Additional SPP data for CCSD is integrated into other sections of this report. The section below details the demographics of students with IEPs in CCSD.[13]

Overall Incidence Rates

In CCSD, according to the New York State Education Department, Chappaqua's classification rate of students receiving special education services has been the following: 2017-18, 10.1 percent; 2018-19, 9.6

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[13] Some exhibits are labeled K-12 and others are ages 6-21. This is due to how the data are presented in other publicly available sources, such as national data.

percent, and 2019-20, 9.4 percent. During these school years, the rates trended below state averages. According to data submitted by CCSD to PCG, 404 out of 3577 students ages 6-21 have IEPs, yielding a classification rate of 11.2 percent.

Looking at 2018-19 data CCSD has the 52nd lowest special education classification rate in New York State.[14] Excluding districts with special education enrollment under 100, it has the 29th lowest classification rate in the state.[15]

Exhibit 1. 2018-19 Classification Rates in New York State – Districts with Over 100 Students with IEPs by Lowest Classification Rate[16]

Name	Total SWD	Total Students	Classification Rate
Chappaqua C S D	353	3597	9.81%
Cazenovia C S D	139	1419	9.8%
Amherst C S D	420	4303	9.76%
Rye Neck U F S D	152	1558	9.76%
Greenburgh C S D	291	2989	9.74%
Taconic Hills Central School District	149	1540	9.68%
Sweet Home C.S.D.	364	3770	9.66%
Roslyn U F S D	306	3199	9.57%
Webster C S D	837	8802	9.51%
Dobbs Ferry U F S D	210	2210	9.5%
Uniondale UFSD	1010	10629	9.5%
Jericho U F S D	333	3580	9.3%
Pawling C S D	143	1542	9.27%
UFSD of the Tarrytowns	334	3645	9.16%
Valley Stream-Hempstead 24 School	123	1353	9.09%
Valley Stream Hemp# 30 School	136	1506	9.03%
Rhinebeck C S D	117	1299	9.01%
Monroe-Woodbury C S D	1207	13484	8.95
Fayetteville-Manlius C S D	404	4525	8.93%

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[14] http://www.p12.nysed.gov/sedcar/state.htm. Note, this school age classification rate differs from what is listed within the Chappaqua CSD Special Education School District Data Profile for 2019-20, https://data.nysed.gov/specialed/?year=2020&instid=800000035177

[15] By including this information, PCG neither asserts the District's classification rate is too high or too low. However, these data are important indicators for the District to consider as it looks at its patterns of identifying students with a disability.

Syosset C.S.D.	644	7634	8.44%
Skaneateles C S D	111	1329	8.35%
Briarcliff Manor U F S D	103	1309	7.87%
Penfield C S D	461	6012	7.67%
Rye City S D	325	4350	7.47%
Jamesville-Dewitt C S D	303	4061	7.46%
Mineola U F S D	367	5037	7.29%
Bronxville U F S D	127	2020	6.29%
East Ramapo C S D (Spring Valley)	2171	41868	5.19%
Kiryas Joel Village UFSD	311	9256	3.36%

Exhibit 2. CCSD Students with IEPs Compared to State Incidence Rates 2018-19 to 2020-21[17]
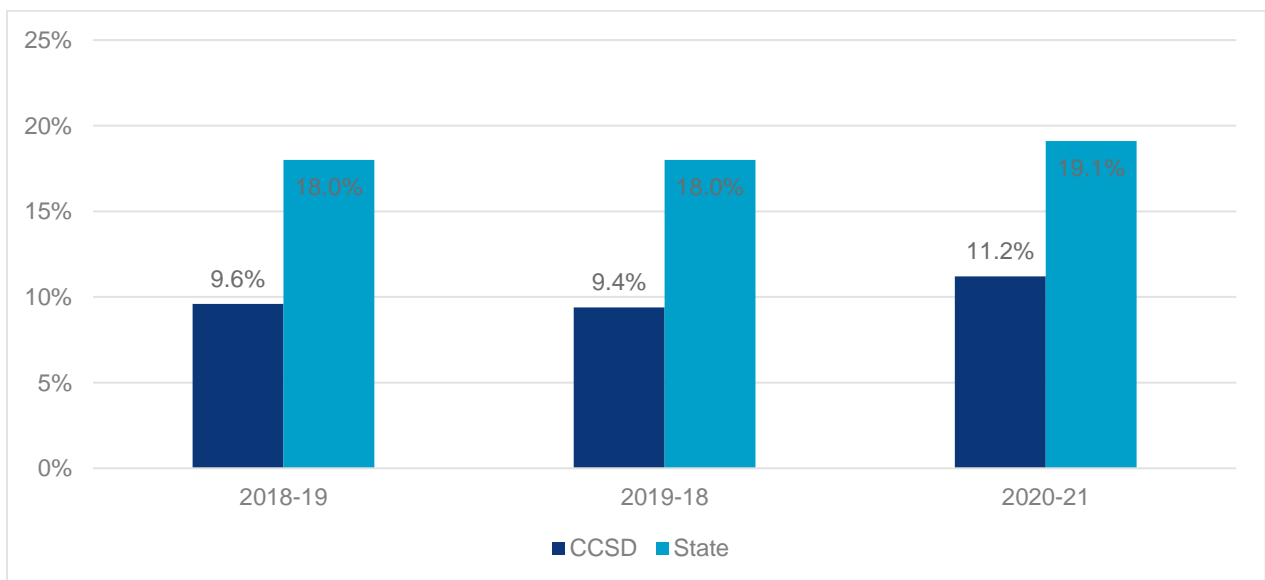
Compared to four similar districts in the Westchester County, CCSD's incidence rate of 9.2 percent was the second lowest. Blind Brook-Rye CSD had the lowest incidence rate (8.5 percent) of the comparable Westchester County districts and below the state classification rate. PCG selected these Westchester County Districts as peers given their proximity, similar socio economic status, yet nuanced differences in racial composition, classification rate, and percent of the day students with disabilities are in the general education setting.

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[17] 2020-21 CCSD classification rate derived from data provided by the district. At the time of this report's production, 2020-21 district classification rates were not publicly available on NYSED's website.

Exhibit 3. CCSD IEP Rates (K-12) Compared to Other New York School Districts and State, 2019-20[18]
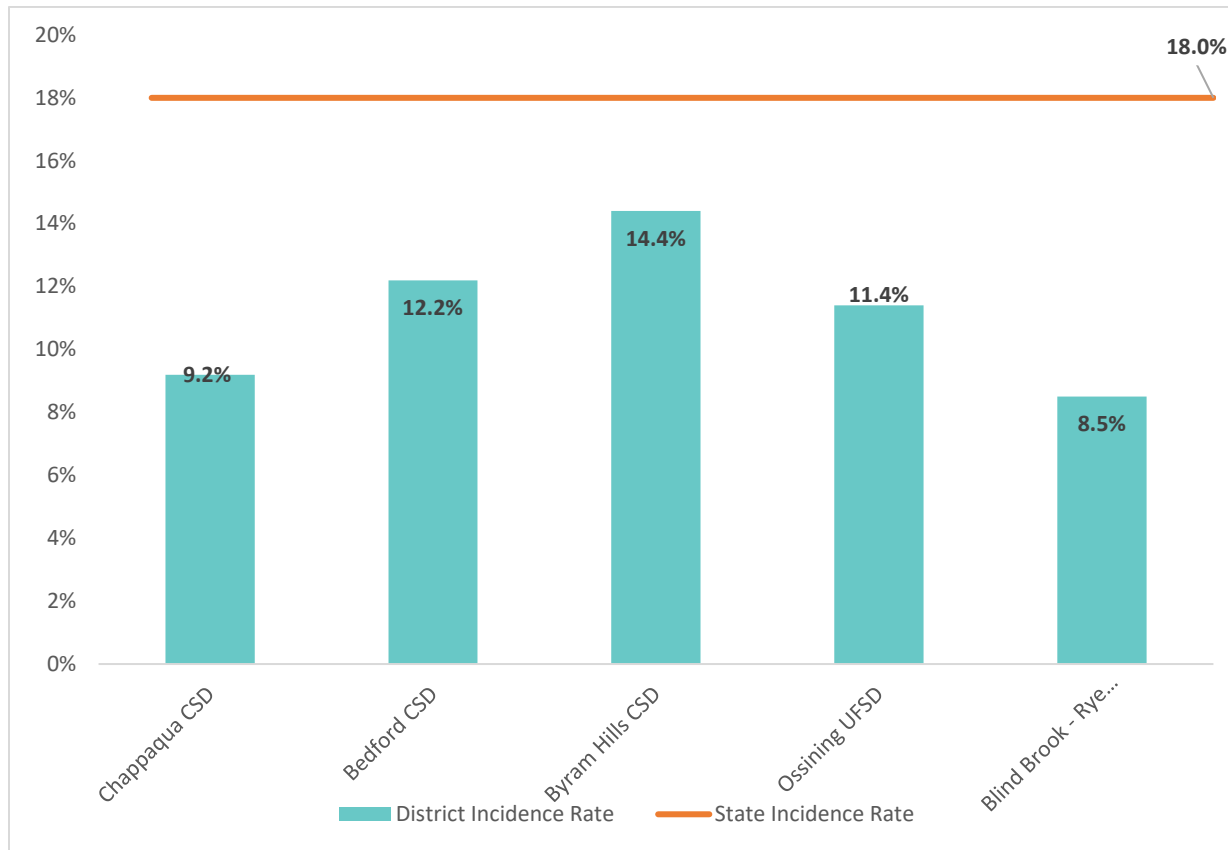
As detailed in the next exhibit, in October 2021, CCSD's incidence rate for students with autism (9.0 percent) was lower than the state (10.5 percent) and nation (10.3 percent). CCSD's identification rate for Other Health Impairment (30.0 percent) was notably higher than the state (17.1 percent) and nation (16.2 percent).

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[18] PCG used 2019-20 data because NYSED BEDS most recently available enrollment data is from that school year, looking at the Special Education Data pages within each school district.

Incidence Rates by Primary Disability Area

Exhibit 4. Percentage of CCSD Students with IEPs by Disability Area Compared to State and Nation (Ages 6-21), October 2021

	All disabilities	Autism	Emotional Disturbance	Intellectual Disabilitiy	Other Health Impairment	Learning Disability	Speech or Language Impairment
CCSD	11.3%	9.0%	1.0%	1.0%	30.0%	29.0%	17.0%
State	19.1%	10.5%	4.2%	2.5%	17.1%	32.6%	28.9%
Nation	13.4%	10.3%	5.6%	7.0%	16.2%	39.2%	17.1%
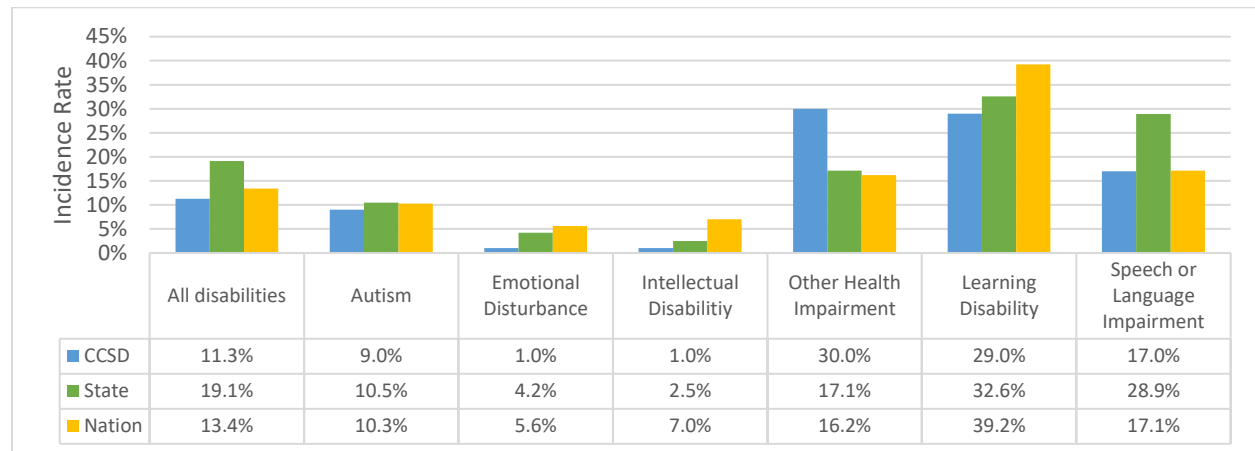
Incidence Rate by Race/Ethnicity

The following all students enrolled in CCSD, 79 percent were white, 10 percent were Hispanic, 6 percent were Asian; 3 percent were two or more races, and 2 percent were Black or African American.

Exhibit 5. Percent of CCSD Students with IEPs (K-12) By Race[19]
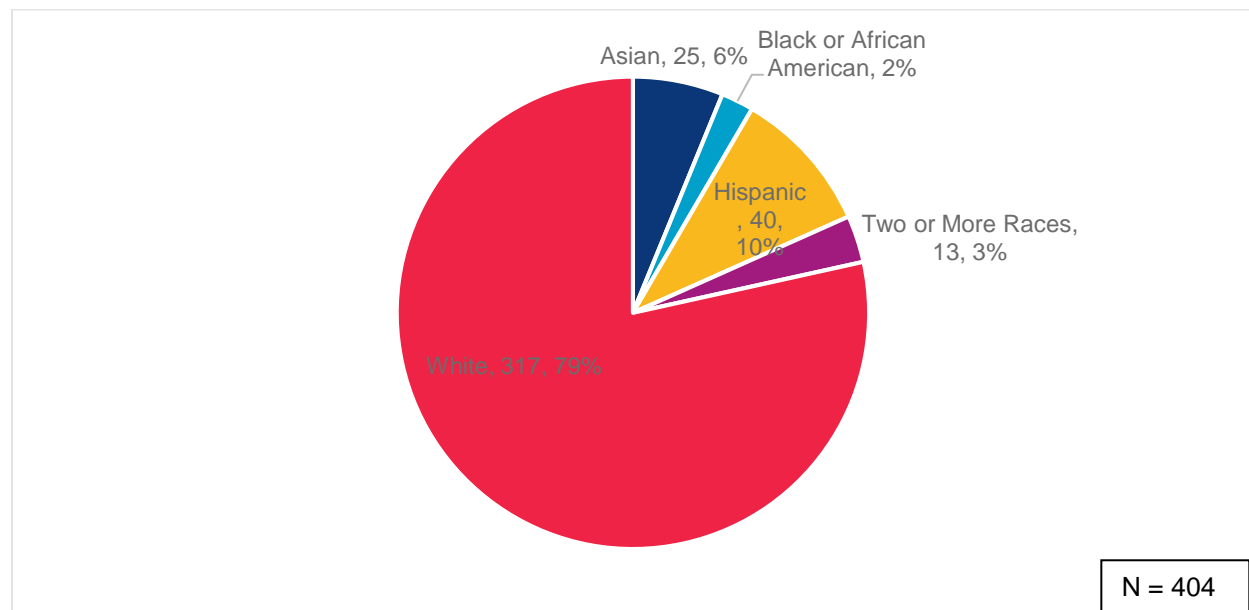
The next exhibit compares the percentage of students with and without IEPs within each race/ethnicity category.

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[19] Data for the following Race/Ethnicity categories were suppressed due to n<10: American Indian or Alaskan Native and Native Hawaiian or Pacific Islander

Exhibit 6. Percent of CCSD Students with and without IEPs (K-12) by Race/Ethnicity, 2021[20]
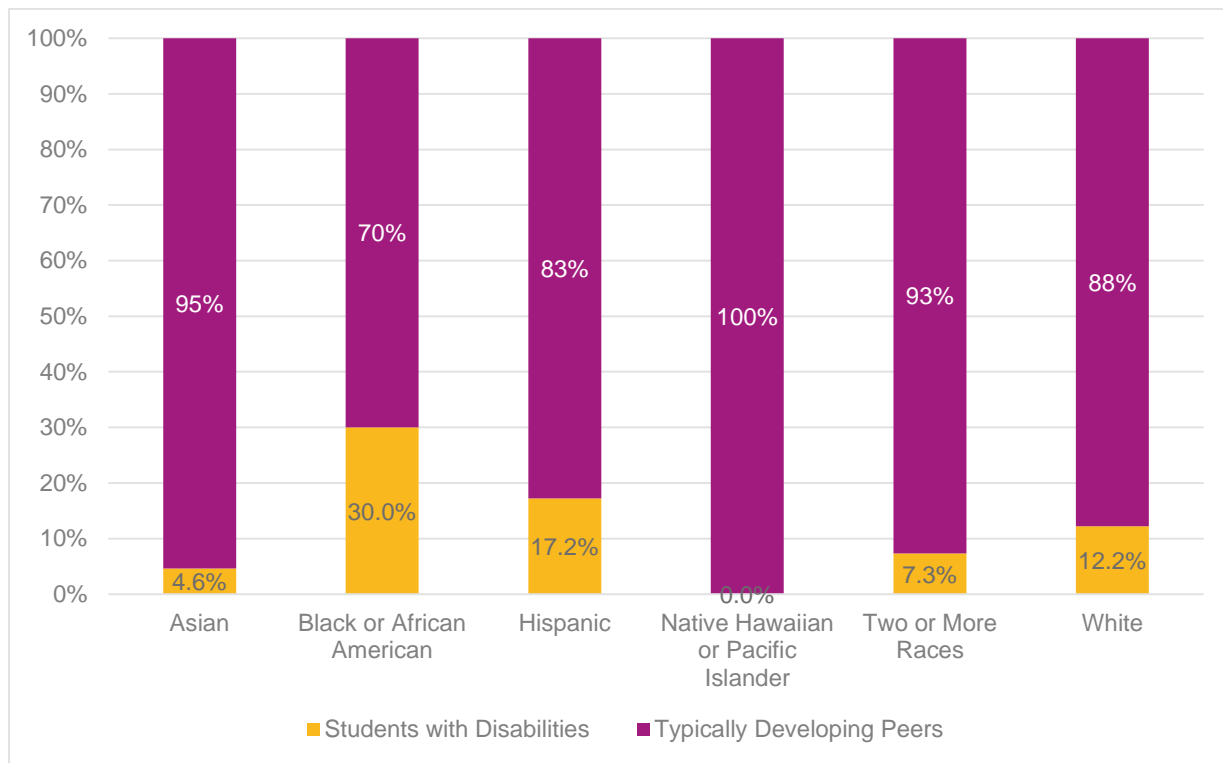
Race/ Ethnicity	Students with IEPs Ages 6-21	Students without IEPs Ages 6-21	Total number of Students
Asian	25	513	538
Black or African American	9	21	30
Hispanic	40	192	232
Native Hawaiian or Pacific Islander	0	*	*
Two or More Races	13	164	177
White	317	2278	2595
TOTAL	404	3173	3577

- Data by race/ethnicity showed that for several disability areas student percentages exceeded associated overall district rates. Key features, displayed in the graph below, include: White students accounted for 83.1 percent of students with Other Health Impairments; 81.4 percent of students with Speech or Language Impairments; and 79.4 percent of students with Learning Disabilities

- Hispanic students accounted for 53 percent of students with an Emotional Disability; 25 percent of students with Multiple Disabilities; and 10.8 percent of students with Other Health Impairments.

- Black and or African American Students for 16 percent of students with Multiple Disabilities; 3.2 percent of students with Learning Disabilities; and 2.6 percent of students with Autism.

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[20] id.

- Asian students accounted for 18.4 percent of students with Autism; 8.3 percent of students with Multiple Disabilities; and 6.7 percent of students with Emotional Disabilities.

Exhibit 7. CCSD Disability Classification by Race, 2021

	All Students	Autism	Emotional Disability	Multiple Disabilities	Other Health Impairments	Learning Disability	Speech or Language Impairments
White	2595	63.2%	26.7%	41.7%	83.1%	79.4%	81.4%
Two or more races	177	10.5%	13.3%	8.3%	3.1%	1.6%	1.4%
Native Hawaiian or Pacific Islander	5	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Hispanic	232	5.3%	53.3%	25.0%	10.8%	13.5%	8.6%
Black or African American	30	2.6%	0.0%	16.7%	1.5%	3.2%	0.0%
Asian	538	18.4%	6.7%	8.3%	1.5%	2.4%	8.6%

Race[21]	All Students	Autism	Emotional Disability	Multiple Disabilities	Other Health Impairments	Learning Disability	Speech or Language Impairments
Asian	538	7	*	*	*	*	6
Black or African American	30	*	0	*	*	^	0
Hispanic	232	*	8	*	14	17	6
Native Hawaiian or Pacific Islander	5	0	0	0	0	0	0
Two or more races	177	*	*	*	*	*	*
White	2595	24	*	5	108	100	57
Total	**3577**	**38**	**15**	**12**	**130**	**126**	**70**

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[21] N under 5 is redacted with *.

Incidence Rates by Gender

Overall, 65 percent of CCSD students with an IEP are male and 35 percent are female; in comparison to the district's total enrollment in which 52 percent are male and 48 percent are female. However, CCSD's incidence rates by gender mirror New York State as a whole, with 35 percent of student, statewide, are female and 65 percent are female. Notably, almost all students in CCSD classified with Other Health Impairments are female (95 percent); 80 percent of students classified with Autism are male; and 75 percent of students classified as Speech/Language Impairment are male.

Exhibit 8. Percent of CCSD Male vs. Female Students with IEPs (K-12)

141, 35%

263, 65%

■ Female ■ Male

N = 404
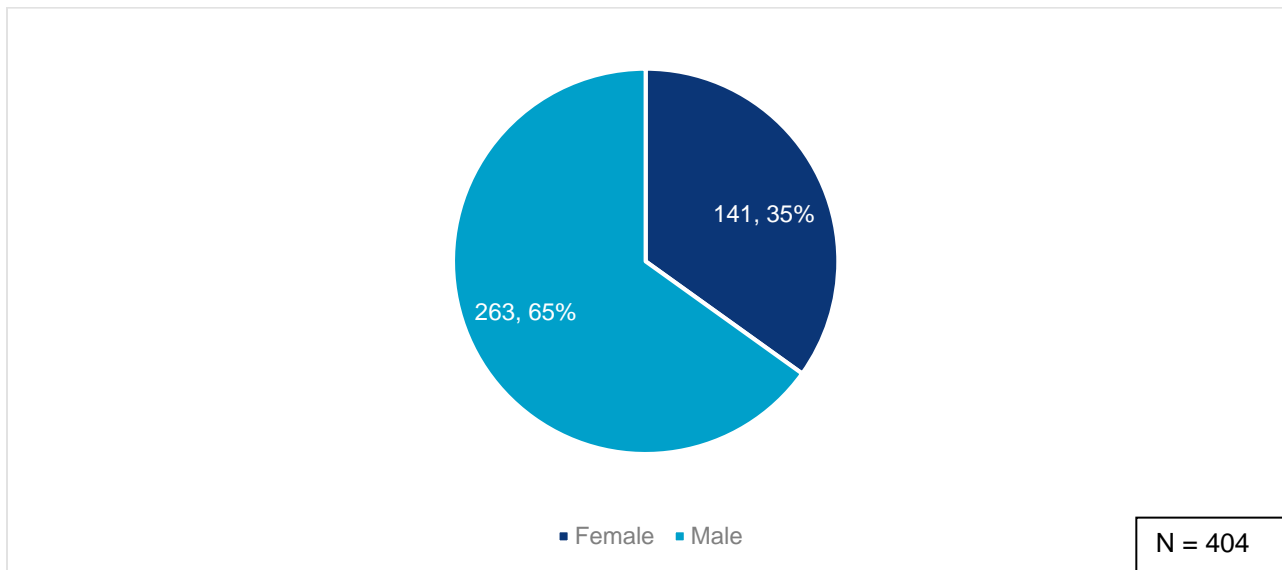
As shown in the next exhibit, males comprise more than half the following categories: Speech and Language, Autism, and Emotional Disturbance. Of note, females comprise the majority of students with IEPs who are classified as Other Health Impairment.

Exhibit 9. Percent of CCSD Male vs. Female Students with IEPs (K-12) by Disability, 2020-21[22]
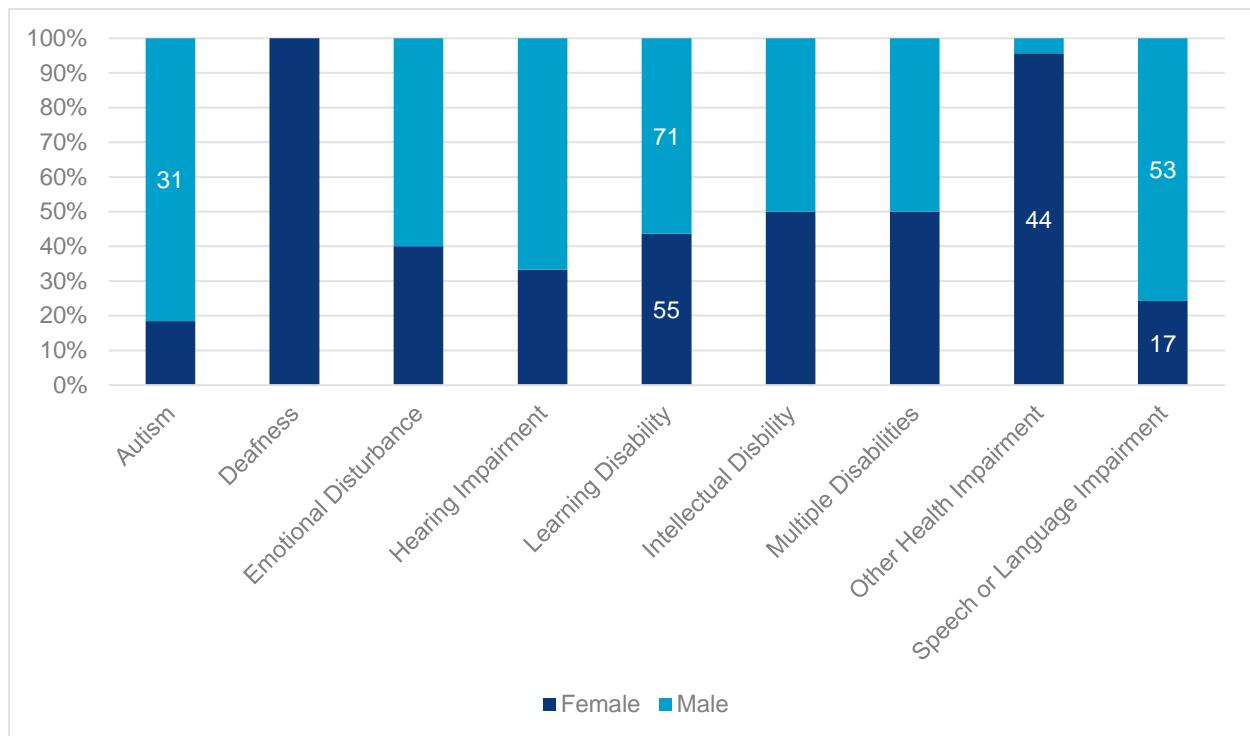
Incidence Rates by EL Status

In 2020-21, 1 percent of students in CCSD were English Learners. Of CCSD's 1 percent of student who are English Learners, 24 percent were students with IEPs. PCG is not including specific student counts on this because the number of EL students with IEPs is under 10.

Incidence Rates by Free or Reduced Lunch Status

Across the District, 5 percent of students are eligible for the Free or Reduced Lunch Program. Of all students eligible for the Free or Reduced Lunch Program in CCSD, 25 percent are students with IEPs.

Incidence Rates by Grade

The next exhibit displays the percent of CCSD students with IEPs based on each grade level enrollment. In the 2019-20, students with IEPs comprised 11percent of all enrolled students. The disability rate was lowest in the first grade (3 percent) and kindergarten (5 percent), and highest in grades 6, 11, and 8 (11 percent, 11 percent, and 9 percent, respectively).

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[22] Student counts under 5 are redacted.

Exhibit 10. Percent of Students (Grades K-12+) Receiving Special Education Services by Grade, 2019-20[23]
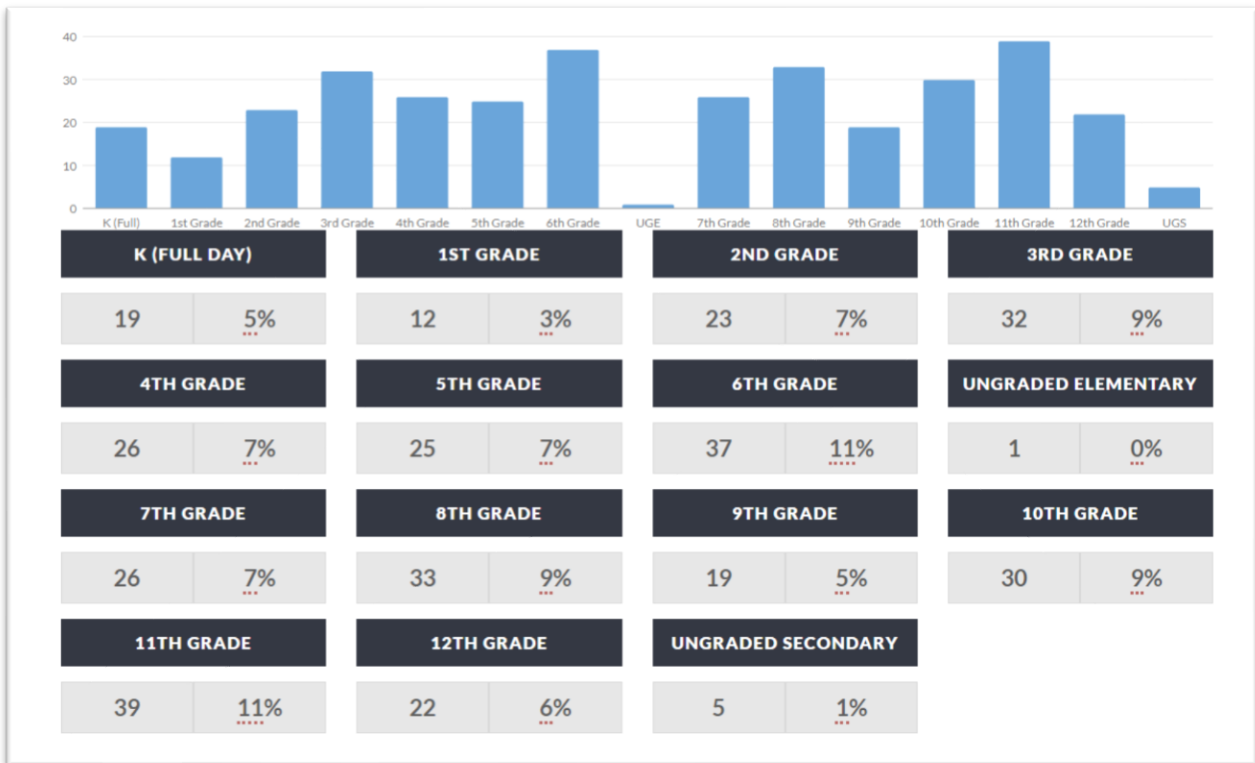
Early Childhood Education Demographics

Overall Incidence Rates

CCSD does not have an integrated preschool. Instead, its preschool students receiving special education or related services are serviced in private preschool or home settings. Of students ages 3-5, 39.4 percent have an IEP. In October 2021, 66 students had an IEP. Of that cohort, 29 students were male and 37 were female. The racial composition of CCSD preschool students with an IEP is notable. As seen in the next exhibit, 83 percent of the students are white; 9 percent are Asian; 6 percent are Hispanic; 2 percent are from two or more races; and no students are Black or African American.

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[23] 2019-20 Enrollment by Grade, NYSED Data Site,
https://data.nysed.gov/enrollment.php?instid=800000035177&year=2020&swd=1

Exhibit 11. Racial Composition of Students (Ages 3-5) with an IEP, 2020-21

Legend: ■ Asian ■ Hispanic ■ Multi ■ White

9% / 6% / 2% / 54, 83%

N = 66
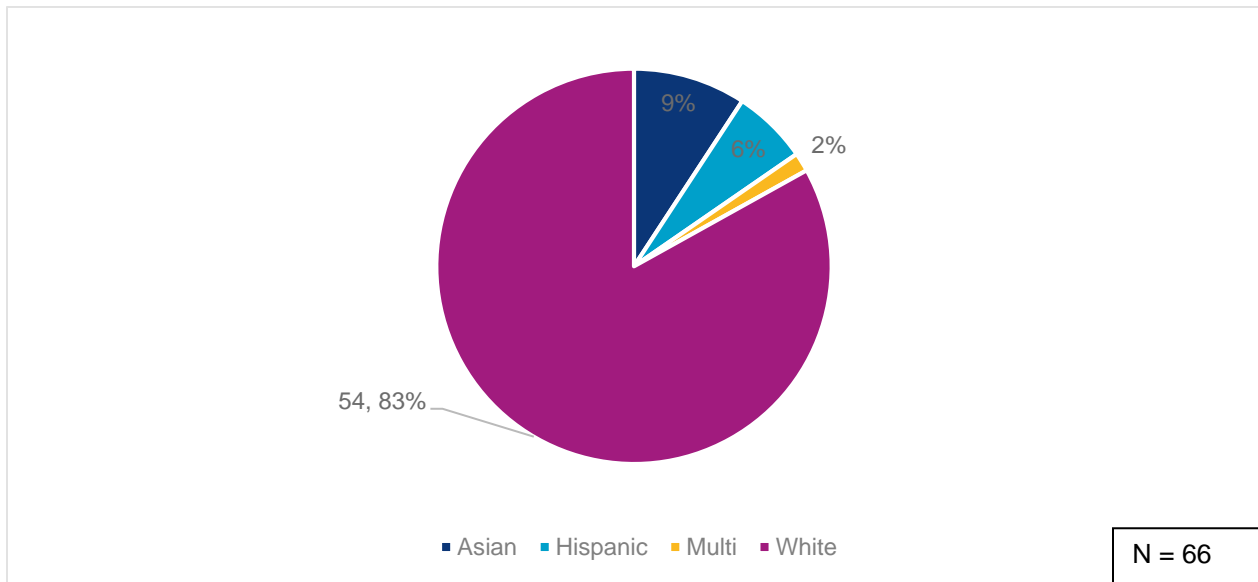
Summary and Implications

CCSD has a reputation for having high-quality schools and programs. Of significant note administrators, teachers, and staff PCG interacted with had a deep connection to the school community. Building leaders and teachers knew almost all students by name and could speak about their interests, their families, and the contributions their students make to their school community.

IV. SPECIAL EDUCATION SERVICES

Strengths	Opportunities for Improvement
• **Educator Commitment**. The District has committed educators (teachers, paraprofessionals, related service providers) dedicated to supporting students with IEPs. Many of the staff PCG consultants met shared their enthusiasm for working in CCSD. • **Deeply Engrained Belief in "Full Inclusion."** All staff PCG encountered have a belief that students with IEPs should be participating with their typically developing peers to the maximum extent. • **Out of District Placement Rates Consistent with Neighboring Peer Districts**. CCSD's placement rate is consistent with peers. • **Physical School and Classroom Environment**. The culture and climate of each of the Chappaqua schools visited were clean, secure, well-designed and appointed, and reflected a welcoming student friendly atmosphere. • **Universal Design for Learning (UDL)**. Although many teachers did not know it by name, several were engaged in core UDL concepts. • **Effective Integrated Co-teaching (ICT)**. In classrooms where ICT was being conducted, it appeared to be effective and well planned. • **Reading as a Related Service**. Teachers and parents pleased by the programming provided through this service. • **Drop Out Rate**. Exceptionally low dropout rate for students with IEPs. • **College Matriculation**. Exceptionally high rate of students with IEPs matriculating into college. • **Scores and Achievement Gaps on Standardized Assessments**. Students with disabilities as a cohort are improving in their overall scores (as proficient) and narrowing the achievement gap with general education students in Grade 3 Math and ELA; Grade 4 Math and ELA; Grade 5 ELA; Grade 7 ELA; and Grade 8 ELA. Proficiency decreased in the areas of Grade 5 Math; Grade 6 ELA and Math; Grade 7 Math and Grade 8 Math.	• **Multi-Tiered System of Supports**. There is inconsistent use of an MTSS or RtI framework to support struggling learners or special education referral data and conflicting beliefs on how the process can potentially support the needs of struggling students who may be identified in the future as students with disabilities. It is predominately found at the elementary schools; minimally followed in the middle schools; and is not followed at the high school. • **Outdated and Under-utilized RtI Handbook**. CCSD has an RtI handbook that is over a decade old and is inconsistently used and/or referenced. • **Academic Intervention Services (AIS)**. AIS reading and math occur later in the year and the district has challenges filling the roles. They are sometimes used as supplemental instruction for students with IEPs; however, AIS frequently occurs before the start of school. • **IEP/CSE Process**. The process lacks consistency across the District because staff feel messages and communication styles have changed with leadership changes in the Special Education Office, and the newly created Office of the Assistant Superintendent for Pupil Personnel. • **CPSE Exit Process**. There are no formal written protocols and an inconsistent understanding among teachers and administrators around the process of declassifying preschool students prior to becoming school-age (kindergarten). • **Inconsistent alignment in IEPs from Present Levels Statement to Needs and to Goals**. Staff inconsistently write Present Levels and Needs thus sometimes missing opportunities to create goals that address specific needs. It was also identified that the goals CSE teams frequently write are skill based while the instruction is content based, which sometimes creates an inherent mismatch between the instruction and the goals. • **Inconsistent Definition of "Full Inclusion."** Based on survey results, some educators see it as mainstreaming and/or integration into the

general education classes. Others see it as meeting the unique learning needs of students and providing them adequate supports

- **Limited Continuum of Services**. With an emphasis on maximizing the time spent in a general education classroom, some students with unique learning needs may not be getting access to learning supports and strategies that they need in order to be successful.

- **Continuum Challenges Impact Modifications**. There are intensive modifications required by some students that resulted in them being instructed often by paraprofessionals or special ed teachers separately in the classroom. This was also the result of insufficient time for students to receive learning center, resource support or the special ed teacher being in the class for a limited amount of time

- **Out of District Placements at the Middle School Years**. Challenges with the continuum may be driving out of district placement rates.

- **Consultant Teacher Model and Time Limits**. CSEs function under a limit of 2 hours of special education services.

- **Middle School Schedule Influences Services**. CSEs frequently feel restricted by schedule and make special education and related service decisions around schedule instead of student need.

- **Middle School Encore and Students with IEPs**. Middle school pull-out often occurs during the arts, music, and band; thus requiring students with IEPs to miss important courses essential to middle school students.

- **Learning Centers (Resource Rooms) Not Available at Elementary Schools**. Students who may require services in resource room settings do not have access in elementary schools.

- **Specialized Behavior Supports for Students with IEPs**. For some students with behavioral issues, there was no BIP prepared as they believed the program addressed behavioral issues. The district contracts out for some behavioral services but does not have any behavioral specialists available to teachers and teams.

- **Transition**. Transition goals frequently lack the use of quantitative data, no use of career inventories to inform transition goals at high

	school; students leveraging services such as vocational rehabilitation or Office of Persons with Developmental Disabilities (OPWDD) may have these items noted but not within the transition section of their IEP.
	• **Scores and achievement Gaps on Standardized Assessments**. scores decreased and gaps widened in the following areas: Grade 5 Math; Grade 6 ELA and Math; Grade 7 Math; Grade 8 ELA.

Child Find and Identification Practices

As required by IDEA and state regulations, each New York public school district is responsible for identifying, locating, and evaluating all children who may be eligible for special education services. This is known as "Child Find." Parents, teachers, or other school personnel may refer a child for evaluation to determine whether the child may be eligible for special education. If the CSE or CPSE suspects that a child may have a disability, school personnel will evaluate the child in all areas of the suspected disability. When the evaluation process is complete, the CSE will meet to review the results of the evaluation and determine whether the child is eligible for special education and related services.[24]

Before a referral is made for special education, schools may provide general education strategies and interventions to assess whether a struggling student needs additional supports or should be referred for special education evaluation. In CCSD, per its RtI Handbook created over a decade ago, schools are supposed to engage in Response to Intervention (RtI) protocols if a student is identified as struggling. RtI is a tiered system of supports, focused specifically on academic supports, that predates a Multi-Tiered System of Supports (MTSS) Framework.

Multi-Tiered System of Supports Framework

The provision of instruction/interventions and support to students within an MTSS framework improves educational outcomes for all students.[25] The framework focuses on prevention and the early identification of students who may benefit from instructional and behavioral interventions, as well as acceleration that removes barriers to learning.[26] When implemented as intended, MTSS leads to increased academic achievement by supporting rigorous core instruction and strategic/targeted interventions and improved student behavior. Furthermore, the framework can support reductions in otherwise disproportionate special education referrals of students based on race, gender, or EL subgroups. Prior to the development of the MTSS framework methodology, school districts typically employed a separate Response to Intervention (RTI) process to address poor achievement and Positive Behavior Intervention and Supports (PBIS) process to address poor behavior. These two processes merged into what is now nationally known as MTSS and is focused on the whole child.

Reflecting on the growing recognition of MTSS as a system-wide framework for supporting student achievement and positive behavior, the Every Student Succeeds Act (ESSA) includes MTSS as a permissible usage of Title I funds. ESSA defines MTSS as "a comprehensive continuum of evidence-based,

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[24] https://portal.ct.gov/-/media/SDE/Commissioner/specialed2.pdf?la=en

[25] See the Council of the Great City School's document, Common Core State Standards and Diverse Students: Using Multi- Tiered Systems of Support that outlines the key components of an integrated, multi-tiered system of instruction, interventions, and academic and behavioral supports needed by school districts in the implementation of the Common Core State Standards. The document is applicable also to school districts in states that have not adopted these standards.

[26] MTSS reflects the merger of response to instruction/intervention (RTI2), which typically focuses on academic achievement, and a system used to focus on improving positive behavior support.

systemic practices to support a rapid response to students' needs, with regular observation to facilitate data-based instructional decision-making."[27] MTSS provides an overall framework for structuring and coordinating the provision of core instruction along with additional behavioral supports, such as behavior modifications or mental health supports.

MTSS is centered on a tiered system of supports in which every student receives high-quality core instruction, known as Tier 1. Some students need supplemental instruction, which is referred to as Tier 2, and a small cohort of students receive the most intensive intervention and supports, known as Tier 3. Movement between these tiers should be fluid. A student with acute needs does not need to progress through the tiers to get individualized support, and a student who requires extra support should not miss the general instruction that is provided in Tier 1.

Under the MTSS framework, core instruction is evidence-based, rigorous, and of high quality. By utilizing a system based in the principles of Universal Design for Learning, learning differences are addressed proactively rather than reactively. The instruction is culturally relevant and linguistically appropriate and is implemented with integrity for all students. The MTSS framework is based on a presumption that some students require additional instruction to achieve grade-level standards. Increasingly intensive tiers of academic and social/emotional support are targeted to meet student needs based on data-based problem-solving and decision-making; instruction is adjusted to continually improve both student performance and the rate at which it progresses. Furthermore, the process is used to assess (using student responses to the instruction) the effectiveness of the tiered instruction/interventions being implemented. Many states have established intervention frameworks that align with the core tenets of the MTSS process and branded them accordingly.

District Practices

As defined in CCSD's RtI Handbook and according to focus group participants, CCSD refers to its three-tiered support system as RtI.

During 3 out of 6 central office interviews it was shared that the District's RtI process was inconsistent in its process and across schools. Some 6 out of 8 building administrator interviews it was also shared that the District's RtI process are inconsistent in its process and across schools.

A sampling of themes captured during interviews and focus groups is listed below:

- Administrators agreed that while RTI was in place at the elementary schools, there was inconsistent implementation at the middle school level.

- There was general agreement among district and middle school administrators that there was no RtI process that included dedicated interventions, data collection or progress monitoring.

- Administrators also expressed the that many teachers are not on board with the RtI process and that there is often not enough time to adequately discuss the student needs

- Principals expressed that RtI is not a district wide commitment but rather a building level decision as to process and use.

- Administrators and staff felt there was a need for training in RtI

- Administrators, staff, and parents expressed concern that Math support AIS, was only available before or after school and not as an integral school program.

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[27] Elementary and Secondary Education Act, as reauthorized in 2015.

- Parents expressed concerns that sometimes they were notified that their child was receiving RTI services, but they were not aware of any monitoring of improvement and the child continued to receive these services for months.

Staff were surveyed about attempts to provide support for students in general education prior to a special education referral. Approximately 29 percent strongly agreed and 48 percent agreed with the statement: "Before a student is referred for special education, every attempt is made to meet the student's needs through general education interventions."

Exhibit 12. Staff Survey: Before a student is referred for special education, every attempt is made to meet the student's needs through general education interventions.
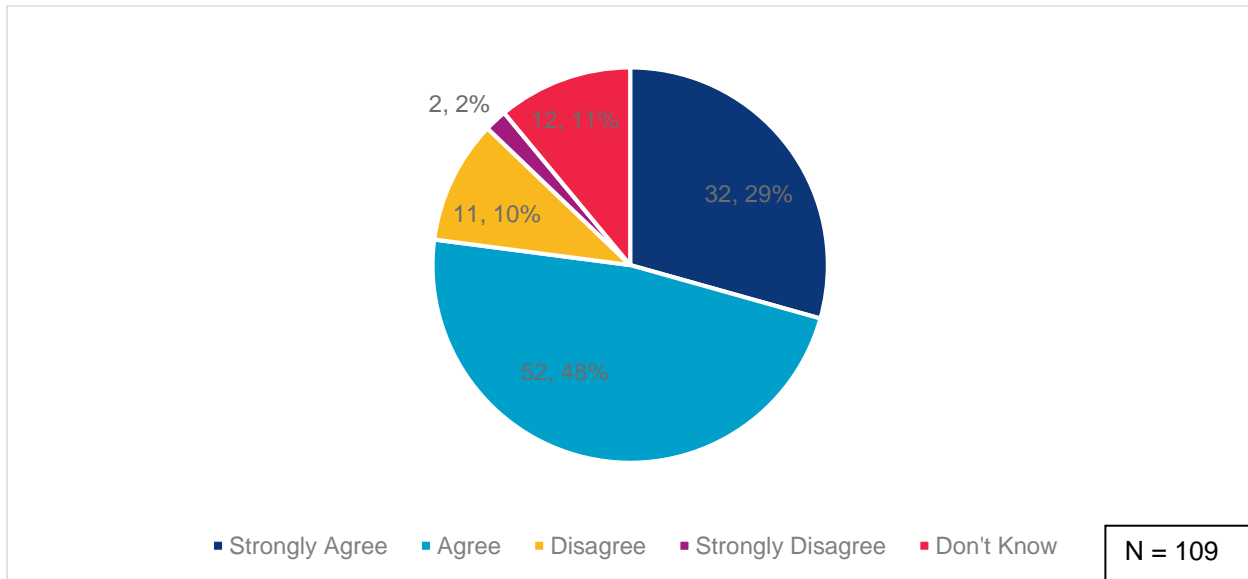
CCSD staff were asked if their school provides sufficient Tier 1 general education reading intervention support.[28] Approximately 16 percent strongly agree and 42 percent agree with the statement.

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[28] Tier 1 means all students receive high-quality, scientifically based instruction provided by qualified personnel.

Exhibit 13. Staff Survey: Our school provides sufficient Tier 1 general education reading intervention support.

Legend: Strongly Agree · Agree · Disagree · Strongly Disagree · Don't Know · N/A   N = 109

Pie chart values: 3, 3%; 17, 16%; 20, 18%; 3, 3%; 20, 18%; 46, 42%
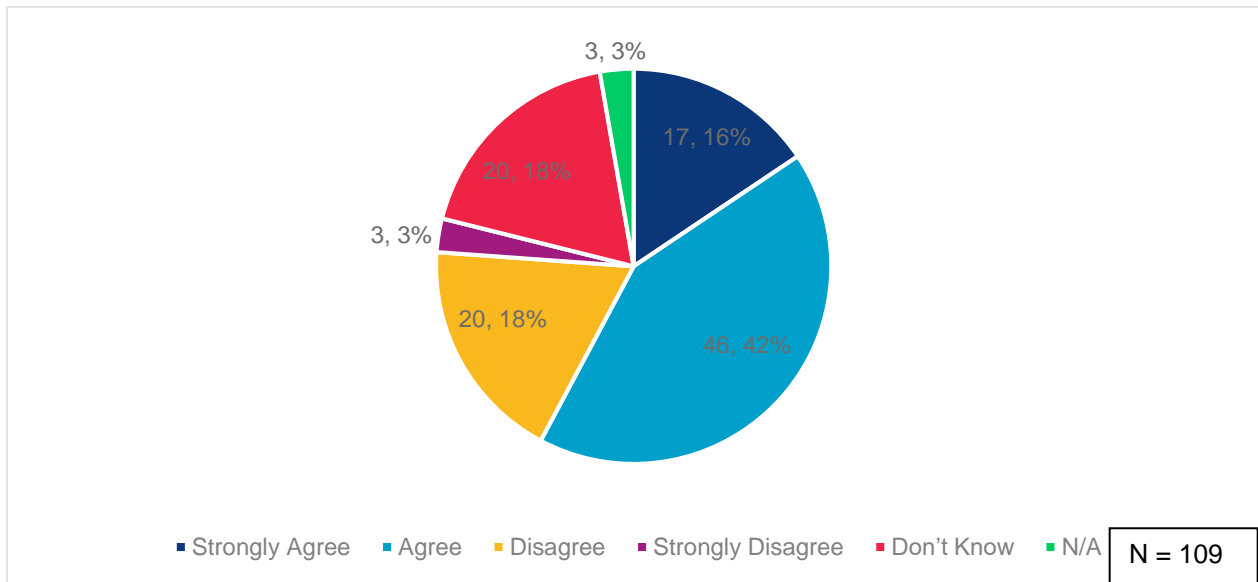
In the CCSD staff survey, staff were asked if their school provides sufficient Tier 1 general education math intervention support. Approximately 6 percent strongly agreed and 20 percent agreed.

Exhibit 14. Staff Survey: Our school provides sufficient Tier 1 general education math intervention support.

Legend: Strongly Agree · Agree · Disagree · Strongly Disagree · Don't Know · N/A   N = 109

Pie chart values: 6, 5%; 7, 6%; 22, 20%; 29, 27%; 18, 17%; 27, 25%
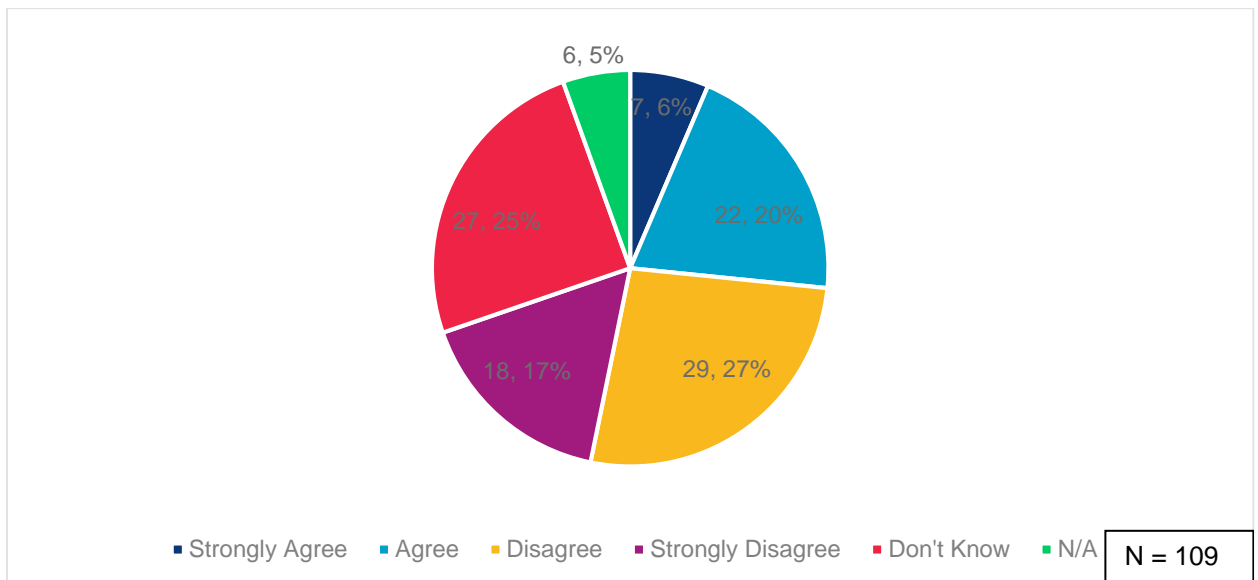
In the CCSD staff survey, staff were asked if their school provides sufficient Tier 1 general education behavior intervention support. Approximately 7 strongly agreed and 38 percent agreed.

Exhibit 15. Staff Survey: Our school provides sufficient Tier 1 general education behavior intervention support.
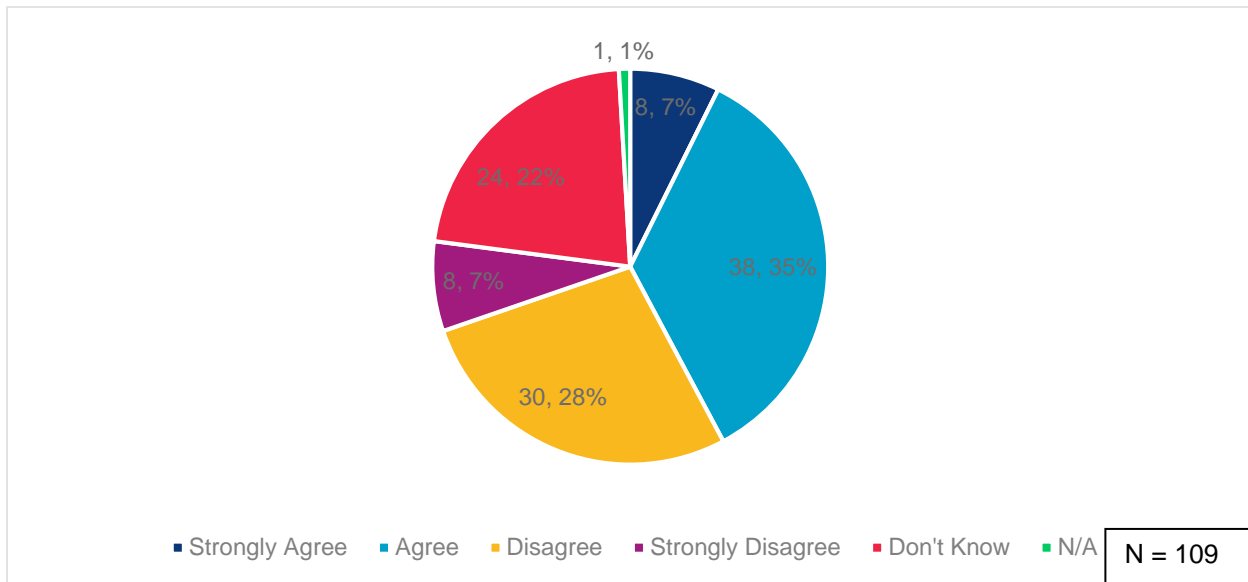
Teachers offered little qualitative data during focus groups on Tier 1 behavioral supports; however, they did offer in the survey the following comments regarding behavioral supports:

- There was general belief that the reading interventions were effective and that the introduction of a phonics-based reading program was a significant improvement.

- There was concern that the AIS Math support was only available before or after school which did not make it available to all the students who would benefit.

- There was concern that the quality of the AIS Reading and Math services varied widely and that they started too late in the school year. Some administrators shared it was a challenge to find teachers to fill AIS roles.

The PCG consultants all reported that professional staff referred to RtI; and that there were RtI meetings regarding individual students. It was further explained that teachers completed a series of forms that described the challenge, showed what was attempted and attached relevant data. As a result, suggestions were made as to how to effectively address these individual students' needs. However, it is unclear as to the existence or the implementation of any Tier 2 and/or Tier 3 supports or an established criterion to apply to students for the purposes of moving from one tier to the next. There was no consistent response to how the "RtI" system works or what is available within each Tier. In addition, this system did not appear to be either available or consistently applied across the schools. The district should be recognized for having a system for teachers to refer students who are struggling and the availability of various supports.

CCSD leverages Academic Intervention Services (AIS) into its RtI. AIS a supplemental component of the district's general education program and not a replacement instruction for general education or special education. AIS are used in Language Arts and Math instruction either during the day or before/after school. This is open to all students and students with disabilities have AIS written into their IEP making it a special education practice.

During 2 out of 6 central office administrator interviews shared concerns about the consistency of AIS programming across schools; some 5 out of 8 school administrator interviews shared concerns about AIS program implementation and quality.

Special Education Referral Practices and Evaluations

In accordance with federal IDEA law, following a referral for special education services, the parent or guardian is provided notice to a meeting to determine the need for an evaluation.

Timeliness of Special Education Referrals in CCSD

In the CCSD staff survey, staff were asked to agree or disagree with the following statement: "There was no delay in the process when a student is referred for special education services." Approximately 12 percent strongly agreed and 45 percent of educators agreed.

Exhibit 16. Staff Survey: There was no delay in the process when a student is referred for special education services.

Legend: ■ Strongly Agree ■ Agree ■ Disagree ■ Strongly Disagree ■ Don't Know ■ N/A   N = 109

Pie chart values: 13, 12%; 49, 45%; 20, 18%; 4, 4%; 19, 17%; 4, 4%
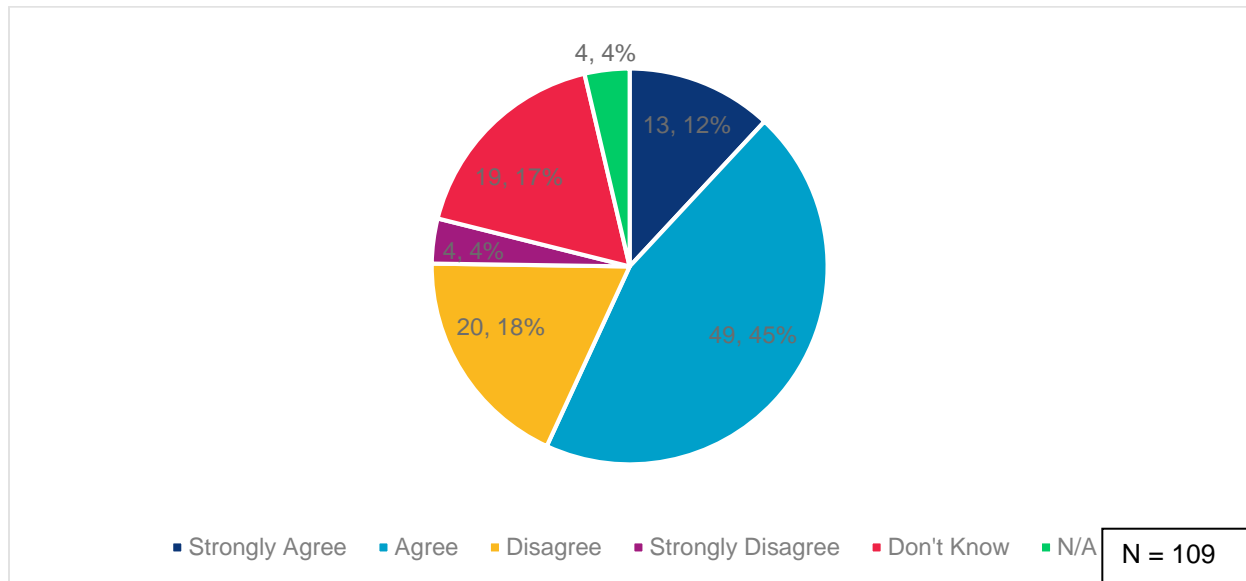
In the CCSD staff survey, staff were asked to agree or disagree with the following statement: "Special education evaluations are sufficiently comprehensive to identify students' specific strengths and needs." Approximately 33 percent strongly agreed and 42 percent agreed.

Exhibit 17. Staff Survey: Special education evaluations are sufficiently comprehensive to identify students' specific strengths and needs.

Strongly Agree ■ Agree ■ Disagree ■ Don't Know ■ N/A

N = 109
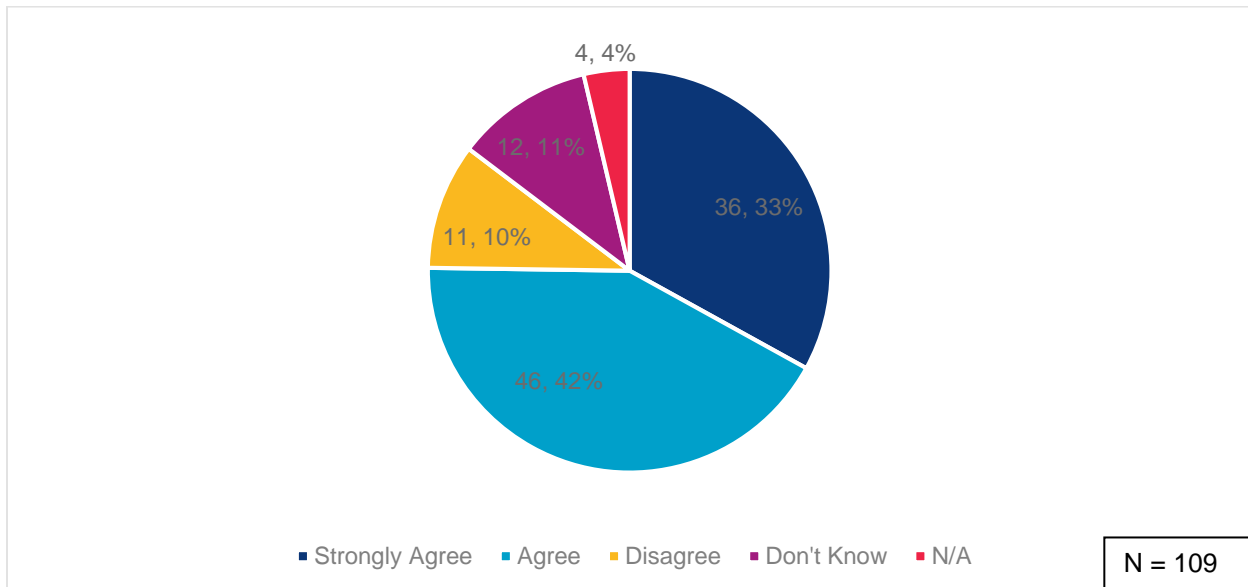
In the CCSD staff survey, staff were asked to agree or disagree with the following statement: "The results of special education evaluations are shared with me in ways that provide meaningful insights into students' educational needs." Approximately 29 percent strongly agreed and 49 percent of educators agreed with that statement.

Some of the parents interviewed expressed concern with the evaluations conducted by the district and believed that the private evaluations were more comprehensive. Some parents also expressed the belief that you had to get a private evaluation in order to have your child classified and eligible for services.

Exhibit 18. Staff Survey: The results of special education evaluation results are shared with me in ways that provide meaningful insights into students' educational needs.

Strongly Agree ■ Agree ■ Disagree ■ Strongly Disagree ■ Don't Know ■ N/A

N = 109
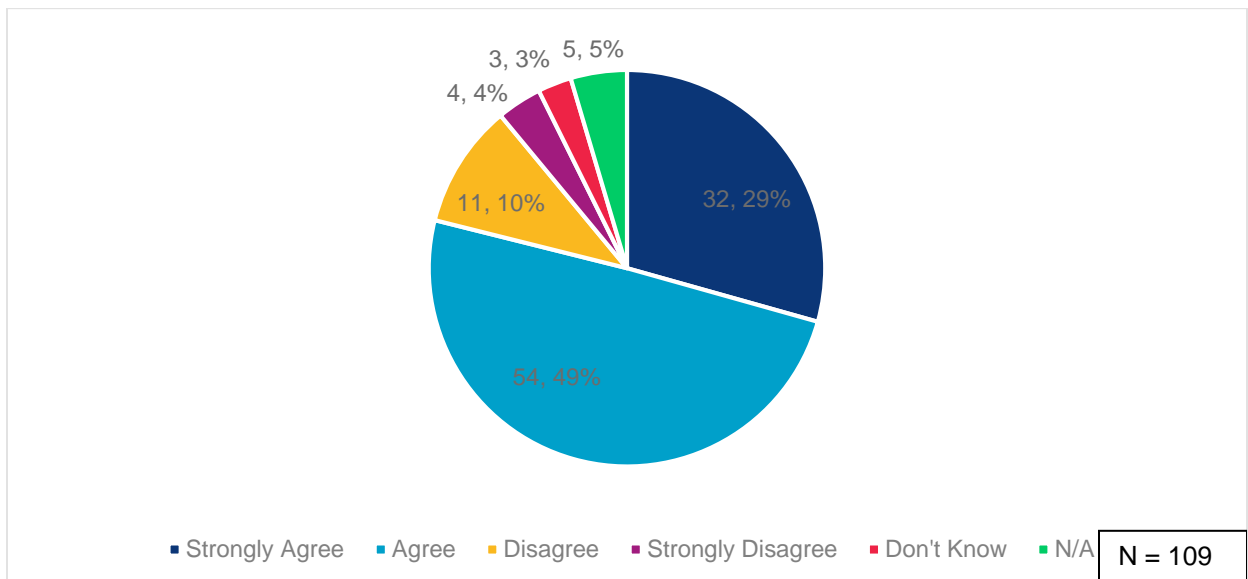
In the CCSD parent survey, parents were asked the following question: "Did district staff explain to you why your child needed special education services in a way that you were able to understand." Approximately 73 percent of parents responded stating "yes."

Exhibit 19. Parent Survey: Did district staff explain to you why your child needed special education services in a way that you were able to understand?

Pie chart legend: Yes, No, Don't Know, Not Applicable. Values shown: 76, 73%; 7, 7%; 4, 4%; 17, 16%. N = 104
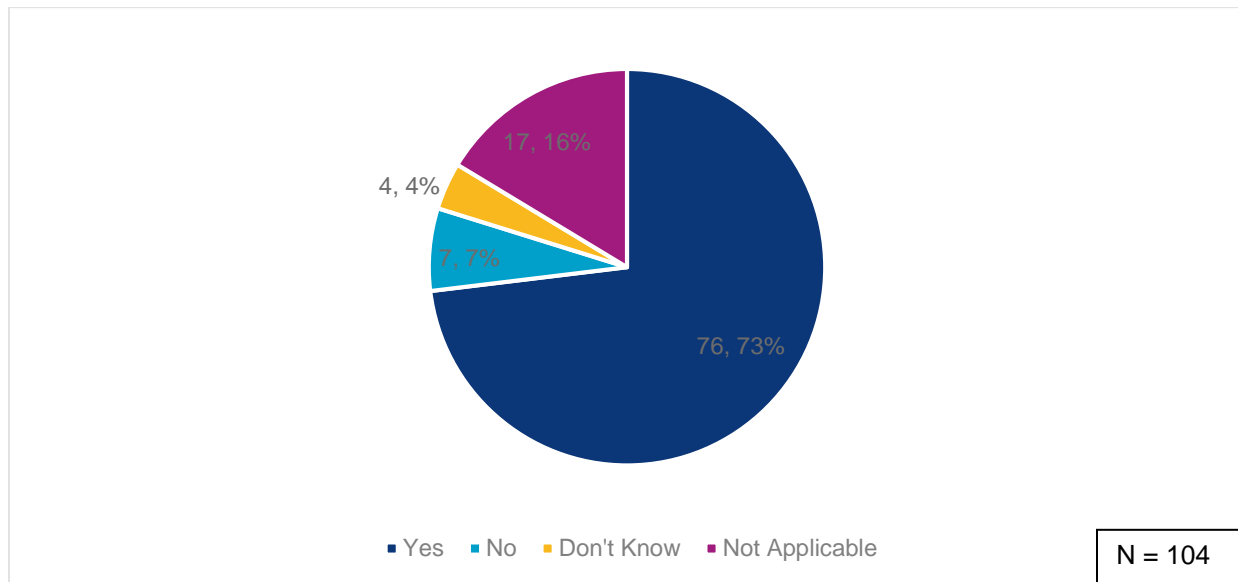
District administration shared that some families request additional scoring reports regarding age/grade equivalency. Administration shared that the scoring of many assessments is computer based and that they can produce additional information about age/grade equivalency. Administration indicated they will produce that information to parents when it is requested; however, they stated they have been advised by professionals that these data should not be part of the score report.

Special Education Eligibility

This section analyzes overall eligibility data.

Overall Special Education Referral and Eligibility Trends

Between 2017-18 to 2019-20, the number of students found eligible for special education has increased (from 27 to 38). At the same time, the number of referrals has increased (from 75 to 100) while the total overall CCSD student body has decreased. During parent focus groups, eligibility was a concern shared by many parents. Many parents shared the felt they needed an outside evaluation in order for their child to be found eligible. Administrators, too, shared concerns about an increase, shared anecdotally, in private outside evaluations. Many teachers shared frustrations over an inconsistent RtI process as part of the district's struggle in consistently providing data-informed CSE referrals.

Exhibit 20. Students Referred and Students Found Ineligible for CSE, 2018-19 to 2020-21
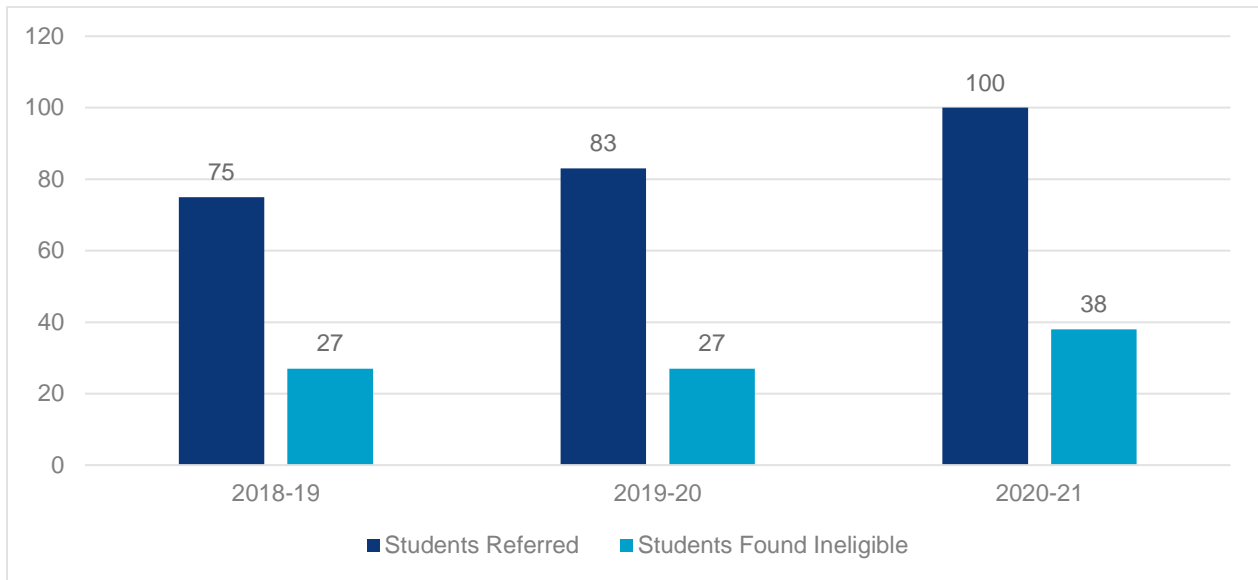
CSE Students Who Exited Special Education Services

The next exhibit is the breakdown of students who exited school-age special education services, excluding students who exited via graduation. Students may no longer receive special education services in a school district for a number of reasons. This chart identifies four reasons provided to PCG by CCSD:

(1) Parents revoked consent for special education services;

(2) The child was declassified by the CSE, this may occur for reasons that include the child's disability no longer impacts the child's academic or functional progress and/or the CSE determined the child would benefit from a 504 Plan instead of an IEP;

(3) CSE Ineligible, occurring when it is determined the child is no longer eligible for special education services;

(4) Moved – Known to Continue, occurring when a child moves out of CCSD and the new school district requests a copy of the child's IEP.

Items two and three require a CSE meeting, whereas revocation of consent can occur at a CSE meeting or in writing.

Exhibit 21. CSE Students Who Exited Special Education Services, 2018-19 to 2020-21
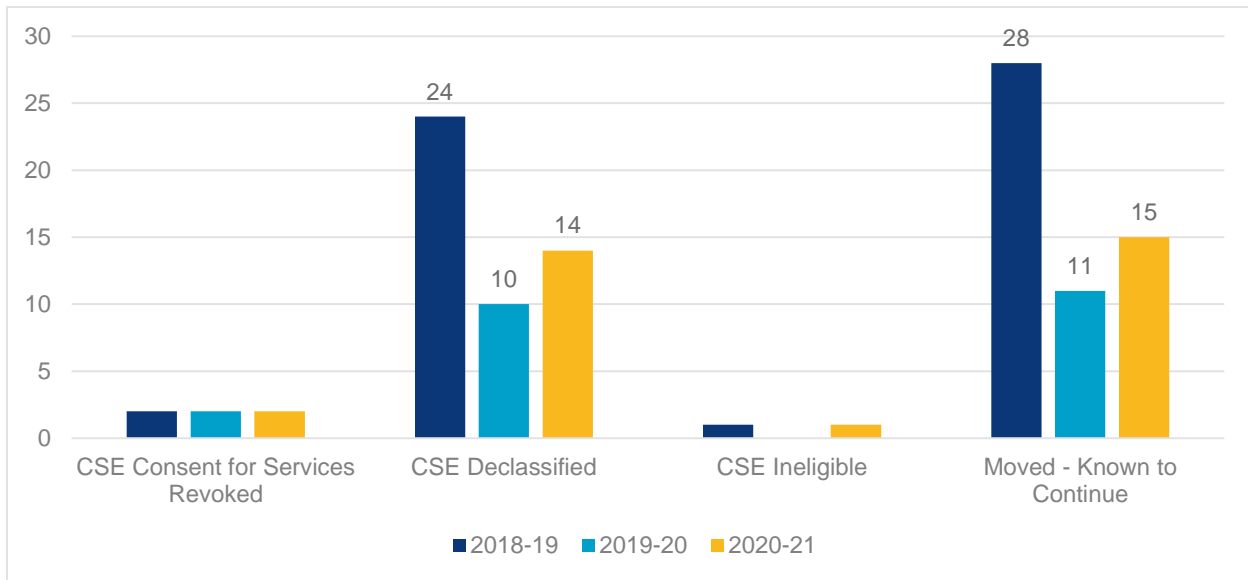
CPSE Students Who Exited Special Education Services

The next exhibit is the breakdown of students who exited preschool special education services. At least annually, the CPSE must meet to conduct an annual review meeting. Part 200.1(c) defines the annual review as:

"…an evaluation, conducted at least annually by the committee on special education, of the status of each student with a disability and each student thought to have a disability who resides within the school district for the purpose of recommending the continuation, modification, or termination of the provision of special education programs and services for the student to the board of education."

Exhibit 22. Preschool Students by August 30 of Final Year in Preschool
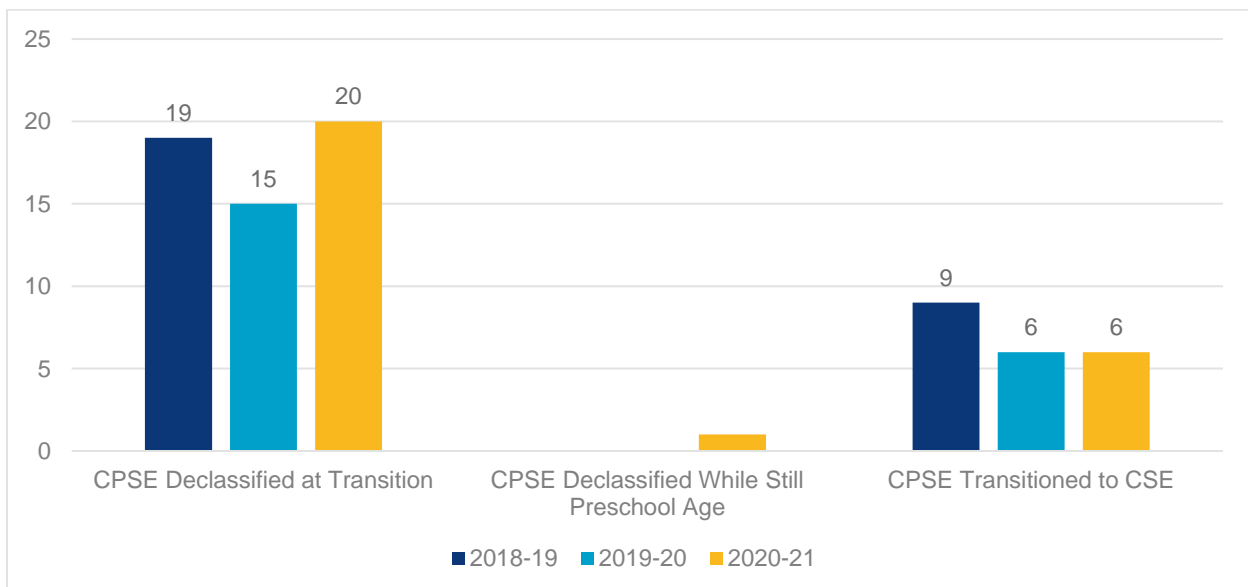
In New York State, a preschooler with a disability ceases to be eligible for special education and/or related services as of August 31st of the school year during which they turn five (as long as they turn 5 prior to

Dec. 1). Therefore, before a preschool student exits August 31st, it is incumbent upon the CPSE to complete an annual review and determine continued eligibility for school age special education services. They must meet before August 30th of the child's final year of preschool and the CPSE in conducting an annual review of the preschooler with a disability, must review relevant data to determine eligibility.

According to Part 200.4 (f), the review must consider the following factors:

(i) the strengths of the student;

(ii) the concerns of the parents for enhancing the education of their child;

(iii) the results of the initial or most recent evaluation of the student;

(iv) as appropriate, the results of the student's performance on any general State or district-wide assessment programs;

(v) the academic, developmental and functional needs of the student;

(vi) the special factors described in paragraph (d)(3) of this section; and

(vii) the educational progress and achievement of the student with a disability and the student's ability to participate in instructional programs in regular education and in the least restrictive environment.

According to information gathered from interviews and focus groups, school-age continued eligibility under School Age classification criteria for preschoolers with a disability entering Kindergarten from preschool is an ambiguous topic among both staff and parents. During parent focus groups, several parents raised the issue that their child was found ineligible for school-age services based on the CPSE's determination and sought private evaluations or district evaluations to find the child eligible for school age services. District personnel indicated changing directives from central office regarding the evaluation protocols for determining whether a child is eligible for school-age services following preschool.

According to information gathered from elementary file review focus groups, school-age continued eligibility under School Age classification criteria for preschoolers with a disability entering Kindergarten from preschool is an ambiguous topic among both staff and parents. During parent focus groups, several parents raised the issue that their child was found ineligible for school-age services based on the CPSE's determination and sought private evaluations or district evaluations to find the child eligible for school age services. District personnel indicated changing directives from central office regarding the evaluation protocols for determining whether a child is eligible for school-age services following preschool.

CSE Process

In the CCSD staff survey, staff were asked to agree or disagree with the following statement: "The CSE team discusses instruction and support in general education classes to the maximum extent possible when making service recommendations for students with disabilities." Some 25 percent strongly agreed and 44 percent of special educators agreed and with that statement.

Exhibit 23. Staff Survey: The CSE team discusses instruction and support in general education classes to the maximum extent possible when making service recommendations for students with disabilities.

Strongly Agree ▪ Agree ▪ Disagree ▪ Strongly Disagree ▪ Don't Know ▪ N/A

N = 109
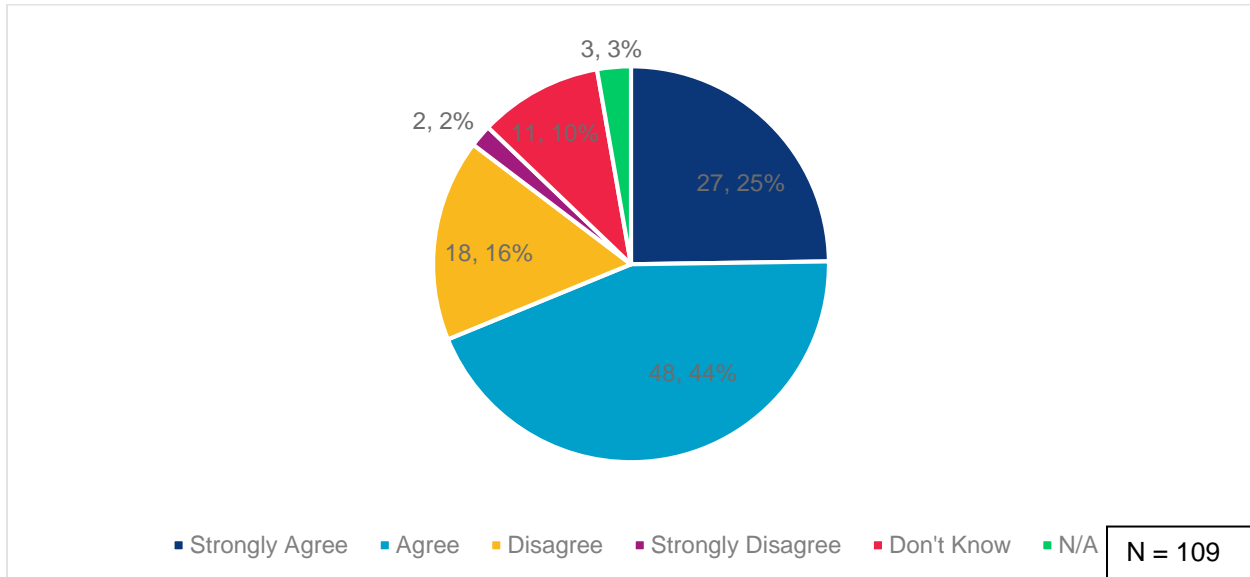
In the qualitative response section of the staff survey, teachers responded with differing perspectives:

During all file review focus groups, it was shared that CCSD's CSE teams primary focus is providing instruction and support in general education classes to the maximum extent possible. And for a small but important group of students, several file review focus groups shared this is sometimes to the students' detriment, as the students' educational needs may not necessarily be met in the general education setting 80 percent or more if the time.

In the CCSD parent survey, parents were asked the following question: "At your child's most recent IEP meeting, did the team discuss receiving special education services in the general education class to the maximum extent possible?" Some 66 percent of parents responded stating "yes."

Exhibit 24. Parent Survey: At your child's most recent IEP meeting, did the team discuss receiving special education services in the general education class to the maximum extent possible?

Yes ▪ No ▪ Don't Know ▪ Not Applicable

N = 104
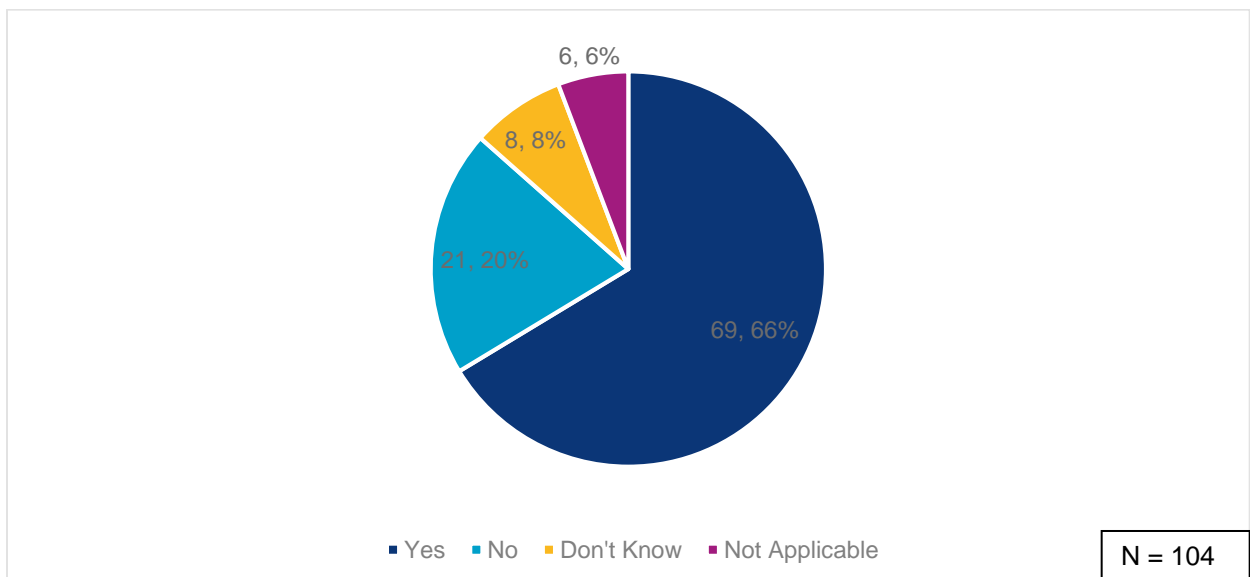
During parent focus groups, many parents expressed concern that their students were evaluated by the district and found ineligible for services however, after securing a private evaluation the students were determined eligible based on the results of the private evaluation.

Present Levels of Performance Statement in the IEP

Within a student's IEP, the Present Levels of Educational Performance (PLEP) serves as the starting point for developing IEP goals. The PLEP is one of the most critical components of the IEP and serves as a snapshot of the student at a specific time and place, providing team members with details on the student's academic achievement and functional performance. A well-crafted PLEP statement incorporates input from a variety of educators and school staff and involves both qualitative and quantitative data, including:

- Performance and mastery of previous year's goals;
- New special education assessment results;
- Performance on district and statewide assessments, including identification of skills and knowledge already attained in relation to grade-level standards;
- Classroom grades and observations, including behavior data;
- Input from the student and parents;
- Interests and strengths, including non-curricular areas; any strategies, accommodations, or assistive technology devices or services that have already shown success;
- Skills in daily living such as social skills, mobility skills, employment skills, and skills that promote student independence.

As appropriate, PLEP statements must include data describing a student's functional skills as well as academic skills. Research has shown that when functional skills are not addressed within the PLEP, students' long-term independent-living outcomes are diminished.[29] In addition, the PLEP statement should provide information related to all goals that are developed within the IEP. For example, a 14-year-old student's IEP should include transition goals rooted in baseline transition data that is clearly detailed in the PLEP. Members of the IEP team must document and update a student's PLEP annually. In doing so, IEP teams must consider relevant data. CSE members must describe the present levels of academic achievement and functional performance, including how the student's disability affects his or her involvement and progress in the general education curriculum. From the PLEP, CSE members must create statements of need which ultimately drive IEP goals.

Based on information gathered file review focus groups, PCG found inconsistencies in the PLEP writing process. Chiefly, PCG noted that many IEPs had lengthy PLEP statements with areas of strength as well as deficiencies noted. Evaluation scores were always noted; however, they were not always integrated into the PLEP, which many general education teachers felt would be useful and important (especially following re-evaluation. Of more concern, there were many instances where PLEPs noted concerns or deficiencies however, they were not noted as needs and/or did not carry over into goals to address the areas of need. Overwhelming, staff shared they have received little to no training on writing PLEP statements or areas of need. They shared they may receive this information from their mentor; however, it is often varied. Also, staff shared they may receive guidance on PLEP writing from administration; however, the turnover in the Special Education Department has led to more inconsistency in the messaging on PLEP writing (as well as IEP writing as a whole).

IEP Goals

Annual IEP goals that are ambitious, relevant, and measurable are a vital part of the IEP process. Considering the *Endrew* case, when developing IEP goals, teams should ensure the goals are grade-

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[29] In 2011, Auers, Lowrey, Douglas, and Sievers analyzed their findings in a journal article appropriately titled: I Can Identify Saturn, but I Can't Brush My Teeth: What Happens When the Curricular Focus for Students with Severe Disabilities Shifts.

appropriate and ambitious. Repeating the same goals from year to year does not meet this standard. Rather, IEP teams must design goals that are reasonably calculated to enable students to be involved in and make progress in the general education curriculum (using alternate achievement standards when appropriate), and that also meet other educational needs related to their disability. Although the Supreme Court did not address IEP delineation of special education, related services, and supplementary aids/services, it is important to remember that IDEA requires a statement of these components to be "based on peer-reviewed research to the extent practicable."[30]

It is a best practice to write IEP goals as **SMART** goals: **S**pecific, **M**easurable, **A**ttainable, **R**elatable, and **T**ime-bound.

During file review focus groups, it was apparent that staff knew the importance of writing SMART goals. However, participants noted the struggles of determining how goals will be measured. In some focus groups, teachers shared they defaulted to an 80% or 85% mastery rate, either because they had been told to do so or they felt it was reliable, however, student data was not driving that decision.

Overwhelming, staff shared they have received little to no training on writing IEP goals. Almost all special education and related service providers repeatedly shared the efforts they take to collect data.

Participants shared they may receive goal writing training from their mentor; however, it is often varied. Also, staff shared they may receive guidance on PLEP writing from administration; however, the turnover in the Special Education Department has led to more inconsistency (as well as IEP writing as a whole). In addition, many new staff shared they have not received training on the use of the district's IEP case management system, leading to inadvertent mistakes.

Accommodations and Modifications in the IEP

IEP accommodations should facilitate access to multiple means of acquiring knowledge and multiple methods of demonstrating skills (aligning to principles of Universal Design for Learning) while also retaining the rigor and high expectations of the New York State Standards.

Providing accommodations to students with disabilities on assignments or assessments maintains the same expectation of mastery as that of nondisabled peers, but with a change in the timing, formatting, setting, scheduling, and/or response or presentation method. Accommodations do not alter in any significant way what a test or assignment measures.[31]

Different than accommodations in the IEP, modifications are an adjustment to an assignment or a test that changes the standard or what the test or assignment is supposed to measure. A modification changes what a student is taught or expected to learn.

During file review focus groups:

- Consultant Teachers shared concerns about the ability to modify content when they are not in the room with the students on their caseload. Many special education teachers shared that general education teachers struggle with modifications when the special education teacher is not in the room.

During parent focus groups:

- Concern was raised by some parents that while the IEPs contained appropriate accommodations and modifications, there was no monitoring of whether they were being implemented and the parent

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[30] Retrieved from https://sites.ed.gov/idea/regs/b/d/300.320/a
[31] Retrieved from:
https://www.ctdinstitute.org/sites/default/files/file_attachments/School%20Accommodation%20and%20Modification%20Ideas%20for%20Students%20who%20Receive%20Special%20Education%20Services%20English.pdf

would need to monitor.   During file review focus groups, administrators concurred that there was no monitoring of implementation.

Meaningful IEP Progress Reporting

IDEA requires IEP teams to develop annual measurable academic and/or functional IEP goals that are aligned to state standards. Each IEP goal should include benchmarks or short-term objectives as well as criteria to measure goal mastery and must address needs resulting from the student's disability for the student to be involved in and progress in the general education curriculum. As stated earlier, we recommend that IEP goals be written using the SMART format -- **S**pecific, **M**easurable, **A**chievable, **R**elevant, and **T**ime-bound. The purpose of developing SMART IEP goals is to support the measurement of student progress toward goal mastery.

Progress monitoring is a research-based practice used to assess a student's progress toward IEP goals and evaluate the effectiveness of instruction and intervention. Progress monitoring informs the teacher, student, and family regarding what a student has learned and what requires additional intervention or still needs to be taught. IDEA requires IEPs to contain a description of how the student's progress will be measured and how often reports on progress will be provided.

During file review focus groups, staff shared the challenges they have in progress monitoring, especially at the middle school level, because of the limited time they have in the classroom if they are a consultant teacher. Many of the items within goals may not be observable during the time the special education teacher is in the classroom. Some special education teachers shared that general education teachers sometimes are reluctant or unwilling to collect data and/or support IEP goals when the special education teacher is not in the classroom.

It was also identified that the goals CSE teams frequently write are skill based while the instruction is content based, is sometimes an inherent mismatch between the instruction and the goals.

In the CCSD staff survey, staff were asked to agree or disagree with the following statement: "Student progress toward IEP goals is analyzed and discussed regularly by his/her teachers and/or related service provider(s)." Some 26 percent of educators strongly agreed and 49 percent agreed with the statement.

Exhibit 25. Staff Survey: Student progress toward IEP goals is analyzed and discussed regularly by his/her teachers and/or related service provider(s).

Legend: ■ Strongly Agree ■ Agree ■ Disagree ■ Don't Know ■ N/A

N = 109

Pie chart values: 28, 26%; 53, 49%; 19, 17%; 8, 7%; 1, 1%
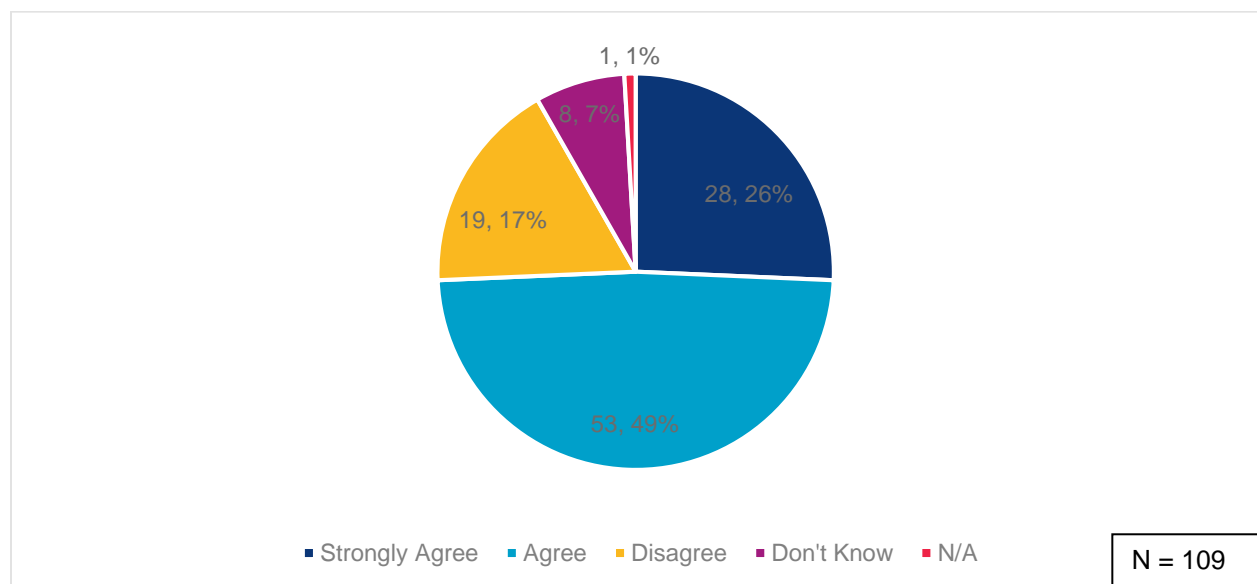
During parent focus groups, the following was shared:

- There were several concerns raised in parent focus groups about the lack of interventions provided in the general education setting and the time it took to begin the evaluation process for students suspected of having a disability.

- Some parents expressed the concern that they received letters of their child receiving tiered interventions, but they did not receive progress reports and the student remained in the interventions until they requested an evaluation.

On the parent survey, parents were asked to respond to the following statement: "My child's progress report effectively communicates positive progress and/or lack of progress. Some 16 percent strongly agreed 42 percent agreed with that statement.

Exhibit 26. Parent Survey: My child's progress report effectively communicates positive progress and/or lack of progress
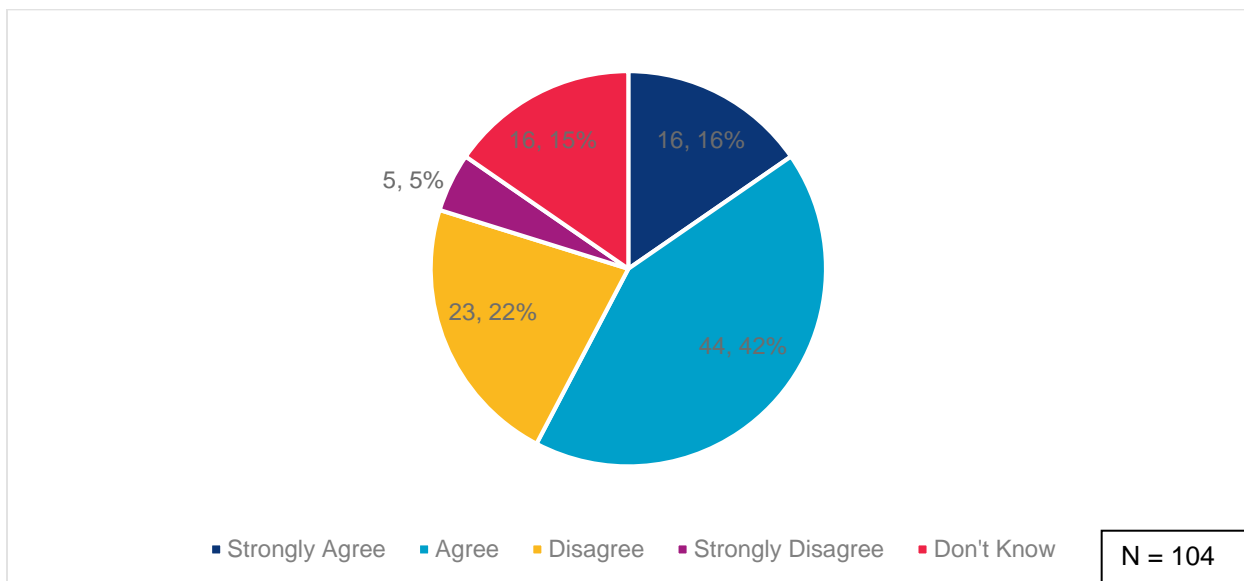
Some parents expressed concern that progress was monitored against the IEP goals and the students always demonstrated progress, however no progress was reported against the grade level expectations. Parents were concerned that they did not really know how their students were progressing.

CSE Collaboration

In the CCSD staff survey, staff were asked to agree or disagree with the following statement: "Staff in my building(s) have an effective process by which they collaborate with each other regarding the needs of students with disabilities." Some 15 percent strongly agreed and 39% percent of staff agreed with that statement.

Exhibit 26. Staff Survey: Staff in my building(s) have an effective process by which they collaborate with each other regarding the needs of students with disabilities.

Legend: ■ Strongly Agree   ■ Agree   ■ Disagree   ■ Strongly Disagree   ■ Don't Know   ■ N/A   N = 109
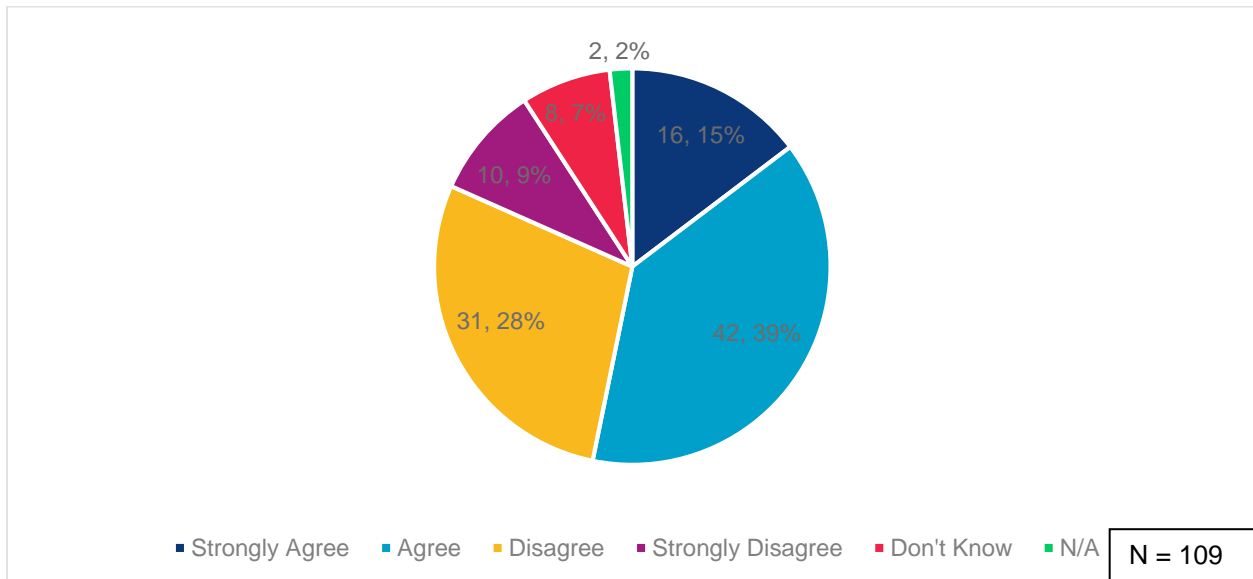
In the CCSD staff survey, staff were asked to agree or disagree with the following statement: "I am given adequate time/coverage when participating in CSE meeting(s)." Some 24 percent strongly agreed and 33 percent of staff agreed with the statement.

Exhibit 27. Staff Survey: I am given adequate time/coverage when participating in CSE meeting(s).

Legend: ■ Strongly Agree   ■ Agree   ■ Disagree   ■ Strongly Disagree   ■ Don't Know   ■ N/A   N = 109
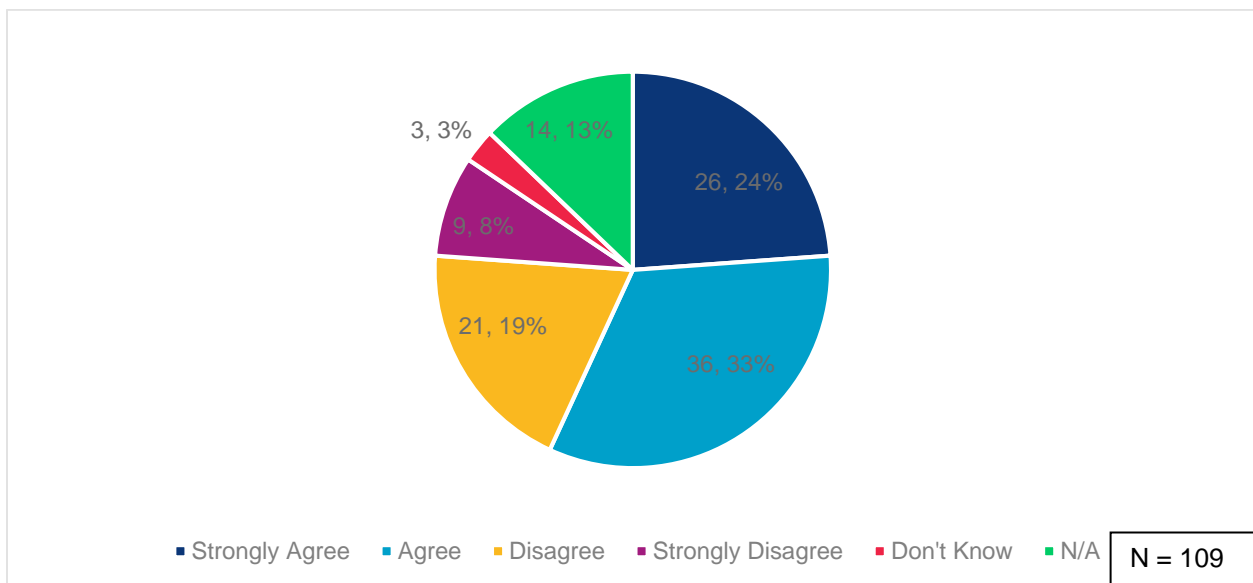
Continuum of Services for Students with Disabilities

As stated earlier, IDEA requires students with IEPs to receive a Free and Appropriate Public Education (FAPE) in their Least Restrictive Environment (LRE) to meet their needs. In order for districts to improve the academic achievement and reduce the achievement gap of students with disabilities, as compared to nondisabled peers, they must be included in the core curriculum and receive targeted, evidence-based interventions that are implemented with fidelity.

Each district must make available a continuum of services ranging from regular classes with special education support to arrangements for residential placement. IEP placement decisions are to be based on each student's individualized needs rather than service availability or preset arrangements with no flexibility. According to a recent paper on this matter by the IRIS Center at Vanderbilt University:

> *Placement options are fluid. A student might receive some services in one setting and other services in a different setting. Further, placements can change over time based on factors such as changes in a student's progress or needs. For some students, the general education classroom is not necessarily the least restrictive setting.* [32]

As stated previously, students with IEPs are required to receive special education services in the least restrictive environment based on their needs, whether that is a general education classroom, a special education classroom, a special school (either within or outside of the school district), homebound instruction, or in a hospital or residential setting. It is important to note that student placement should never be based solely on the student's identified disability (i.e., a student who has been identified as having an intellectual disability should not automatically be placed in a self-contained/separate classroom).

Inclusion Defined

Richard Vila and Jaqueline Thousand (2021), forerunners in the field of inclusion, posit that "Inclusive education is both a vision and a practice. Namely, inclusive education is both the vision and practice of welcoming, valuing, empowering, and supporting the diverse academic, social and emotional, communication, and language learning of all students in shared environments and experience for the purpose of attaining the desired goals of education…Inclusive education is also about the practice of differentiating instruction for students through collaborative planning and teaching among all members of the school community, including students and families."[33] It is important to note that inclusion is not the same as mainstreaming or integration – both terms specific to the physical placement of students with disabilities in the same classroom as their typically developing peers.[34]

Under IDEA, school districts are required to place students with disabilities in the least restrictive environment. Interestingly, the term "inclusion" is not included in IDEA. The US Department of Education has articulated this in greater detail by stating the following in a memo:

> *LRE means that, to the maximum extent appropriate, school districts must educate students with disabilities in the regular classroom with appropriate aids and supports, referred to as "supplementary aids and services," along with their nondisabled peers in the school they would attend if not disabled, unless a student's individualized education program (IEP) requires some other arrangement.*
>
> *This requires an individualized inquiry into the unique educational needs of each disabled student in determining the possible range of aids and supports that are needed. Some supplementary aids and services that educators have used successfully include modifications to the regular class curriculum, assistance of an itinerant teacher with special education training, special education training for the regular teacher, use of computer-assisted devices, provision of notetakers, and use of a resource room, to mention a few.*
>
> *In implementing IDEA's LRE provisions, the regular classroom in the school the student would attend if not disabled is the first placement option considered for each disabled student before a more restrictive placement is considered. If a student with a disability can be educated satisfactorily with*

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[32] https://iris.peabody.vanderbilt.edu/wp-content/uploads/pdf_info_briefs/IRIS_Least_Restrictive_Environment_InfoBrief_092519.pdf
[33] Villa, JS, Thousand, RA (2021) The Inclusive Education Checklist: A Self-Assessment of Best Practices. National Professional Resources, Inc., NY
[34] Id.

appropriate aids and supports in the regular classroom in the school the student would attend if not disabled, that placement is the LRE placement for that student.

However, if the placement team determines that a student cannot be educated satisfactorily in that environment, even with the provision of appropriate aids and supports, the regular classroom in the school the student would attend if not disabled is not the LRE placement for that student. Any alternative placement selected for the student outside of the regular educational environment must maximize opportunities for the student to interact with nondisabled peers, to the extent appropriate to the needs of the student.

IDEA does not require that every student with a disability be placed in the regular classroom regardless of individual abilities and needs. This recognition that regular class placement may not be appropriate for every disabled student is reflected in the requirement that school districts make available a range of placement options, known as a continuum of alternative placements, to meet the unique educational needs of students with disabilities.

Throughout PCG's interviews with teachers and administrators, PCG repeatedly heard: "We do not have a continuum of services in Chappaqua." These sentiments were shared during 3 of the 6 central office administrator interviews and 6 out of the 8 building administrator interviews. To some, this was a point of strength. To others, this was a significant deficiency. Of those who noted this as a deficiency, they noted that it is impacting a small number of students; however, the impact on this small number of students was notable and potentially detrimental.

In the CCSD staff survey, educators were asked to agree or disagree with the following statement: "CCSD offers a continuum of services to meet the needs of all students with IEPs." Some 10 percent strongly agreed and 24 percent agreed with that statement.

Exhibit 28. Staff Survey: CCSD offers a continuum of services to meet the needs of all students with IEPs.

Legend: ■ Strongly Agree ■ Agree ■ Disagree ■ Strongly Disagree ■ Don't Know ■ N/A   N = 109

Pie values: 1, 1%; 11, 10%; 26, 24%; 37, 34%; 24, 22%; 10, 9%
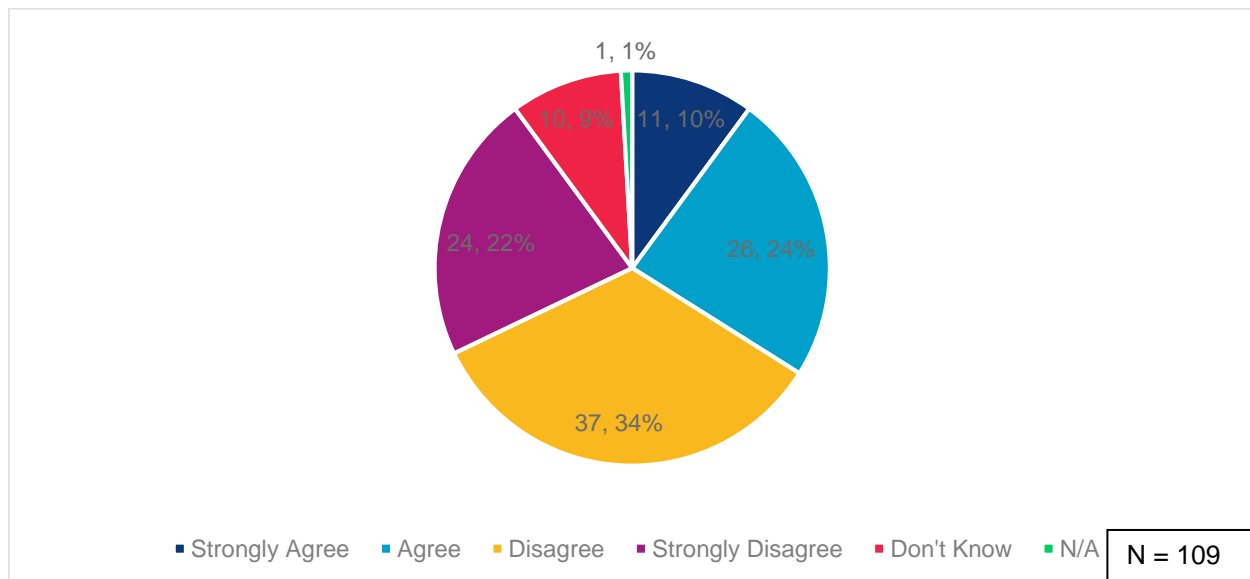
Philosophy of "Full Inclusion" and Continuum of Services in CCSD

Based on classroom visits conducted by PCG as well as interviews and focus groups, the continuum of special education services in CCSD appears to be limited and based on available services as opposed to student needs. The district has a philosophy of full inclusion, however what this means is not clear or consistent across the district. It is very important to note the vast majority of students are successfully served within general education classroom with many supports and services. However, administrators,

teams, and parents alike all agreed that the while services are available and flexible at the elementary level, and at the High School, they are not at the middle school. According to information gathered from parent interviews, file review focus groups, and administrators, there are limits to the hours of services available and a student who needs more or a different type cannot be included and instead may be sent out of district. Small group instruction, resource room, co-teaching are areas that need to be addressed to successfully include students in the school.

As shared earlier, through information gathered from interviews, focus groups, and the staff survey, many teachers and some administrators believe that inclusion and mainstreaming are the same.

Many administrators, staff and families expressed frustration with the limitations on services and the lack of program options for those students who require them.

Staff and administrators expressed concern that some students were in the general education class, however the instruction they received was often distinctly different from the class and provided physically apart. In the appropriate effort to provide services at the instructional level, students received assistance from 1 to 1 aides also separately from the class.

In the CCSD staff survey, educators were asked to respond to the following: "It is frequently stated within CCSD that the District has a philosophy of "full inclusion" for its students with IEPs. Do you believe there is a common definition in your building around "full inclusion?" Approximately 53 percent of educators responded stating "yes."

Exhibit 29. Staff Survey: It is frequently stated within CCSD that the District has a philosophy of "full inclusion" for its students with IEPs. Do you believe there is a common definition in your building around "full inclusion?
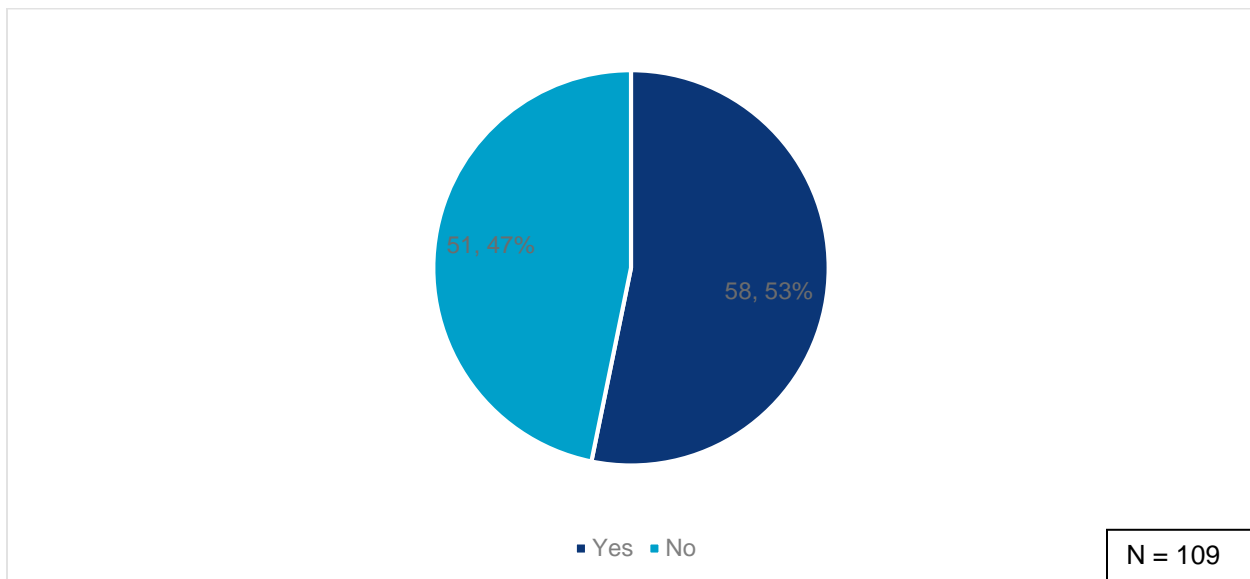
Staff were also asked to verbally articulate their definition of "full inclusion." Some 35 percent (30 out of 86) educators provided responses focusing entirely on "full inclusion" being the physical space of where students learn. Some 7 percent (6 out of 86) articulated that "full inclusion" is both providing an education in the general education setting with differentiation. The remaining 49 educators, 56 percent, articulated participation in the general education setting with accommodations and modifications.

Below is a sampling of the free-typed responses in the survey:

Focus on the Place Where Students with Disabilities Learn

- "Everyone is welcome and included in all classrooms."

- "All children educated in the same setting."

- "Including extremely disabled (Multi-Handicapped/Autistic/Intell. Disability) students in regular classrooms"

- "No matter what, whether it is educationally appropriate or not, all students should be in gen ed classes all the time."

- "The student is in the classroom all day long participating in all curriculum areas at the same time as the general ed population."

- "Special needs students are not separated from other students in their classes"

- "All students are included in every class, regardless of their specific disability and/or ability to participate in the class."

- "A child will participate in a mainstream class as long as the program can be accessed."

- "Children with IEPs or 504 accommodations are all included in one classroom."

Focus on Differentiating Instruction in the General Education Setting

- "Students fully included in all aspects of education- work is differentiated to meet all student needs"

- "Special education students are instructed within the regular classroom setting; differentiation is implemented as needed."

- "To me, full inclusion is a school where a general education teacher can do the same job as a special education teacher. Where the roles are intertwined, not separated. An environment where severely disabled students can participate in social activities with regular students without it being forced. It is a classroom with different levels but all are accessing the content in their own way."

- "Full inclusion in my opinion, is when a student with an IEP is immersed in a classroom and is given tools (differentiation, modified assessments, etc.) in order to succeed."

- "On a grade level, all students are present in a classroom, regardless of classification, and are all participating in the lesson. Students are all treated equitably and are given the opportunity to have meaningful collaboration with their peers and teachers. Classes are skill based, on a continuum - to allow for different learners."

Educational Environment Rates for School-Age Students with Disabilities

The data in this section reflect the educational settings of CCSD school-aged students overall, as well as by disability areas and race/ethnicity. In addition, district data are compared to state data and national data, and SPP targets for the three educational setting categories monitored by the US Department of Education's Office of Special Education Programs and the New York State Education Department for students ages 6-21. The department also requires each state to monitor and set targets in their SPP for educational settings in which students with IEPs are educated.

Overall Educational Setting Data for CCSD and State

Longitudinal data from the school years between 2015-16 to 2019-20 indicate that CCSD students with disabilities were educated more frequently in an inclusive general education setting and less frequently in a separate setting.

Exhibit 30. Educational Setting Data for CCSD, 2015-16 to 2019-20[35]
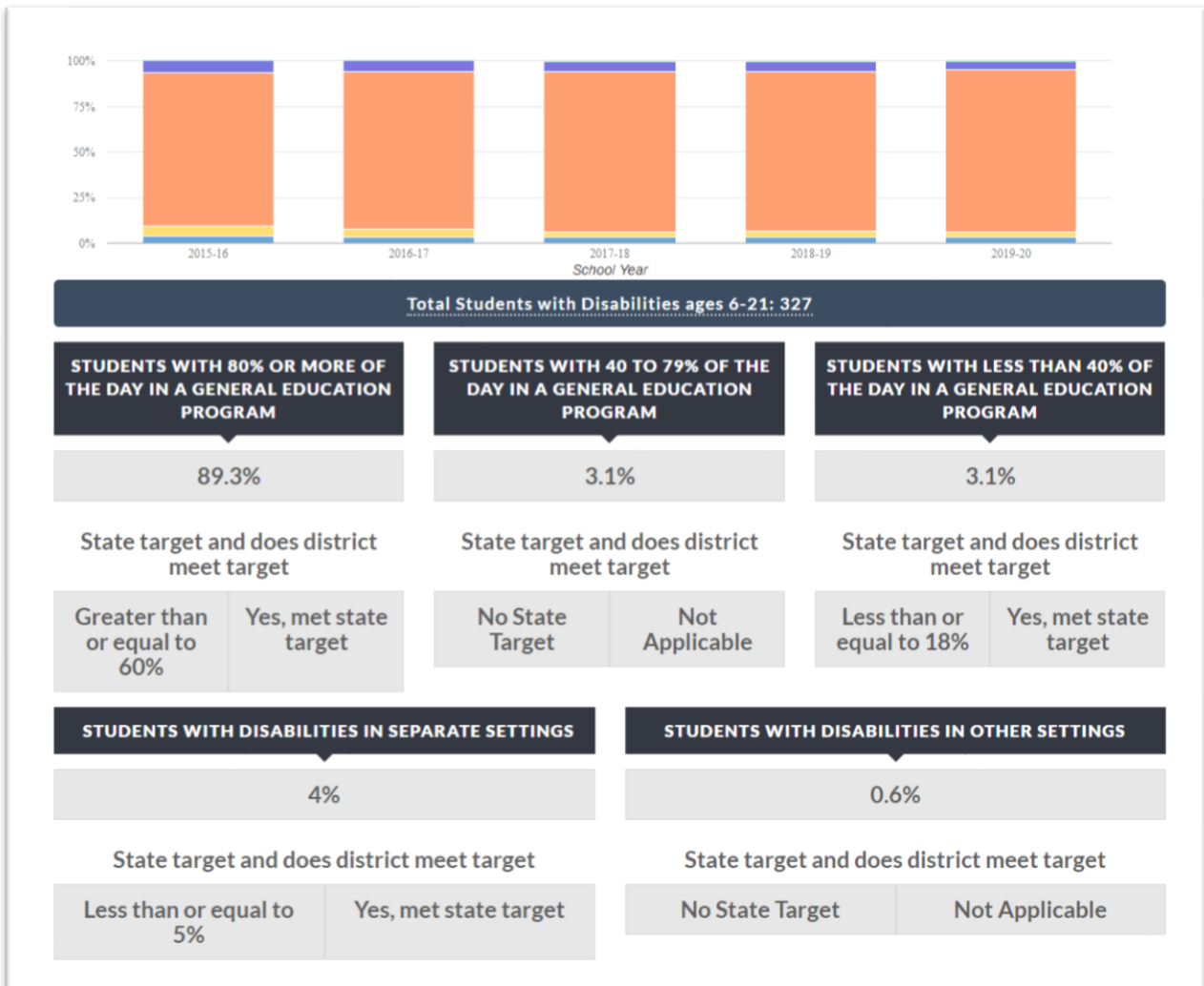
Among districts that have at least 100 or more students with IEPs, CCSD has the second highest rate of students with IEPs spending 80% or more of the day inside the regular classroom in New York State.

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[35] NYSED BEDS Data, 2015-16 to 2019-20

Exhibit 31. Educational Settings of Students with IEPs, Districts of 100 or More Students in New York State With IEPs Who Have the Highest Number of Students with IEPs Spending 80% or More of the Day in the General Education Setting[36]
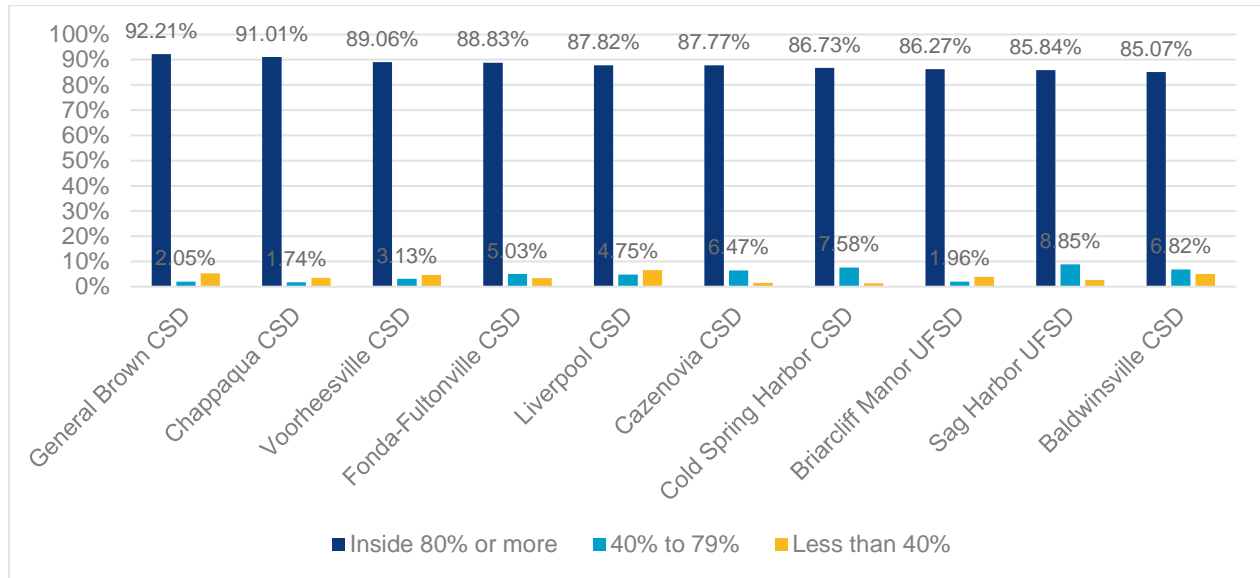
In reviewing peer districts, Chappaqua has the highest number of students with disabilities in a setting with peers at least 80% of the time.

Exhibit 32. Educational Environments of Students with Disabilities in Peer Districts[37]
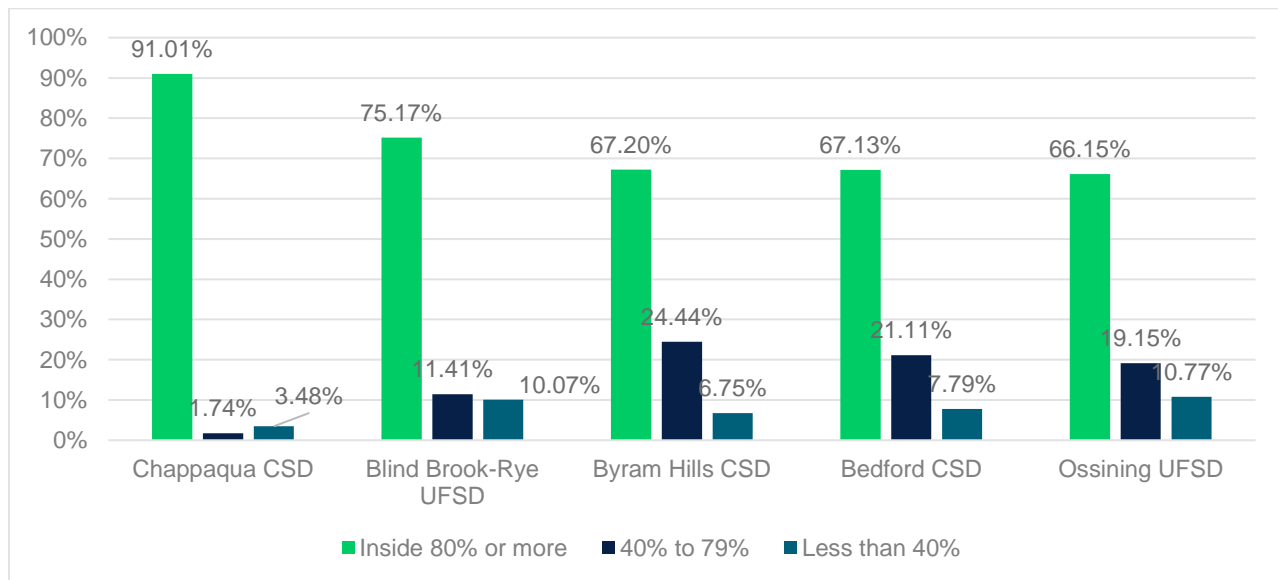
Out of District Placements

There may be times when the CSE determines that a child's needs are so complex that they have to receive FAPE in an LRE that is outside of their home school and or district. In the 2020-21 school year, CCSD had 23 students placed by CSE in out of district placements (18 day programs, 5 residential). In the 2019-20

[36] NYSED BEDS Data
[37] NYSED BEDS Data

school year, there were 27 students placed by CSE in out of district placements (22 day programs; 5 residential); and in the 2018-19 school year, 32 students placed by CSE in out of district programs (26 day programs, 6 residential).

As seen in the next exhibit, over the past three school years, the top two out of district disability classifications are (1) Autism; (2) Multiple Disabilities. In both classifications, the numbers of students has declined.

Exhibit 33. Out of District Placements by Disability Classification, 2018-19 to 2020-21 School Years[38]
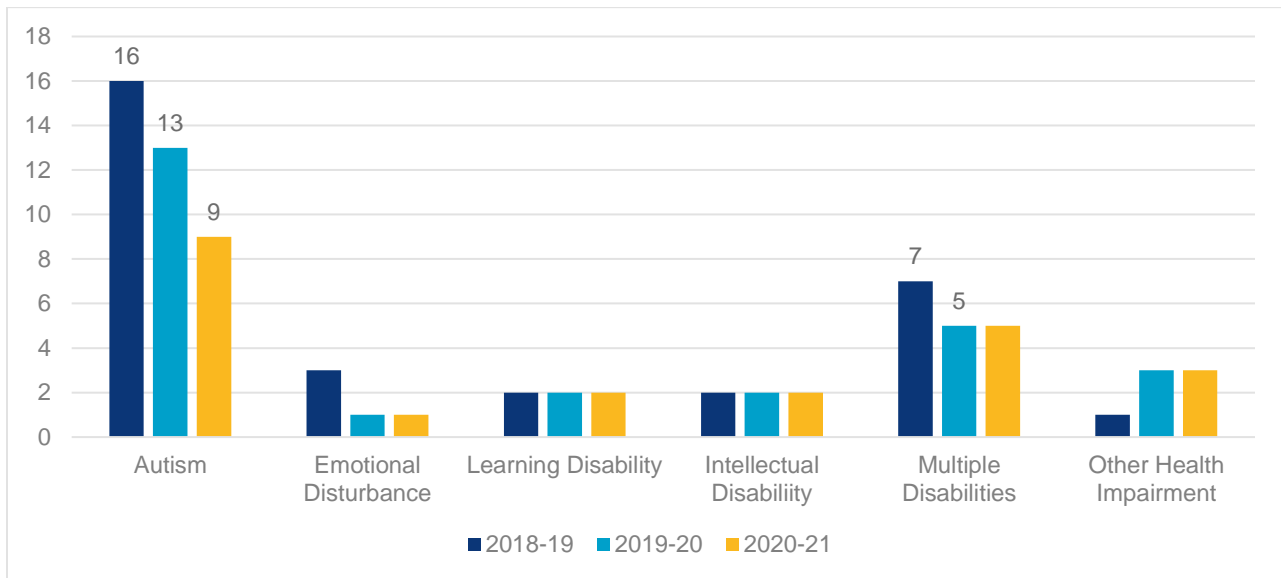
As seen in the next exhibit, over the past three years, the majority of students placed out of district are in the middle and high school grades.

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[38] CCSD Provided Data

Exhibit 34. Out of District Placements by Grade Level, 2018-19 to 2020-21 School Years[39]
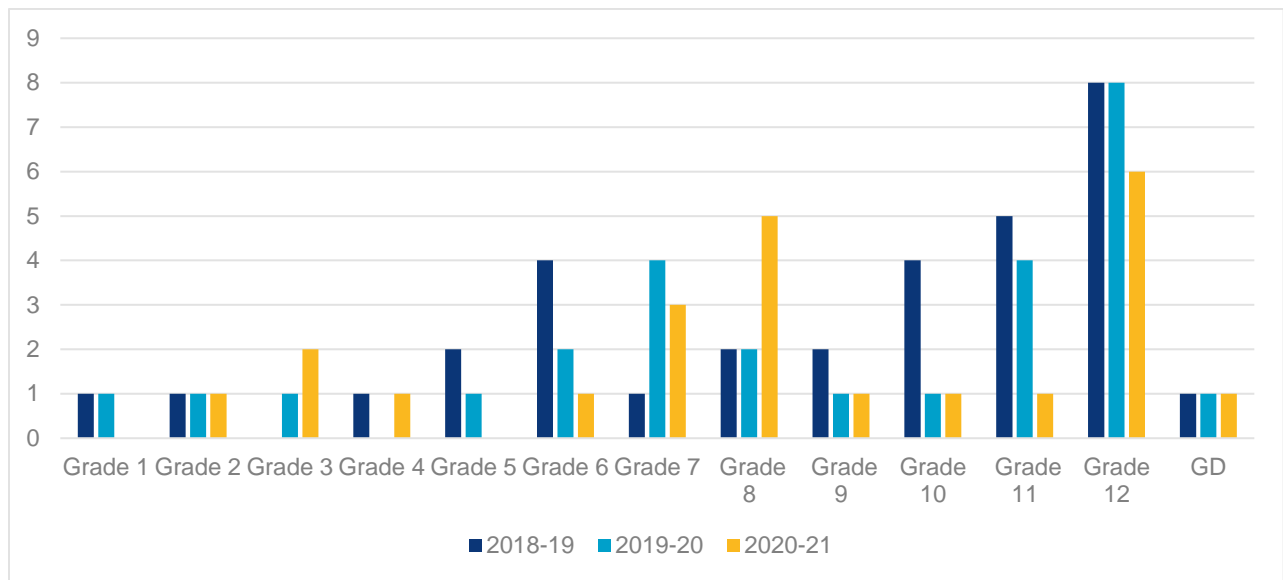
CCSD has the 213th lowest number of out of district placements in New York State, at 3.19 percent. Among the selected peer districts, it has the second highest rate of students placed out of district.

Exhibit 35. Out of District Placements – Peer Districts[40]
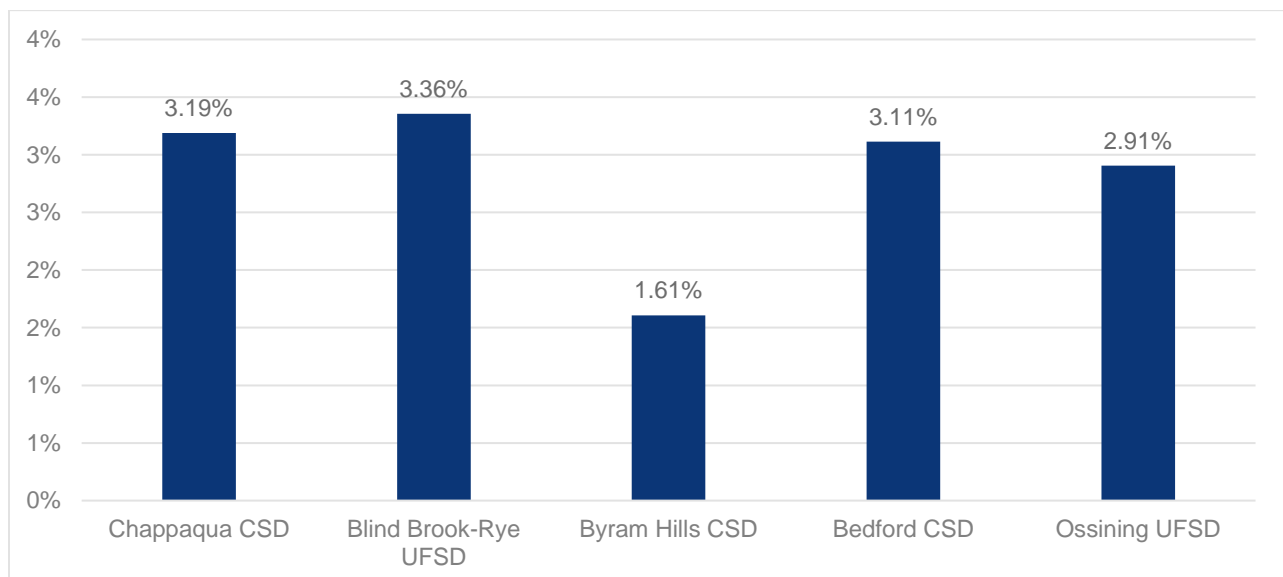
PCG's Classroom Visits

As part of PCG's classroom visit process, PCG consultants implement a series of in-person visits using a random sample of classrooms. These classroom visits provide information that are further used to triangulate other data sources such as interviews, focus groups, and file review focus groups. The classroom visits documented classroom physical attributes as well as the presence and

[39] Id.
[40] NYSED BEDS Data

implementation of common general and special education research-based activities, strategies and interventions (evidence-based practices) implemented within the classroom.

The professional literature supports an overall correlation between the use of evidence-based educational practices and accelerated student learning.[41] These practices are documented by the U.S. Department of Education which gives states and local school districts flexibility in choosing which of these activities, strategies, and interventions are most appropriate for their students with / without disabilities.[42]

PCG's classroom visits are focused on core instructional practices, supplementary aid and services, accommodations/adaptations and approaches to personalized instruction as well as the foundational general education instructional features of Universal Design for Learning and Differentiated Instruction.

PCG has developed a protocol to guide the classroom visits and included both general education Tier 1 features and special education practices. The protocol was sent prior to the administration to assure clarity in the content of the classroom visits.

PCG conducted in-person classroom visits within each of the six district schools, and within a representative number of classrooms which classified students were placed. The classroom visits lasted from 15-45 minutes, depending on the school. Subsequently, three PCG consultants observed 58 classrooms reflecting the following settings and classroom placements:

- General Education Classrooms in which there was only a General Educator
- General Education Classrooms using a Teacher Consultant Model
- General Education Classrooms using a Special Education Teaching Assistant
- Learning Centers with exclusive use of Special Education Teachers
- Related Services such as Speech & Language (Pull Out)
- Reading as a Related Service
- High School Self-Contained Transition Program

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

PCG's Classroom Visit Protocol used a written framework of specific "indicators" or "practices" that are recognized as critical to the education of students with learning differences; and appeared to be observable. However, special considerations and adaptation are necessary to gain a fair and legitimate approach to identifying and/or validating targeted instructional strategies under the conditions of short classroom visit schedule. As a result, the following process narrows the targets of the visits to include only those practices that may be easily observable.

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[41] Odom SL, Brantlinger E, Gersten R, Horner RH, Thompson B, Harris KR. Research in Special Education: Scientific Methods and Evidence-Based Practices. Exceptional Children. 2005;71(2):137-148. doi:10.1177/001440290507100201
[42] Leveraging Evidence-Based Practices for Local School Improvement - Office of Elementary and Secondary Education: https://oese.ed.gov/resources/oese-technical-assistance-centers/state-support-network/resources/leveraging-evidence-based-practices-local-school-improvement/

In addition, to gaining an overall impression of instruction and classroom environment, this visits sought to find evidence of the presence and implementation of (1) Elements of Universal Design for Learning / Differentiation of Content, Process & Product; (2) The presence of practices reflecting social/emotional learning and support including behavior support (3) Use / Evidence of a System of Tiered Support; (4) Features of Inclusive Instructional Special Education Practices; (5) Implementation of Accommodations / Modifications; (6) Presence of Specially-Designed Instruction; (7) Approaches to Co-Teaching; and (8) Features of a Collaborative Consultation Model.

Exhibit 36. Evidence Sought During PCG Classroom Visits: Terms, Definitions, and Citations

Term	Definition	Citation
Universal Design for Learning (UDL)	Universal Design for Learning (UDL) is a framework to improve and optimize teaching and learning for all people based on scientific insights into how humans learn.	**CAST** https://udlguidelines.cast.org/
Differentiation	Differentiation means tailoring instruction to meet individual needs. Whether teachers differentiate content, process, products, or the learning environment, the use of ongoing assessment and flexible grouping makes this a successful approach to instruction.	**Dr. Carol Ann Tomlinson** Tomlinson, C. A. (August, 2000). Differentiation of Instruction in the Elementary Grades. ERIC Digest. ERIC Clearinghouse on Elementary and Early Childhood Education.
Social/ Emotional Learning & Support	Social/Emotional Learning and Support includes school-wide and individualized approaches to behavior, social integration, etc.	**PBIS** https://www.pbis.org/pbis/tiered-framework
Tiered System of Supports (MTSS / RtI)	Tiered System of Supports is a framework that helps educators provides academic and behavioral strategies for students with various needs. MTSS grew out of the integration of two other intervention-based frameworks: Response to Intervention (RtI) and PBIS.	**RTI Action Network** http://www.rtinetwork.org/essential/tieredinstruction/tier1/accurate-decision-making-within-a-multi-tier-system-of-supports-critical-areas-in-tier-1
Inclusive Instructional Special Education Practices (*Evidence-Based	An evidence-based teaching strategy is any approach to teaching that is supported by research.	Burns MK, Ysseldyke JE. (2009). Reported Prevalence of Evidence-Based

Instructional Strategies)		Instructional Practices in Special Education. The Journal of Special Education.43(1):3-11. doi:10.1177/0022466908315563
Accommodations	An accommodation is an effort to provide equal access to curriculum content, instruction or the environment. Accommodations are typically grouped into four categories: presentation, response, setting, and timing and scheduling.	**IRIS Center** Vanderbilt University
Modifications	A modification is an adjustment to an assignment or a test that changes the standard or what the test or assignment is supposed to measure. A modification changes what a student is taught or expected to learn.	**Wrightslaw** https://www.wrightslaw.com/info/ sec504.accoms.mods.pdf
Specially-Designed Instruction	"Specially Designed Instruction" is "adapting, as appropriate to the needs of an eligible child under this part, the content, methodology or delivery of instruction (i) to address the unique needs of the child that result from the child's disability; and (ii) ensure access of the child to the general curriculum, so that the child can meet the educational standards within the jurisdiction of the public agency that apply to all children."	**IDEA** (34 CFR Sec. 300.39(b)(3)
Co-Teaching	Co-teaching is the practice of pairing teachers together in a classroom to share the responsibilities of planning, instructing, and assessing students. In a co-teaching setting, the teachers are considered equally responsible and accountable for the classroom. Co-teaching is often implemented with general and special education teachers paired together as part of an initiative to create a more inclusive classroom.	**CAST** http://castpublishing.org/introduction-co-teaching-inclusion/
Collaborative Consultation Model	Collaborative Consultation is a special education service option in which special and general educators demonstrate on-going collaboration and decision-making regarding the instructional needs of students with disabilities through pooled resources and joint accountability. Most often, the general education teachers are responsible for content expertise and the special education teachers adapt that content for	**Collaborative Consultation to Promote Inclusion: Voices from the Classroom**

	individual learning styles and abilities based on the students' IEP then deliver support as needed. In addition, the special education teacher providing collaborative consultation monitors students' accommodations within the general education classrooms.	https://www.tandfonline.com/doi/abs/10.1080/13603116.2011.602535

These classroom visits were not intended nor conducted for the purpose of supervision or assessment of teachers' skills or competency; the process was designed to reflect a protocol that is informed by Clinical Supervision Model.[43] The Clinical Supervision Model mandates meeting with the teacher prior to observing a lesson and then conduct a follow-up meeting. In this case, there was a voluntary post-visit teacher discussion for the purposes of assuring accurate impressions, clarify information for accuracy and/or provide additional information. However, it must be noted it was the recommendation of the PCG that a pre-visit and post-visit discussion with the classroom teachers be conducted. However, the district informed PCG that the pre-visit could not occur due to scheduling constraints; and that post-visit interviews/discussions with teachers would need to be on a volunteer basis.

Classroom visitations occurred in the following manner:

1. The schedule of classroom visits was established by the individual building-level leadership that reflected an assortment of grade level, subject areas and placement designations in which students with IEPs were placed. The intent was to assure that all placement settings and models of special education instruction were represented and could be categorized.

2. A PCG consultant (total of three) was assigned to each school and all PCG consultants used the same protocol to guide the visit.

3. Classroom visits were conducted as expected, however, it should be noted that each school had an individual approach to sampling and scheduling, which reflected the specific attributes of each school. The results of these visits yielded a set of qualitative data that was sufficient to yield agreement and identify themes that informed recommendations.

The framework and associated protocols represented in this review, reflects a mixed methods approach that relies primarily on qualitative data collection from qualified and experienced professionals in the field of special education. It is augmented by several convergent approaches to measuring the observable data using categorization and where appropriate Likert scale measures.[44] The classroom visit protocol guided PCG to identify the presence and examples of specific core general education practices; and special education / inclusive practices and supports. PCG consultants documented their visit and associated impressions following elements of the protocol and the resulting notes were categorized within the classroom types. Following this process, themes were identified from the aggregated data (PCG consultant's notes) to yield key insights and patterns regarding the presence and use of the noted classroom features and practices. In addition, select data was further reviewed in a quantitative manner using Likert scales when impressions were grossly incongruent, however, the majority of the data was within a reasonable range of agreement.[45]

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[43] Goldhammer, R. (1969). Clinical supervision: Special methods for the supervision of teachers (1st ed.) New Journal of Education and Practice www.iiste.org ISSN 2222-1735 (Paper) ISSN 2222-288X (Online) Vol.8, No.21, 2017 167 York: Holt, Rinehart & Winston.

[44] Likert, Rensis (1932). "A Technique for the Measurement of Attitudes". Archives of Psychology 140: 1–55.

[45] Id.

Physical School and Classroom Environment

There was total agreement among the PCG consultants that the culture and climate of each of the Chappaqua schools visited were clean, secure, well-designed and appointed, and reflected a welcoming student friendly atmosphere. Nearly every school had progressive designs and instructional areas such as Global Learning Centers; designated STEAM Instructional Labs; dedicated rooms for teachers' aides; and multi-purpose rooms. Nearly all the classrooms were spatial, well- appointed with adjustable or alternate seating, and well-equipped with technology.

Teachers and Professional Staff

Consistent across all the schools in Chappaqua Center School District, there is an extremely dedicated, well-educated, and talented faculty. PCG consistently documented effective, creative and progressive instruction across the variety of grade levels and subject areas. There was an agreement that most of the students were highly engaged, well-organized, curious, and involved, which is an artifact of a well-organized and supported classroom. In regard to classified students, both the general and special education teachers, work together and share accountability for all the students with IEPs. However, it was clear that there was a level of frustration in their efforts to appropriately and adequately meet the needs of all the students with IEPs and in particular those that are well below grade level.

Universal Design for Learning

Universal Design for Learning (UDL) is a framework to improve and optimize the needs of varied learners and represents an evidence-based practice in general education. Therefore, UDL strategies are not considered to be unique to special education or specially designed instructional practice. However, there is no doubt that implementation of UDL principles enables students with IEPs to more easily progress in the general education setting. In addition, the deliberate use of differentiating what is taught, how it is taught, and how learning is assessed according to students' readiness, learning profile, and interests, creates a more personalized or tailored approach to learning and yields progress.[46] UDL and differentiated instruction (DI) are considered critical practices to apply in the inclusive classroom setting.

UDL provides an approach based on neuroscience and cognitive science and a framework for front-loading instructional design to reach a wider range of learners, including students with IEPs.[47] UDL highlights a common, foundational set of practices that align with a districts' beliefs and vision and mission statements about the role of the teacher, how students learn best, and the purpose of education. In addition, UDL provides all educators a common set of understandings and language and practices for designing and implementing instruction that engages students and proactively anticipates and responds to diversity in learners. Furthermore, UDL helps educators think strategically about their current practices and provides a framework to expand their thinking about planning varied ways to engage students, present new content, and facilitate the learning process.

UDL is firmly grounded in the belief that every learner is unique and brings different strengths and weaknesses to the classroom. Traditional curricula are "one-size-fits-all," designed to meet the needs of a "typical" student. As a result, any student that falls outside this narrow category is presented with a host of barriers that impede access, participation, and progress in the general curriculum.[48] UDL can make instruction more accessible to all students when used in designing a school district's curriculum, scope and sequence, pacing, lesson plans, and assessments. There are three main learning guidelines: multiple means of engagement-the why of learning, multiple means of representation-the what of learning, and multiple means of action and expression-the how of learning.

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[46] Tomlinson, C.A. (2017). How to Differentiate Instruction in Academically Diverse Classrooms, 3rd Edition
[47] National Center on UDL. UDL Guidelines- Version 2: Research Evidence. http://www.udlcenter.org/research/researchevidence
[48] LD OnLine. http://www.ldonline.org/article/13002/

Universal Design for Learning (UDL)

Always	The rating indicates that the extent to which UDL is strongly evidenced across the engagement, action & expression; and representation.
Often	The rating indicates that the extent to which UDL is often evidenced across the engagement, action & expression; and representation.
Few	The rating indicates that the extent to which UDL is barely evidenced across the engagement, action & expression; and representation.
None	The rating indicates that elements of UDL was not observed

PCG's Overall Rating Across Elementary Schools: Few-Often
PCG's Overall Rating Across Middle – High Schools: Often

UDL is considered critical to apply in the inclusive classroom setting. Although the PCG consultants observed examples of UDL are embedded in many of the CCSD Consultant Teaching classrooms, there seems to be an understaffed special education faculty, which may eventually lead to difficulty in implementing the fidelity of the current inclusion model. The aggregated results of PCG's classroom visits reflected a variety of research-based general instructional practices and approaches, and which occurred frequently across general education classrooms. Some of these included:

- Clearly stating lesson goals

- Providing student feedback

- Questioning students to check for understanding

- Encouraging students to work together collaboratively

- Teaching students strategies in addition to content

Accommodations and Modifications in the Classroom

In a previous section of this report, PCG discussed accommodations as described within the IEP. This section describes them as seen within our classroom visits and survey responses. An accommodation is "an alteration of environment, curriculum format, or equipment that allows an individual with a disability to gain access to content and/or complete assigned tasks."[49] Accommodations are typically grouped into four categories: presentation, response, setting, and timing and scheduling. In contrast, a modification describes a change in the curriculum or expectation of mastery. A modification changes what a student is taught or expected to learn.

In the CCSD staff survey, staff were asked to agree or disagree with the following statement: "The special education/related services, accommodations, and/or modifications identified in students' IEPs are provided as written." Some 23 percent strongly agreed and 55 percent of educators agreed with the statement.

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[49] Referenced from: https://www.washington.edu/doit/what-difference-between-accommodation-and-modification-student-disability#:~:text=The%20term%20%22accommodation%22%20may%20be,a%20regular%20course%20of%20study.

Exhibit 37. Staff Survey: The special education/related services, accommodations, and/or modifications identified in students' IEPs are provided as written.
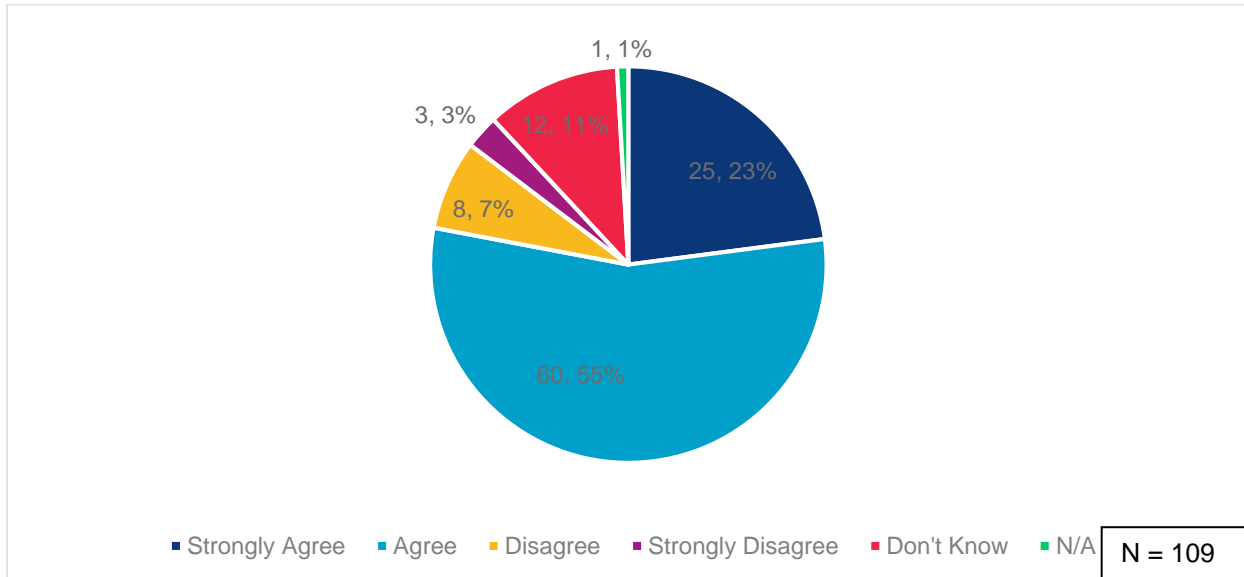
It was difficult to discern if students were provided or to what extend there was individualized modifications to curriculum content, instruction, and/or assessment. For the majority of classroom visits these accessibility features could not be documented. That said, accommodations / modification may not have been obvious to the observer. However, the fact that there are students who are more than several grade levels and with developmental delays, modifications to content and adaptation to materials must be implemented for successful and meaningful inclusion with the general education setting.

During the interviews, staff and administrators stated that the intensive modifications required by some students resulted in them being instructed often by paraprofessionals or special education teachers separately in the classroom. This was also the result of insufficient time for students to receive learning center, resource support or the special education teacher being in the class for a limited amount of time.

Integrated Co-Teaching

The use of a co-teaching model that involves a general education teacher and special education teacher providing inclusive education opportunities for students with disabilities continues to gain popularity across the U.S. Co-taught classrooms offer one way in which the expectations of inclusive education can be met for students with and without disabilities. These approaches vary in their collaborative nature, ranging from methods in which one teacher plays a more primary role in planning and instruction than the other, to more collaborative, team-based approaches in which there is shared responsibility for planning and instruction. Friend and Cook (2012) describe six approaches to co-teaching that represent the essence of what occurs in co-taught classes. These approaches include one teach-one assist, one teach-one observe, station teaching, parallel teaching, alternative teaching, and team teaching. These models of co-teaching are hierarchical and represent the least to most collaborative approaches.

The NY State Special Education Regulations defines ICT as "the provision of specially designed instruction and academic instruction provided to a group of students with disabilities and nondisabled students".[50] This is further delineated as two teachers (special and general education) are delivering instruction across a menu of co-teaching models.

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[50] Regulations of the Commissioner of Education Part 200.6 (g) (1-3)

Interview and classroom visit data indicated that the district no longer prescribes to the use of ***Integrated Co-Teaching*** (ICT) model of special education. There are several examples of integrated co-teaching primarily in the high school. The journalism class that was observed appeared to be using a co-teaching model; and it was reported that there is a unique co-taught classroom that combines the efforts of social studies and special education teachers. However, the district does not subscribe to the traditional model of two teachers (general and special education) full time or the majority of the time in one room. There was no explanation as to why the district abandoned this approach but it appears that it was replaced by a collaborative consultation model.

Consultant Teacher (CT) Model

The Consultant Teacher (CT) model employs the support of a special education teacher that "pushes in" the general education classroom to support his/her students with disabilities; and will consult with the general education teacher outside the classroom. Within the elementary schools the Consultant Teacher appears to be the primary / nearly sole approach to educating students with disabilities. The CT model is often augmented by the "Reading as a Related Service;" and AIS (during the school day). However, in the middle school and high school the CT model is often combined with a Learning Support class which may or may not be instructed by the same teacher. Classroom visits revealed that the Learning Support Classroom was a supplemental instructional period in which students were pre/post taught content from the general education classroom. In addition, students were assisted in organization and clarity regarding assignments. Another feature of the way the district implements the CT model is the use of para-educators when teachers are not in the class.

Teachers consistently reported that these limited range of service delivery services, often were not robust enough for some of the students with disabilities and that the limited number of hours (maximum of 2 hours per day) was not sufficient for many of the students. During a interviews and focus groups, the rationale for this 2 hour maximum of CT services was the result of the schedule, specifically at the middle school. Others shared that it was the result of their Collective Bargaining Agreement.

In addition, it appears that the CT model is implemented differently throughout the schools and sometimes inconsistent within schools. There were several instances observed or reported of student needing to be being removed for individual direct instruction which appears appropriate.

As stated earlier, CCSD identifies its model of special education as "fully inclusive" and seems to define that term as ALL students are educated 100 percent of the time in the general education setting. The primary approach or inclusive model is a Teacher Consultant Model in which a special education teacher co-teaches in the general education classroom up to 2 hours per day depending on the students' IEP. This results in a student either having no additional special education support when the teacher consultant is not present; having a dedicated teacher's aide within the classroom when the teacher consultant is not present; or having a one-to-one teachers' aide all the time. Faculty report that the district limits the CT support for any student to 2 hours per day; although the NY State Regulations permits up to full-time (direct and indirect) and federal law requires services to meet the student needs.[51]

The special education teachers are the case managers with a specific caseload of students that may cross grade levels and/or content areas. Both the general and special education teachers, who are engaged in this Teacher Consultant model, provide direct, and what seems to appear indirect Consultant Teacher services. Common meeting times are scheduled for many of these teaching pairs CT special educators and general education teachers receive an average of one 30-45 minute collaborative period within a 6-day cycle. It would appear that any indirect CT services are provided during this common planning period.

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[51] Regulations of the Commissioner of Education Part 200. 1(m)(1-2)

Many middle and high school students are provided additional support in Learning Center classrooms (Supplemental Instruction); however, these are not available in the elementary grades. The Learning Center is a district-specific term; however, it seems that it meets the definition under the NY State Regulations as a Resource Room and some of the schools refer to it as a Resource Room.[52] In addition, it is reported that students with IEPs especially in the elementary grades (where there are no Learning Center Classrooms access AIS services within the school day; and/or are provided Reading as a Related Service in which the times and days are indicated on their IEP.

It was difficult to discern if there are criterion that are used to determine the amount and intensity of special education support such as Learning Centers, AIS (which is identified in the IEP), Teacher Consultant, One to One Teaching Assistant, a Teacher Assistant for the classroom, or Reading as a Related Service.

PCG observed students with more intensive learning needs that appeared lost or could not maintain attention to the level of instruction, the content modifications and professional instruction that they seemed to need. That said, many of the teachers reported that although there are students that do well within the district's model of inclusive education supports; there are those that are significantly below grade level that are not getting the amount of attention and direct instruction as they need. The teachers are very concerned that these students with more intensive learning needs are not progressing at a rate that they could be if more direct instruction was provided. There were professional staff that reported that if they pull a student out of the CT class to either pre/post teach, they are in violation of the students IEP and/or the district's model. Administrators and teachers expressed concern that the CCSD's single model of inclusion does not meet the needs of some students During 3 out of 6 central office interviews; 6 out of 8 building administrator interviews; and all file review focus groups, this was raised

Special education staff and building administrators expressed frustration that they may not recommend any services in excess of the district limits, regardless of the student's needs. Specifically, during 1 central office interviews; 6 out of 8 building administrator interviews; and more than half the file review focus groups, this issue was raised. It was also raised during many teacher post-visit conversations.

It is important to note that a district "must not make placement decisions based on its needs or available resources, including budgetary considerations and the ability of the public agency to hire and recruit qualified staff".[53] The district must be able to determine on an individual basis the needs and services for each student with an IEP.

The Consultant Teacher (CT) model for special education requires a specific planning and a paradigm change for administrators, teachers, parents, and students. PCG posits the following are practices that are necessary to the successful implementation of CT:

Faculty, parent, and student training. The provision of professional development for faculty, parents and students is critical to the success of a newly established CT model. Parents and students will need a clear and concise training on what the CT Model is; the benefits to the students; and procedures of implementation. Teachers will need more intensive professional development that includes skills of collaboration and co-teaching; eligibility factors for individual students; consultative skills; shared decision-making and problem solving. In addition, an administrator should meet bi-monthly with the teachers to discern if there are any issues or what progress is being made by students. Lastly, those responsible for developing Individual Education Programs should be made be involved in a school-wide eligibility process.

Student eligibility guidelines for CT. Special education regulations require that the students' Individual Education Program (IEP) teams design the appropriate way services will be provided and a continuum of placements must be available. Therefore, IEP teams must identify a CT model through

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[52] Regulations of the Commissioner of Education Part 200.1(rr)
[53] 71 Fed. Reg. 46587 August 14th, 2006

a systematic eligibility process that is linked to the student's needs. Figure 1 reflects a set of guidelines that may be used to yield the appropriateness of providing special education services within this advanced CT approach. Conducting a systematic process that focuses on the appropriateness of CT as a vehicle for each student will assure that students will be provided with the right combination of services and appropriate support.

Collaborative Teaming. To create the most effective learning and social environment possible for each student within this special educational service model, it is vital that there is a high level of collaborative skills exercised between general and special education teachers. The CT model mandates that all the teachers involved commit to achieving positive interdependence by agreeing to both pool and partition their resources and to operate from a foundation of shared values. [54]Therefore, teachers need to establish clear roles and responsibilities; agree on approaches to instruction and behavior; decide on a common desired classroom climate; articulate an agreed approach to conflict, disagreement, and problem-solving; and document their shared program development initiatives.[55] A collaborative team approach is vital to the success of the CT model, and it is critical that both special and general education teachers understand their own unique roles and expectations within the CT model.

Clearly Defined Roles. Typically, the general education teacher assumes the role of the content expert, who clearly defines content outcomes. The general education teacher is the teacher of record and assures progress in all content areas (e.g. language arts, mathematics, etc.). The special education teacher provides specific strategies for instruction and maintains the fidelity of the implementation of all accommodations required by the student (e.g. additional time, note-taking, etc.). Special educators may also identify students who require changes to curriculum content, instruction, assessment processes and academic materials and provide these modifications. At times, the special educator may infuse support or remediation for students who present with more significant skill deficits in social/behavioral and/or academic skills. Both the general education and special education teachers jointly ensure that students are meeting their IEP goals and making adequate progress.

Common Planning Time. If the success of CT is dependent on collaboration, and each teacher having clearly defined roles then the teachers require shared planning time. Therefore, school administrators should consider the development of a master schedule that includes grade-level common planning time for teachers. The educational literature is replete with evidence of the need for teachers especially those in the upper grades to have time to collaborate for the purposes of meeting the academic needs of a diverse student body.[56] Within the CT model, Common Planning Time (CTP) is a critical component and may be the single most important factor for success.[57] A CPT Meeting format should be designed and diligently maintained to provide a data source to reference or aggregate for the purposes of assuring that the time is spent effectively and efficiently.

Data Collection and Analysis. In order to assure that each student is supported appropriately, it is critical that the special and general education teachers maintain accurate performance and outcome data. The CT special educator should document the daily use of the time and type of services/support that is provided to each student. Such documentation is especially essential within the CT approach, since the model is dependent on the flexible nature of the provision of support and services, students

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[54] Janney, R., King-Sear, M.E., Snell, M., (2015) Collaborative Teaming

[55] Pancsofar & Petroff (2016) Teachers' Experiences with Co-Teaching as a Model for Inclusive Education, International Journal of Inclusive Education, v20 n10 p1043-1053 2016

[56] Hunter, W., Jasper, A.D., Williamson, R.L., (2014). Utilizing middle school common planning time to support inclusive environments. Intervention in School and Clinic. 50(2) 114- 120. Sage Publishing.

[57] Pratt, S.., Imbody, S., Wolf, L.,Patterson,A. (2017). Co-planning in co-teaching: A practical solution. Intervention in School & Clinic. Mar2017, Vol. 52 Issue 4, p243-249. 7p.

will require different support and services dependent on the content, activity, and instruction efforts. Figure 3 presents a format to document these services and supports.

However, it must be noted that for any data system to be valued, its analysis must inform practice. Analyzing the type and frequency of support for each student may further inform the team that the appropriate levels of services are being provided or if something needs to change. For example, if a student is not progressing and the data indicate that the special educator is only providing in-class support, this may be an indication that the students requires more pre/post instructional attention. In this case, the special educator may want to pull the student out during non-instructional periods to provide direct instruction in preparation for an upcoming unit of study. Based on information gathered from interviews and focus groups, a challenge with pulling out students in the middle school is that it occurs during their Encore classes – art, music, band, foreign language. Through interviews, focus groups, and seen during classroom visits, pulling out during these times disruptive to students. Repeatedly, teachers and administrators shared that for many students, the arts and foreign language is a critical part of the middle school experience and perhaps the most important part of these students' day.

Benefits of the Collaborative Teaching Model

There are many potential benefits of CT for students, teachers, and school leaders. The CT model facilitates the use of special education strategies for a broader range of students and can support fewer referrals for segregated special education placements. In a study conducted by Eisenman, Pleet, Wandry & McGinley (2011), a newly established vocation school implemented a CT model and abandoned the use of resource rooms or self-contained classrooms.[58] As a result, across the two-year longitudinal study, only one student transferred to another school that had separate educational program placements (e.g. self-contained classrooms). This study demonstrated that a wide range of students with disabilities could be appropriately educated within general education curriculum and settings. The CT model also supported students increased access to general education classes and curriculum. In addition, through this level of collaboration, general and special education teachers have the opportunity to create classrooms that support attributes of Universal Design for Learning, thereby, making changes that will benefit a wider group of students with and without disabilities.[59]

Successful implementation of CT requires a culture of collaboration, acceptance and full participation. The model of consultative collaboration illustrated above, requires that the host school adopt a view that students with disabilities belong in their general education classrooms. Therefore, in addition to focusing efforts on those involved, this approach to inclusive education must include the entire school community. This CT model should be developed and implemented in coordination and context of the other school-wide systems such as School-Wide Behavior Support, and/or Response to Intervention / MTSS.

In regard to those directly involved in CT, teachers and administrators should maintain some form of reflective practice that monitors and responds appropriately to systems' challenges. This can be in the form of a professional learning community or merely, a bi-monthly item on common planning time agenda.   In addition, teachers should implement a system of continuous progress monitoring to assure that students with disabilities are making the expected levels of achievement. Progress monitoring can provide targets for modifying the host of services and support that are possible under the CT model.

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[58] Eisenman, L.T., Pleet, A.M., Wandry, D., McGinley, V., (2011). Voices of special education teachers in an inclusive high school: Redefining responsibilities. Remedial and Special Education 32(2) 91-104. Sage Publishing.

[59] McGuire, J. M., Scott, S. S., and Shaw, S. F. (2006). Universal design and its applications in educational environments. Remedial and Special Education, 27(3), 166-175.; Thousand, J.S., Villa, R.A., Nevin A.I. (2007). Differentiating instruction, collaborative planning, and teaching universally designed learning. Corwin Press, Thousand Oaks, CA.

In the CCSD staff survey, staff were asked to agree or disagree with the following statement: "CCSD has established standards for delivering co-teaching/collaborative instruction." Some 11 percent strongly agreed and 22 percent of educators agreed with that statement.

Exhibit 38. Staff Survey: CCSD has established standards for delivering co-teaching/collaborative instruction.

Legend: ■ Strongly Agree ■ Agree ■ Disagree ■ Strongly Disagree ■ Don't Know ■ N/A   N = 109
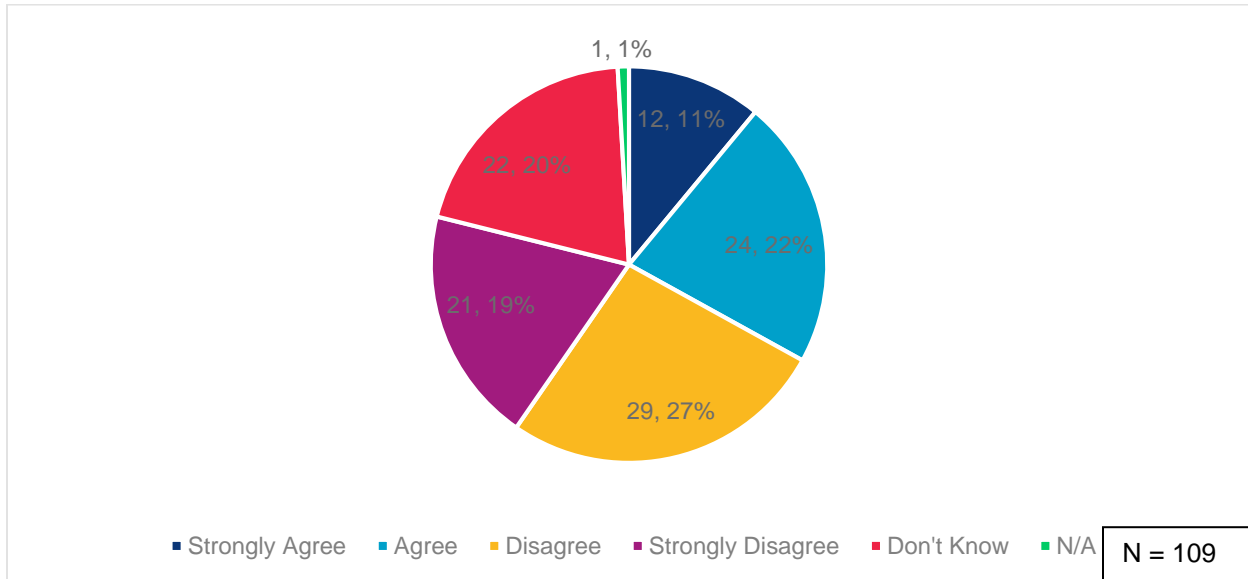
Differentiated Instruction and Inclusive Practices

Inclusive instruction first became a popular concept in the 1980s and was used to distinguish special education placement in the general education classroom with appropriate supports from the prior concept of "mainstreaming."[60] The practice of mainstreaming involved students with disabilities in general education classrooms without the supports they needed to be successful.[61] It is important to note that the mainstreaming term was used shortly after the special education law was first implemented (1978) and special education was viewed as the "place" where students learned. Through the reauthorizations of IDEA and as special education expertise grew, special education is no longer considered to be a place of instruction but rather a constellation of instructional modalities, including those that are specialized. The concept of inclusive instruction has grown to the idea of supporting the learning of students with IEPs along with their typical peers through UDL, differentiated instruction, collaborative teaching, and co-teaching.

Differentiated Instruction (DI) means tailoring instruction to meet individual needs. Whether teachers differentiate content, process, products, or the learning environment, the use of ongoing assessment and flexible grouping makes this a successful instructional tool. The deliberate use of differentiating what is taught, how it is taught, and how learning is assessed according to students' readiness, learning profile, and interests, creates a more personalized or tailored approach to learning and yields progress.[62]

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[60] See: https://www.njcie.org/inclusion
[61] Id.
[62] Tomlinson, C.A. (2017).   How to Differentiate Instruction in Academically Diverse Classrooms, 3rd Edition

Use of Differentiation

G	Great	*This rating indicates that the extent to which differentiation and evidence-based instructional strategies is abundantly evident and well-integrated within instruction*
G	Moderate	*This rating indicates that the extent to which differentiation and evidence-based instructional strategies is evident and integrated within instruction*
S	Some	*This rating indicates that the extent to which differentiation and evidence-based instructional strategies is somewhat evident within instruction*
N	None	*This rating indicates differentiation and evidence-based instructional strategies could not be identified.*

PCG's Overall Rating Across Elementary Schools: Moderate

PCG's Overall Rating Across Middle - High Schools: Some-Moderate

In addition to yielding information regarding the presence and examples of specific core general education and special education practices and inclusive education approaches/supports, PCG inquired as to the number of staff and students with IEPs within each classroom.

Assistive Technology

In IDEA 2004, assistive technology (AT) was defined as "any item, piece of equipment or product system, whether acquired commercially off the shelf, modified, or customized, that is used to increase, maintain, or improve the functional capabilities of children with disabilities" (20 U.S.C. 1401(1)). In addition, IDEA defines an assistive technology service as "any service that directly assists a child with a disability in the selection, acquisition, and use of an assistive technology device. The term includes:

- The evaluation of the needs of a child with a disability, including a functional evaluation of the child in the child's customary environment;

- Purchasing, leasing, or otherwise providing for the acquisition of assistive technology devices for children with disabilities;

- Selecting, designing, fitting, customizing, adapting, applying, retaining, repairing, or replacing assistive technology devices;

- Coordinating and using other therapies, interventions, or services with assistive technology devices, such as those associated with existing education and rehabilitation plans and programs;

- Training or technical assistance for a child with a disability or, if appropriate, that child's family; and

- Training or technical assistance for professionals (including individuals or rehabilitation services), employers, or other individuals who provide services to employ, or are otherwise substantially involved in the major life functions of, children with disabilities."[63]

According to district administration: "For the most part, our assistive technology evaluations and consultations are completed by outside providers. Most are completed by Westchester Institute for Human Development (WIHD) [and] some are completed by BOCES." District administration also shared that its technology department staff primarily support hardware and software needs. District administration shared that for students requiring a more individualized device or software, the training tends to come as part of the consultations with WIHD or BOCES. When an evaluation is completed and the device and/or software

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[63] 20 U.S.C. 1401(2)

has been approved by the CSE, district administration shared that the recommendation is typically for consultations with staff, student, and parent as needed.

During classroom visits, PCG staff observed the use of dedicated speech-generating devices for non-verbal students. PCG staff also observed the use of switch devices for non-verbal students. In both cases, according to the teachers, the devices were supported by a speech language pathologist. PCG also observed the use of FM systems.

During file review focus groups, it was discussed that although many students have speech generating devices, there is a lack of clarity around the personnel responsible for servicing the device. Although it was clear that the speech pathologist had responsibility to support the device in a manner consistent with the students' speech and language needs, in a few instances, speech therapists felt they were left on their own when servicing a device or providing training on the technical aspects of the device to parents and staff. This was raised during all file review focus groups in which IEPs were discussed where speech generating devices were listed within

Reviews of these specific files, it was also shared that parent training for communication devices needed to be better implemented. In particular, concerns were raised about inconsistent use of devices between home and school and a lack of parental training specific to the continuation of the device at home.

Specialized Behavior Support for Students with Disabilities

With the passage of the IDEA 2004 and its amendments, Congress recognized schools must be inclusive of all students and use evidence-based approaches to support the behavioral needs of students with disabilities. According to the Office of Special Education Technical Assistance Center on Positive Behavioral Interventions and Supports under the U.S. Department of Education, Positive Behavioral Interventions and Supports (PBIS) is the only approach specifically mentioned in the law for preventing exclusion, improving educational outcomes, and addressing the behavior support needs of students with disabilities. In addition to PBIS, the law states education for students with disabilities can be more effective when schools[64]:

- Provide incentives for whole-school approaches;
- Implement scientifically based early reading programs; and
- Use early intervention services to stop labeling students as 'disabled' in order to address their learning and behavioral needs.[65]

Tiered Positive Behavior Support Model for Students with Disabilities

Children and youth with disabilities benefit from free, appropriate, public education designed to meet their unique needs. At the same time, students with disabilities are served best when their general and specialized supports are integrated into the larger school-wide framework.

Tier 1: Students with disabilities benefit from Tier 1 supports by including the school-wide language for expectations in their IEP. Adopting these expectations and applying them during specialized instruction is important, too. School personnel teach students behavioral expectations by using the core PBIS lessons and utilizing the school-wide acknowledgment system for appropriate behaviors. Within classrooms, students with and without disabilities benefit from frequent opportunities to respond, positive acknowledgments, and reminders such as prompts and pre-corrections.

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[64] OSEP Technical Assistance Center on Positive Behavioral Interventions and Supports (2021). Positive Behavioral Interventions & Supports. See: https://www.pbis.org/topics/disability.
[65] Id.

Tier 2: Targeted interventions at this tier are more intensive than those given at the universal tier 1 level. Students may receive Tier 2 targeted interventions in addition to Tier 1 supports. Students with disabilities may benefit from Tier 2 supports the same as any other student in the school. However, Tier 2 supports should supplement and not reduce or replace services outlined in the student's IEP.

Tier 3: For those few students who engage in chronic, severe behaviors and who have not responded to Tier 1 and Tier 2 supports, Tier 3 interventions may be appropriate. The Tier 3 framework includes the design of Behavior Intervention Plans (BIP) with interventions driven by Functional Behavioral Assessments (FBA). Teams may apply a person-centered or wraparound process. These processes place student and family needs at the center of the support provided for students with complex needs. Students with disabilities access Tier 3 interventions in two ways: (1) As part of typical school practices or (2) as required through the IEP.[66]

According to data gathered from interviews and focus groups with administrators, as well as information gathered during file review focus groups, CCSD would benefit from increased focus on providing appropriate support to students with behavioral disabilities.

In the CCSD staff survey, staff were asked to agree or disagree with the following statement: "There is a well-articulated approach in my school(s) to address the behavior needs of students with disabilities." Some 5 percent strongly agreed and 34 percent of educators agreed.

Exhibit 39. Staff Survey: There is a well-articulated approach in my school(s) to address the positive behavior needs of students with disabilities.

Legend: ■ Strongly Agree ■ Agree ■ Disagree ■ Strongly Disagree ■ Don't Know ■ N/A | N = 109
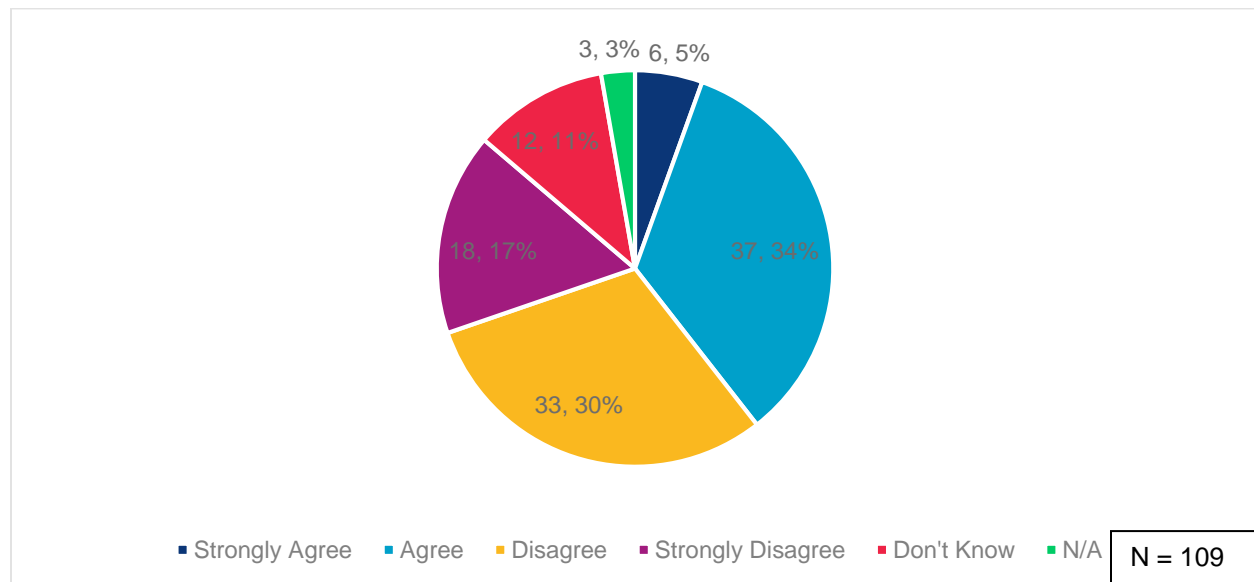
Protocols for Conducting and Implementing Functional Behavioral Assessments and Behavioral Intervention Plans

Under IDEA, if behavior impedes a student's learning or that of others, the IEP team must consider the use of positive behavioral interventions and supports to address that behavior. In such circumstances, a Functional Behavior Assessment (FBA) is used to assess the targeted behavior, antecedent circumstances that trigger the behavior, and helps the team to design the BIP. An FBA and BIP must be in place for

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[66] OSEP Technical Assistance Center on Positive Behavioral Interventions and Supports (2021). Positive Behavioral Interventions & Supports. See: https://www.pbis.org/topics/disability.

students with IEPs who are suspended for more than 10 days for behavior that is manifested by their disability.

The following items are typically included in a BIP:

- Target behavior(s);

- Documentation of prior interventions and student response;

- Description of positive supports/interventions to be implemented, including the conditions under which the supports/interventions will be implemented;

- Procedures for data collection to evaluate the effectiveness of the interventions;

- Conditions under which the supports/interventions will be changed;

- Conditions under which the supports/interventions will be terminated; and

- Parental involvement.

According to interviews and focus groups with CCSD administration, the following information was shared around the provision of behavioral support for students with disabilities:

- When a BIP was completed it typically was conducted by the psychologist and not by or with the support of a behaviorist (e.g. Board Certified Behavior Analyst). For some students with behavioral issues, there was no BIP prepared as they believed the program addressed behavioral issues.

- The district contracts out for some behavioral services but does not have any behavioral specialists available to teachers and teams.

Based on information gathered from file review focus groups and classroom visits, the district does not adhere to any specific programs or philosophy (e.g. Applied Behavioral Analysis or other specific programs) for addressing the needs of students with autism or other significant behavioral issues. Such programs would typically be operated under the support or supervision of a behaviorist (e.g. Board Certified Behavior Analyst). The district leverages its psychologists to conduct Functional Behavioral Assessments (FBA) and Behavioral Intervention Plans (BIP). The district sometimes contracts with a Board-Certified Behavior Analyst (BCBA) for FBAs and BIPs. However, during file review focus groups, in several instances there were students which had noted behavioral challenges and staff engaging in behavioral interventions without an FBA or BIP. Although working to support the child's behavioral issues, and sometimes working with a school psychologist in doing so, there were instances (particularly among students with Autism) that the behavioral interventions may not have been consistent. This was raised during one central office interview and 6 out of 12 file review focus groups.

In the CCSD staff survey, staff were asked to agree or disagree with the following statement: "Students with IEPs have adequate services in place to manage challenging behavior in the classroom." Some 5 percent strongly agreed and 27 percent of educators agreed with that statement.

Exhibit 40. Staff Survey: Students with IEPs have adequate services in place to manage challenging behavior in the classroom.
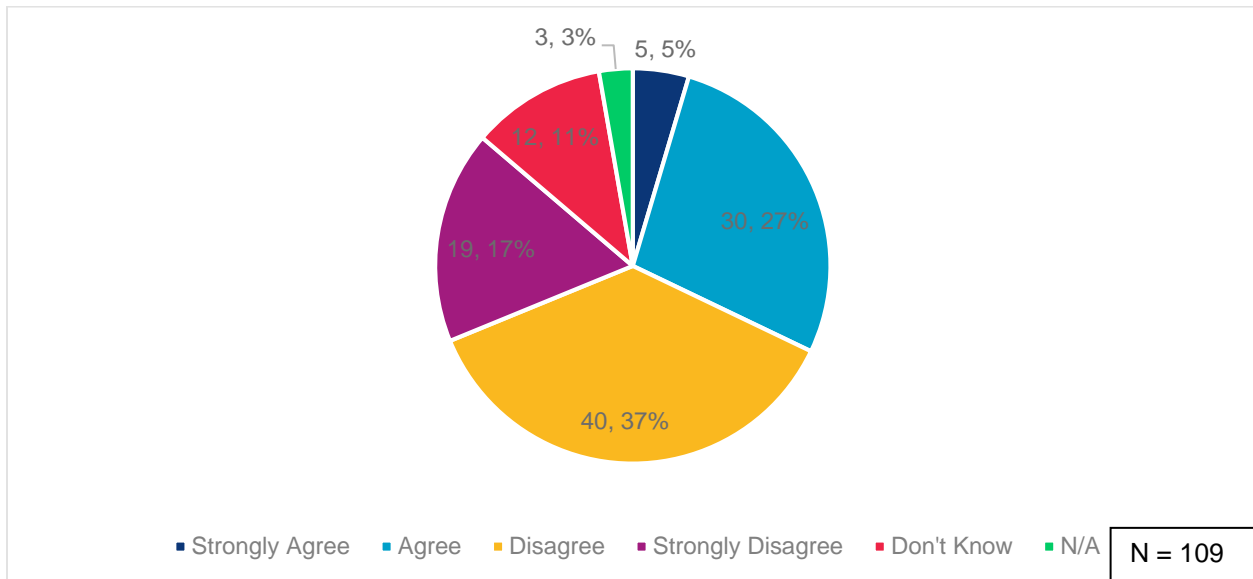
The PCG consultants noted that there was an obvious climate of collaboration and civility in all schools. There did not appear to be a school-wide system of behavior support that would influence classroom management and individual behavior challenges. Within some of the schools, recognition of the need to support the social/emotional status of students was evident from banners and posters on the walls. It was reported that there are students with Behavior Support Plans that are derived from Functional Behavior Assessment that are conducted by special education teachers in combination with other school professionals (e.g. school psychologists).

Reading as a Related Service

In CCSD, a CSE may determine that a child needs supplemental, pull-out or push-in reading support provided in a small group by a Wilson trained reading specialist. In such instances, the district offers reading as a related service. According to the district website: "Reading as a Related Service is specially designed individualized or group instruction provided to meet the student's needs in the area of reading as recommended in the Individualized Education Program (IEP). The service may be provided in the classroom or in another educational setting structured to meet the individual needs of the student(s)." In most Reading as a Related Service sessions, the Wilson Reading Program is adhered to.

Parents and teachers alike spoke highly of Reading as a Related Service. Many parents spoke to the fact that in the past, the district did not want to address the needs of students who may be diagnosed as Dyslexic, stating that the district did not want to use that word nor provide unique supports for Dyslexic students. However, these same parents also spoke to the fact that they were pleased with the district's Reading as a Related Service programming.

Transition Activities

Requirements of Transition at Age 15

According to the Pacer Center, "a truly successful transition process is the result of comprehensive team planning that is driven by the dreams, desires and abilities of youth. A transition plan provides the basic structure for preparing an individual to live, work and play in the community, as fully and independently as possible."[76]

In CCSD, as identified through file review focus groups, teachers and administrators alike shared that they believe the transition statements could use additional information (e.g. quantitative data from career inventories, assessments, and goals created based on data). Based on information gathered from the focus groups, this may be attributable to the fact that most students in CCSD with an IEP are college-bound and so the Transition section of the IEP is not be as applicable. For students with more significant disabilities, there was discussion that the statements were missing information, specifically about liaising with outside agencies (and goals were often not in the form of SMART goals).During file review focus groups, it was observed that specific information about liaising with outside agencies (e.g. New York Office for Persons with Developmental Disabilities) was sometimes captured in the minutes; at the same time, it was widely acknowledged by participants that the minutes are not part of the IEP. This was raised during 2 out of 6 central office administrator interviews; and in two of the three interviews at schools where Transition services occur. It was raised in all file review focus groups with IEPs were the district was liaising with outside agencies for Transition services.

Based on file review focus groups, for college-bound students with IEPs, school counselors and CSE members discuss student academic performance and growth; participation in and performance on local and state assessments; other measures of success and engagement (i.e. attendance, discipline, extracurricular, athletic, and student-life participation); Regents/local graduation rates of students with disabilities; overall preparedness of students for college, and career or post-graduation plans.

In the 2019-20 school year, CCSD contracted with the ARC of Westchester to support the transition needs of students primarily in its Pathways Program. The ARC of Westchester is responsible for the following:

- OPWDD eligibility and application process
- Adult Day Service Systems (available programs, determining the appropriate program options)
- Prepare for how the systems are working during the COVID-19 Pandemic
- Steps to Employment
- How to Prepare for Employment
- Following a Schedule and Creating Task Analysis
- Skill Development in Communication and Professionalism
- Community Traveling/Transportation
- Motivation and Mindset
- Post-secondary and College Based Transition Programs
- Services Available While in High School
- Money Management
- Internship and Volunteer Development

The ARC of Westchester provides monthly information sessions that provide this information, either on site or virtually, and each session is one hour in length. The Special Education Director has begun working with the Horace Greeley High School Counseling Department Chair to further clarify the intersection between the roles of the ARC services and the roles of the school counselor in being knowledgeable and subsequently supporting these Transition needs. However, these items were often not identified in student IEPs

Leveraging Data for Transition Goals

As discussed in almost all file review focus groups, quantitative data about career preferences or career inventories were rarely discussed and not identified within the IEP. Participants in file review focus groups indicated that career inventories are only conducted in middle school, for all students, and are seldomly cited in the transition section of the IEP. Participants also shared that high school students with IEPs rarely participate in career inventories and these data are rarely cited in high school IEPs. At the same time, transition-age children in CCSD have access to career navigating tools and resume creating tools that can

provide and support quantitative data for students' IEPs. As part of the district's Naviance too, career assessments/inventories and resume creation tools are available for both high school students and middle school students. A sample of these tools include the following[67]:

- **Careers and Clusters I'm Thinking About**: View the careers and clusters that students can add to their favorites.
- **Career Cluster Finder**: Learn what career clusters may be a good match for students based on activities that interest you, personal qualities that you have, and subjects that you enjoy.
- **Do What You Are**: This assessment uses personality types to suggest careers and clusters that might be a good match.
- **Career Key**: Students learn about and view careers associated with students Holland interest codes.
- **Career Interest Profiler**: A career interest assessment that will display students' Holland Code matches.
- **Career Assessments**: Assessments that can tell students more about themselves and their career interests.

Post-Secondary Transition: CCSD Pathways Program

Transition and Post-Secondary Programs for students with intellectual and developmental disabilities (ages 18-21) have long been offered by school districts across the country. In addition, as transition planning for students with disabilities begin between the ages of 14-16 (depending on the state), educational programs have augmented these students' core curriculum instruction with transition-based educational opportunities. CCSD offers a program / course of study entitled the Pathways Program. This program is attended by students with various disabilities to include intellectual disabilities, autism, and other developmental disabilities. The classroom observation revealed a well-equipped classroom with adjacent life skills laboratories (kitchen facilities; apartment-like space, etc.). Approximately 9 Students from ages 14-21 attend the program and are placed because of their IEP Committee recommendations. There is one special education teacher with 3-4 teaching assistance for this program.

The program utilizes the Unique Learning Curriculum which is augmented by district-specific content. ULC is an industry standard curriculum that is used within many transition and post-secondary programs. Many of the students leave the district at 21 years old and transition to day-habilitation programs supported by New York Office for Persons with Developmental Disabilities (OPWDD) such as Ramapo Program. The two observations included one class session with the teacher; and one class session with the teaching assistance. The instruction was primarily personalized and used computer-assisted programs. However, it was reported that there is a community-based component to Pathways, however, little information was provided, mostly due to time and parameters of observation.

Lastly, the Pathways Program incorporates opportunities for some students to participate in general education high school electives such as STEAM. In addition, some students attend the local BOCES programs, if it meets their needs and skills according to the IEP committee.

CCSD Graduation Rates for Students with IEPs Compared to General Education Rates

Based on data provided by CCSD, over the past four years, CCSD's graduation rate increased from 77.8 percent to 90.5 percent. Its general education graduation rate has increased from 98.5 percent to 100 percent. Over the past four years, no students with IEPs have dropped out of school.

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[67] Id.

Exhibit 41. CCSD Graduation Rates for Students with IEPs Compared to General Education Rates[68]

	Special Education Totals	Special Education Rate	General Education Totals	General Education Rate
2020-21	38/42	90.5 percent	267/267	100 percent
2019-20	22/25	88 percent	314/314	100 percent
2018-19	28/35	80 percent	261/264	98.9 percent

CCSD Senior College Matriculation Rate for Students with IEPs

The Horace Greeley High School's rate of students with disabilities who attend college is significant. However, over the past four years it has fluctuated with a low of 59 percent in the 2018-19 school year to a high of 90 percent in the 2020-21 school year. Nevertheless, this is well above the national average of high school students with disabilities enrolling into an undergraduate school at 19.4 percent.[69]

Between 2018 and 2020, the percentage of CCSD students with IEPs graduating from high school in four years was above the overall statewide graduation rate.[70]

Exhibit 42. College Matriculation Rate of HGHS Seniors with IEPs

School Year	Number of students with IEPs attending college out of seniors and post graduate students with IEPs	Rate of seniors and post-graduate with IEPs going to college	Of students with IEPs admitted to college, average Number of Applications Submitted
2020-21	35 out of 39	90%	12
2019-20	19 out of 27	70%	12
2018-19	21 out of 36	59%	11
2017-18	34 out of 41	83%	10
2016-17	37 out of 42	88%	12

Student Achievement Data for Students with IEPs

According to district administration, it uses several points of data to assess students: teacher devised assessments; reading assessments such as Fountas and Pinnell; NWEA Assessments which are administered districtwide three times per year; state assessments; and Regents exams. For purposes of this review, PCG is looking specifically at state assessments and Regents Exams. It is important to note these serve as one point among many data points to determine the progress of individual students as well as cohorts of students by grade level.

PCG reviewed CCSD's Regents Exam data from the 2017-18 and 2018-19 school years. There were no state assessments for 2019-20 due to the COVID pandemic. In the 2020-21 students could choose to take

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[68] CCSD Provided Data
[69] https://nces.ed.gov/fastfacts/display.asp?id=60
[70] Graduation and drop out data obtained NYSED data

the Regents Exam; subsequently, it led to a lower than typical number participating. In particular, PCG reviewed students meeting proficiency levels (levels 3 and 4).

Exhibit 43: Percentage on Regents Exam meeting the proficiency standard in ELA performance for the last two school years

	SWDs	General Education Students
2018-19	96 percent	100 percent
2017-18	82 percent	99 percent

Between the 2017-18 and 2018-19 school years, the percent of students scoring with proficiency **increased** and the achievement gap **narrowed**.

Exhibit 44. Percentage on Regents Exam meeting the proficiency standard in Algebra performance for the 2017-18 and 2018-19 two school years.

	SWDs	General Education Students
2018-19	92 percent	100 percent
2017-18	92 percent	100 percent

Between the 2017-18 and 2018-19 school years, the percent of students scoring with proficiency **stayed the same** and the achievement gap **remained the same**.

Exhibit 45. Grade 3, Percentage Tested Proficient, ELA

	SWDs	General Education Students
2021	73 percent	89 percent
2020	*	*
2019	35 percent	92 percent
2018	29 percent	91 percent

The percent of students with disabilities scoring with proficiency has **increased markedly**. In addition, the achievement gap also **narrowed markedly**.

Exhibit 46. Grade 3, Percentage Tested Proficient, Math

	SWDs	General Education Students
2021	58 percent	86 percent
2020	*	*
2019	43 percent	88 percent
2018	21 percent	89 percent

The percent of students with disabilities scoring with proficiency has **increased markedly**. In addition, the achievement gap also **narrowed markedly**.

Exhibit 47. Grade 4, Percentage Tested Proficient, ELA

	SWDs	General Education Students
2021	68 percent	93 percent
2020	*	*
2019	38 percent	86 percent
2018	31 percent	88 percent

The percent of students with disabilities scoring with proficiency has **increased markedly**. In addition, the achievement gap also **narrowed markedly**.

Exhibit 48. Grade 4, Percentage Tested Proficient, Math

	SWDs	General Education Students
2021	39 percent	83 percent
2020	*	*
2019	35 percent	89 percent
2018	26 percent	87 percent

The percent of students with disabilities scoring with proficiency has **modestly increased**. In addition, the achievement gap has **notably narrowed**.

Exhibit 49. Grade 5, Percentage Tested Proficient, ELA

	SWDs	General Education Students
2021	36 percent	83 percent
2020	*	*
2019	18 percent	70 percent
2018	28 percent	75 percent

The percent of students with disabilities scoring with proficiency **increased**. In addition, the achievement gap has **narrowed**.

Exhibit 50. Grade 5, Percentage Tested Proficient, Math

	SWDs	General Education Students
2021	20 percent	77 percent
2020	*	*
2019	29 percent	87 percent
2018	35 percent	80 percent

The percent of students with disabilities scoring with proficiency **decreased**. In addition, the achievement gap has **widened**.

Exhibit 51. Grade 6, Percentage Tested Proficient, ELA

	SWDs	General Education Students
2021	33 percent	95 percent
2020	*	*
2019	63 percent	84 percent
2018	58 percent	91 percent

The percent of students with disabilities scoring with proficiency **notably decreased**. In addition, the achievement gap has **notably widened**.

Exhibit 52. Grade 6, Percentage Tested Proficient, Math

	SWDs	General Education Students
2021	30 percent	87 percent
2020	*	*
2019	61 percent	94 percent
2018	50 percent	92 percent

The percent of students with disabilities scoring with proficiency **notably decreased**. In addition, the achievement gap has **notably widened**.

Exhibit 53. Grade 7, Percentage Tested Proficient, ELA

	SWDs	General Education Students
2021	35 percent	79 percent
2020	*	*
2019	36 percent	81 percent
2018	23 percent	83 percent

The percent of students with disabilities scoring with proficiency has **modestly increased**. In addition, the achievement gap has **narrowed**.

Exhibit 54. Grade 7, Percentage Tested Proficient, Math

	SWDs	General Education Students
2021	15 percent	90 percent
2020	*	*
2019	52 percent	87 percent
2018	32 percent	93 percent

The percent of students with disabilities scoring with proficiency **significantly decreased**. In addition, the achievement gap **significantly widened**.

Exhibit 55. Grade 8, Percentage Tested Proficient, ELA

	SWDs	General Education Students
2021	52 percent	94 percent
2020	*	*
2019	30 percent	91 percent
2018	33 percent	85 percent

The percent of students with disabilities scoring with proficiency has **modestly increased**. In addition, the achievement gap has **narrowed**.

Exhibit 56. Grade 8, Percentage Tested Proficient, Math

	SWDs	General Education Students
2021	14 percent	78 percent
2020	*	*
2019	41 percent	92 percent
2018	36 percent	91 percent

The percent of students with disabilities scoring with proficiency **significantly decreased**. In addition, the achievement **gap widened**.

As seen in the tables above, students with disabilities as a cohort are improving in their overall scores (as proficient) and narrowing the achievement gap with general education students in Grade 3 Math and ELA; Grade 4 Math and ELA; Grade 5 ELA; Grade 7 ELA; and Grade 8 ELA. Proficiency decreased in the areas of Grade 5 Math; Grade 6 ELA and Math; Grade 7 Math and Grade 8 Math.

Yet at the same time, scores decreased and gaps widened in the following areas: Grade 5 Math; Grade 6 ELA and Math; Grade 7 Math; Grade 8 ELA.

Exhibit 57. 2021 Standardized Assessment Participation Rates, Grades 3-8 ELA, Students with Disabilities and General Education Students

	Students with Disabilities	General Education Students
Grade 3 ELA	76 percent	97 percent
Grade 4 ELA	86 percent	98 percent
Grade 5 ELA	86 percent	97 percent
Grade 6 ELA	83 percent	83 percent
Grade 7 ELA	79 percent	93 percent
Grade 8 ELA	75 percent	95 percent

Exhibit 58. 2021 Standardized Assessment Participation Rates, Grades 3-8 Math, Students with Disabilities and General Education Students

	Students with Disabilities	General Education Students
Grade 3 Math	83 percent	98 percent
Grade 4 Math	86 percent	98 percent
Grade 5 Math	86 percent	97 percent
Grade 6 Math	93 percent	99 percent
Grade 7 Math	77 percent	90 percent
Grade 8 Math	75 percent	98 percent

As seen in the tables above, the participation rate for students with disabilities was lower than general education students. The test with the narrowest gaps was Grade 6 Math (6 students). Whereas the other gaps ranged from 11 students to 21 students (Grade 3 ELA).

Summary and Implications

CCSD must be applauded for their efforts towards inclusive education. It appears to be implemented very well for many of the students and the teachers are extremely talented and trained to appropriately provide collaborative teaming to support the students with disabilities. The PCG consultants witnessed evidence-based inclusive education practices as well as superior instruction. However, to achieve "full inclusion" requires that every student receives the level and type of instruction that they require. If students are not making progress that they could make with support; not achieving the highest scores that they could achieve on the NY State assessments; and not working toward achieving a desired pathway to a diploma, additional models of support must be considered. In addition, teachers must not be over-extended trying to meet the needs of those students with more complex learning needs or a great system will never achieve further excellence for students with disabilities.

The district staff refers to the variety of additional support for students that may be struggling or need additional assistance, as Response to Intervention. There appear to be "RtI" teams within each elementary school and loosely defined at the middle schools, which are designed as mechanisms for early identification and support of students with learning and behavior needs. It was unclear if this system identified students through a universal screening.

However, the district may want to review the existing supports (AIS Before-School) and the "RtI" protocols, for the purposes of assuring that the variety of existing supports are organized differently within tiers and made available and more uniformed across all schools. Leveraging Grades 3-8 standardized assessment data reviewed earlier, the district may want to further study the supports offered based in the following areas: Grade 5 Math; Grade 6 ELA and Math; Grade 7 Math; Grade 8 ELA.

Since Response to Intervention is *a* term used for a specific research-based approach to addressing the support of struggling learners prior to any consideration of classification, it may be more accurate to referred these services as a Multi-Tiered System of Support (MTSS). Lastly, the district may consider formalizing their system of tiered support so to identify students with learning challenges that may be designated as special education.

It is recommended that AIS become a component of Tier 2 intervention within the newly organized MTSS system; and used to provide struggling students with assistance. The district may want to consider not using AIS as a special education service and replace this with Resource Room supplemental instruction adhering to the NY State Special Education Regulations.

It appears that the implementation of the CT model with a limit of 2 hours or less per day, across the district may be sufficient for some of the students, however, it is not meeting the needs of all of the students.

In addition, teachers report they are concerned about assuring all their students are getting what they need regarding special education service time. Classroom visits and interviews identified the need of additional special education teachers and well as a need to refine the current models and services. This is not to suggest that the district's foundational philosophical of "inclusion" needs or should be abandoned or must be compromised. In fact, by providing more special education teachers, creating more robust collaborative teaming options; and providing the needed direct instructional supplementary services, the goal of inclusion can be strengthened.

For example, the district may consider expanding on the CT model re-designing the way it provides these services to align with a more open and flexible service model. A more flexible service delivery model that is can more appropriately respond to the individual needs of students with disabilities and decrease the need to remove them from the general education classrooms such as Collaborative Consultation which is very similar to the district's current CT services however increases the time and way the special education teacher may provide support to his/he caseload.[71]

Within this model, the student is always placed in the general education classroom the special education and general education teachers have the flexibility in meeting the individualized and evolving needs of students with disabilities. Special educators are provided a caseload of students with disabilities, across a number of classrooms and/or teachers, for whom they are responsible for providing the specialized supports needed by each student. Unlike a more static model the special educator, in collaboration with their general educator, determines the daily/weekly level of support of the student in response to the changing demands of the curriculum and instruction.[72] The special educator uses all the vehicles of special education services available in a flexible schedule. This schedule may include small group or individual direct instruction within or outside the general education classroom; monitoring of students within the general education classroom; traditional models of co-teaching (including in-class support); modifications and adaptation to general education curriculum and instruction; teacher consultation; and technical assistance.

The special education faculty work diligently to customize the instruction for students with learning needs; and best practices were documented. However, both general and special education teachers identified areas in which they could benefit from some specialized and targeted professional development. Areas mentioned included (1) understanding and instructing students on the Autism Spectrum especially those that are dual diagnosed; (2) new approaches to co-teaching / consultant services; and (3) new approaches to the inclusion of student with extensive support needs.

[71] Deshler, D., Schumaker, J., Bui, Y., & Vernon, S. (2006). Teaching adolescents with disabilities: Accessing the general education curriculum. Thousand Oaks, CA: Corwin Press.
[72] Eisenman, L.T., Pleet, A.M., Wandry, D., McGinley, V., (2011). Voices of special education teachers in an inclusive high school: Redefining responsibilities. Remedial and Special Education 32(2) 91-104. Sage Publishing.

V. SUPPORT FOR TEACHING AND LEARNING

Strengths	Opportunities for Improvement
• **Highly Talented Staff and Retention**. CCSD is one of the highest-paying districts in the region and generally does not have recruitment or retention challenges. Teachers and administrators shared that rigorous tenure process leads to a highly talented staff. • **Mentorship Program**. New teachers and administrators appreciate the mentorship program. • **Wilson Trained Special Education Teachers**. The district made a considerable investment to train its special education teachers in the Wilson Reading method. • **Professional Development**. On the whole, the staff appreciate the PD offerings of the district.	• **Standard Operating Procedures Guide.** The district does not have a standard operating procedures guide. • **Special Education Administrator Presence in Schools**. Administrators and teachers would like increased opportunities for the Assistant Superintendent of Pupil Personnel Services and the Special Education Director to visit their schools. • **Consistent Communication from Special Education Department**. Due to turnover, teachers and building administrators feel the directives they have received from the Special Education Department have been inconsistent. • **Mentorship Program**. New teachers and administrators would like to see more special education instructional supports as part of the mentorship program. • **Professional Development**. Teachers would like more professional development to support the needs of complex learners (e.g. behavioral supports; supporting students with Autism; supporting students with emotional challenges). • **Interdepartmental Collaboration**. The Special Education Department needs to renew its close connection to the Office of Curriculum and Instruction. • **Special Education Budget**. The district does not have special education budgets by building or by setting (e.g. ICT, CT, Resource) at the building level. In addition, the detailed budget does not include a breakdown by service provider (e.g. OT, PT, Speech), and costs for special education instructional materials. • **Record Keeping**. During file review focus groups, inaccuracies were found regarding service-minutes for special education. • **Board Receipt of Redacted IEPs**. Board members receive whole redacted IEPs when the requirement set forth in Part 200.2(a) 4 indicates that the Board of Education is responsible for data reporting which only makes mention of the collection and maintenance of lists of number of students

	served via special ed and number of students not served.

This section provides information about CCSD' support for the teaching and learning of students with IEPs by addressing the following areas: Organization and Collaboration, Human Capital, Professional Development, Policies and Procedures, and Budget.

Organization and Collaboration

PCG reviewed how the central office and schools are organized for the effective and efficient administration and operation of special education and related services. The findings are described below.

Office of Special Education

Special education in CCSD is managed by the Director of Special Education and 504 Services. This individual directly reports to the Assistant Superintendent for Pupil Personnel Services. The Director of Special Education and 504 Services oversees three CSE Chairpersons, all of whom are psychologists by training and are considered psychologists and not central office administrators. This reporting structure is new as of the 2020-21 school year. Prior to that year, the Director of Special Education reported directly to the Assistant Superintendent for Curriculum and Instruction.

Exhibit 59. Organization Chart, Special Education Department, as of 2021-22 School Year[73]
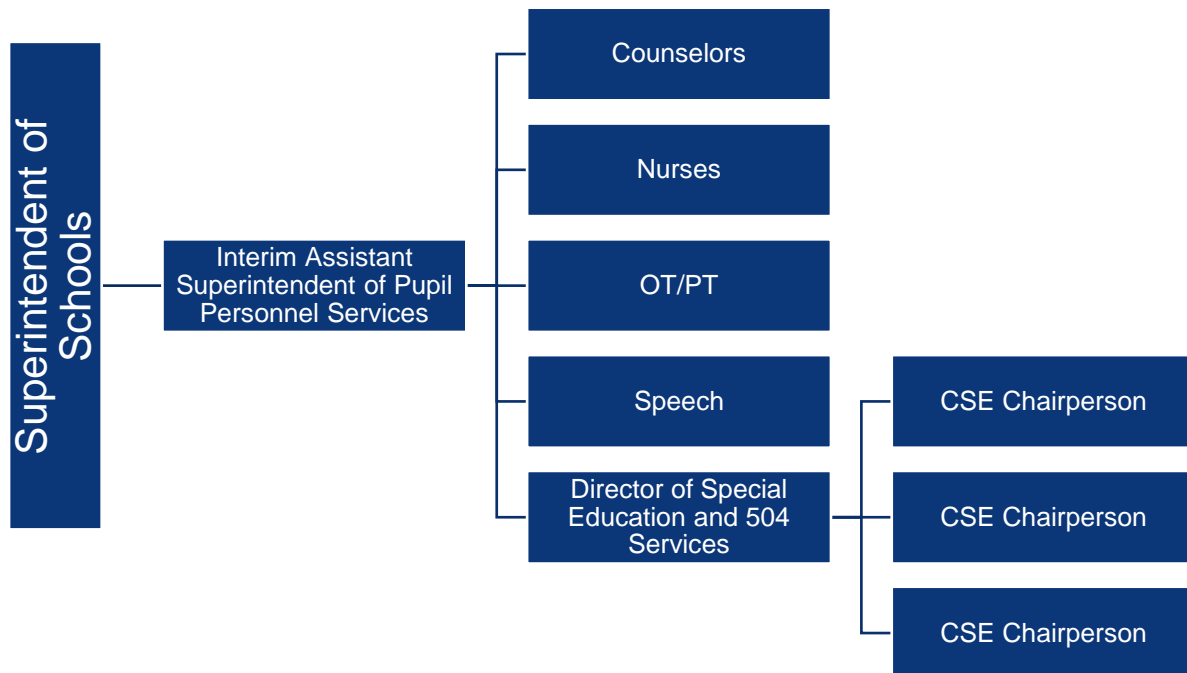
Special Education Office - Support to Schools

Throughout PCG's classroom visits, interviews, and focus groups, both teachers and administrators alike shared the challenges the district faced over the past two years because of the COVID pandemic. The

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[73] According to information provided to PCG by CCSD, the district does not have an official organizational chart; PCG used information from slides presented to the CCSD Board of Education on the organization of the Special Education Department.

pandemic impacted CCSD earlier than many other districts because of its proximity to the first cases of COVID in the US and CCSD had to quickly make the pivots from in-person to virtual, from virtual to blended, and from blended back to fully in person. At the same time, the district went through a re-organization, creating a new Assistant Superintendent for Pupil Personnel Services, changing the job description of the CSE Chairperson (moving away from being a central office administrator to being exclusively school psychologists). At the same time, the district's long-time special education director retired and the district experienced turn-over in the role.   The district also has experienced turnover in the Assistant Superintendent of Pupil Personnel Services Role. Suffice to say, all of these changes likely impacted the flexibility the Assistant Superintendent, the Director of Special Education, and the CSE Chairpersons in making school visits for the purpose of introductions. Nevertheless, during interviews and focus groups with building administrators and teachers, an overwhelming number of staff mentioned their desire to see more of these administrators in their buildings. They were specific in their desire to "get to know these individuals in times other than when there's a crisis."

In the staff survey, the staff were asked to respond to the statement: "Special education administration are frequently visible in buildings." Some 5 percent strongly agree and 13 percent agree with that statement.

Exhibit 60. Staff Survey: Special education administration are frequently visible in buildings.

Pie chart showing:
- 6, 5% Strongly Agree
- 14, 13% Agree
- 40, 37% Disagree
- 33, 30% Strongly Disagree
- 12, 11% Don't Know
- 4, 4% N/A

N = 109
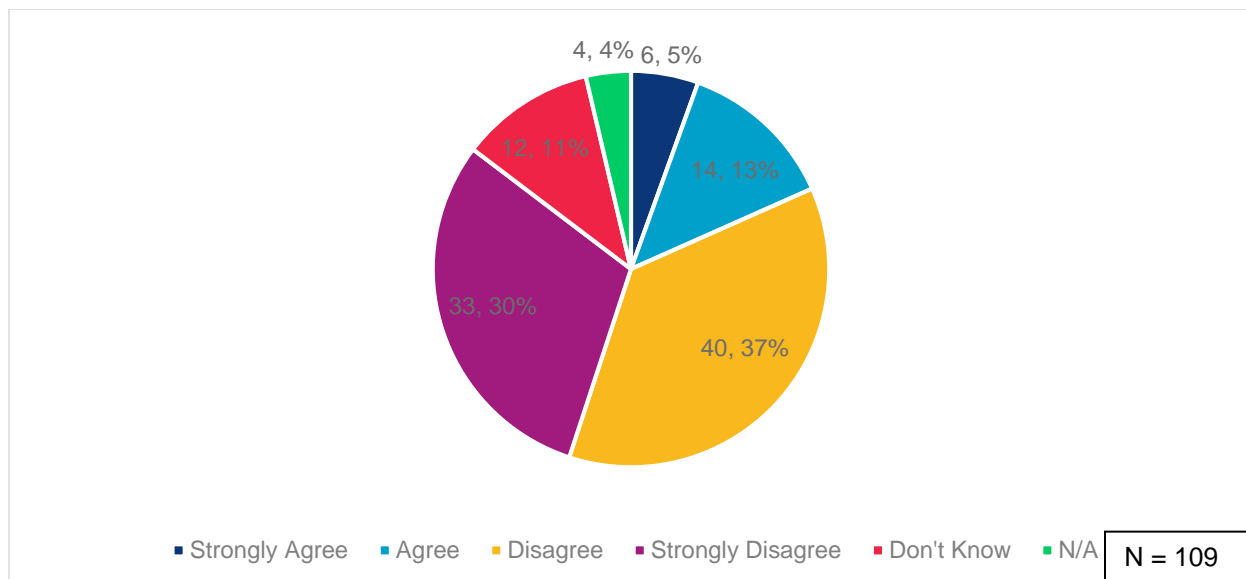
Communication to Schools

During file review focus groups, many staff shared their concerns about inconsistent communication from the Special Education Office and the Office of the Assistant Superintendent. This was specific to operating procedures – from RtI to IEP implementation. During file review focus groups, it was shared that information in written form is often in the form of an email; however, there are differences in how emails about process were sent to staff and shared consistently in the past.   Nevertheless, there is a strong desire by administrators and teachers for consistency.

Staff were asked to respond to the following statement in the staff survey: "There is effective and consistent communication between my building(s) and the central office." Some 4 percent strongly agreed and 18 percent agreed with that statement.

Exhibit 61. Staff Survey: There is effective and consistent communication between my building(s) and the central office.

Legend: ■ Strongly Agree ■ Agree ■ Disagree ■ Strongly Disagree ■ Don't Know ■ N/A   N = 109
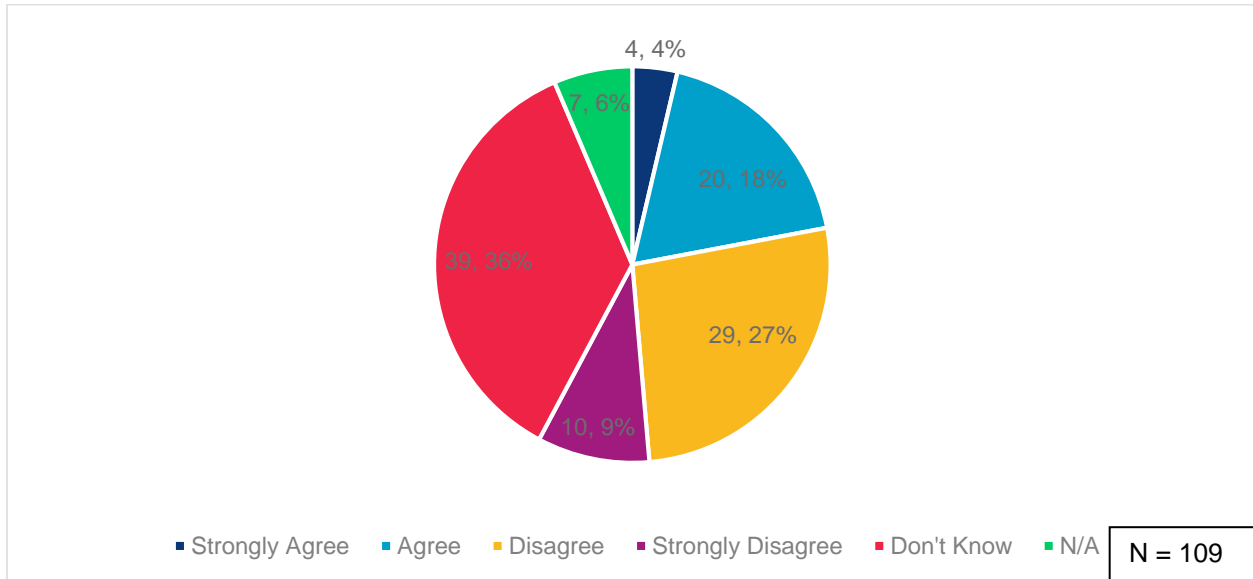
Human Capital

Staff Hiring and Retention

CCSD is one of the highest-paying districts in the region and generally does not have recruitment or retention challenges. According to administrative interviews, one challenge is retaining teachers because becoming a tenured teacher in Chappaqua is a rigorous process. According to interviews and focus groups, CCSD attends to hiring fully licensed teachers. The district has made a concerted effort to retain top talent by creating a multi-year mentorship program between new teachers and administrators and pairing them with veteran teachers and administrators. One item raised by both teachers and administrators is that the mentorship program does not engage or focus on special education – specifically around expectations for writing quality IEPs, progress monitoring, and the CSE process. Teachers, both special education and general education as well as those presently participating in the mentorship program shared concerns that they do not feel prepared in those key areas.

Teacher Allocation

The district administration shared the following information on teacher allocation: "Teachers are allocated to the buildings according to census. Each year, the census is generated, and the number of teacher FTEs are determined according to the number of classified students and their services. Students are grouped according to similarity of needed and grade level. While the state allows Learning Centers (Resource Rooms) to have up to five students, it often has less. While the state allows integrated classrooms to have up to 12 students, the district, as a practice, tends to have 5-9 students in each section."

Teaching Assistant Allocation

The district administration shared the following information on Teacher Aide (TA) allocation: "Teaching assistants are allocated to students according to their IEP mandate. The IEPs are written with a degree of specificity, so that the time is broken down by period or activity (for instance, a student may have a TA for math only, or for the time spent in job coaching or lunch). The frequency, duration, and ratio, as well as alignment to the master schedule, so that we can adequately staff for student need. The only program with a TA attached   to it is the high school Pathways program, which has a 12:1:1 ratio.

Professional Development

Through its four "Superintendent Conference Days," 2 in August, one in March and one in November, much of CCSD's professional development offerings occur. In addition, CCSD offers professional development opportunities in the summer. Teachers can also elect to attend professional developments and/or request time over the summer to engage in self-guided professional development. Administration informed us that although there may be a limited number of professional development offerings designed specifically to address students with disabilities, inherent in all CCSD professional development is instructional practices underpinned by differentiation.

Sampling of Offerings Specific to Supporting Students with Disabilities

- IEP Direct Training: Collaboration Portal for PPS Staff – January 13, 2021

- 2021 Summer Co-Teaching Curriculum – June 9, June 16, August 16, 2021

- Collab.academy: Digital Planning, Collaboration and Data Collection – 2019

- Collab.acadeny: Guiding & Deepening Our Understanding of Collaboration: Models of Co-Teaching and Co-Planning Strategies – Summer 2019

- Collab.academy 2019: Assistive Tech vs Ed. Tech – Summer 2019

- Collab.academy 2019: Analyzing Units for Access Points for All Learners – Summer 2019

- Collab.academy 2019: Planning for Your Planning Protocol – Summer 2019

- Co-Writer Universal and Snap Chat

- Collab Camp 2020 – June 24, 2020

- Woodcock Johnson Training – 10/13/20

- Special Education K-12: Scoring Woodcock Johnson Tests of Achievement – 3/13/20

- Supporting Students in our General Education Classroom – Date Unknown

- Active Learning Structures to Engage all Students – Date Unknown

- Assistive Technologies to Support Learning – Date Unknown

Sampling of Long-term Offerings to Special Education Teachers

- Wilson Reading Fellowship – 2018-19; 2019-20

- RULER – 2018-19

Sampling of Offerings to Support Struggling Learners: MTSS/RtI

- Interventionists & PPS: Using NWEA Maps for Personalized Instruction – Fall 2020

- Developing Student Action Plans – Date Unknown

Professional Development via Mentoring

As stated in the Human Capital section of this report, CCSD has made a concerted effort to retain top talent by creating a multi-year mentorship program between new teachers and administrators and pairing them with veteran teachers and administrators. One item raised by both teachers and administrators is that the mentorship program does not engage or focus on special education – specifically around expectations for

writing quality IEPs, progress monitoring, and the CSE process. Teachers, both special education and general education as well as those presently participating in the mentorship program shared concerns that they do not feel prepared in those key areas.

Feedback on Professional Development

Based on information gathered from interviews and focus groups, staff were appreciative of the professional development offerings provided by CCSD. One of the most consistent remarks came from special education teachers who have students with more complex profiles. For example, several teachers shared a desire to learn more about behavioral strategies for students with Autism; supporting the academic needs of students with Autism; and other opportunities to learn about teaching strategies that support students with low incidence disabilities.

On the staff survey, staff were asked for their impression on the following statement: "Professional development offerings I have attended enable me to better support the teaching/learning of students with IEPs. Some 9 percent strongly agreed and 39 percent agreed with that statement.

Exhibit 62. Staff Survey: Professional Development offerings I have attended enable me to better support the teaching/learning of students with IEPs.

Pie chart with segments: 10, 9% (Strongly Agree); 42, 39% (Agree); 25, 23% (Disagree); 17, 16% (Strongly Disagree); 6, 5% (Don't Know); 9, 8% (N/A). N = 109.

Legend: ■ Strongly Agree ■ Agree ■ Disagree ■ Strongly Disagree ■ Don't Know ■ N/A
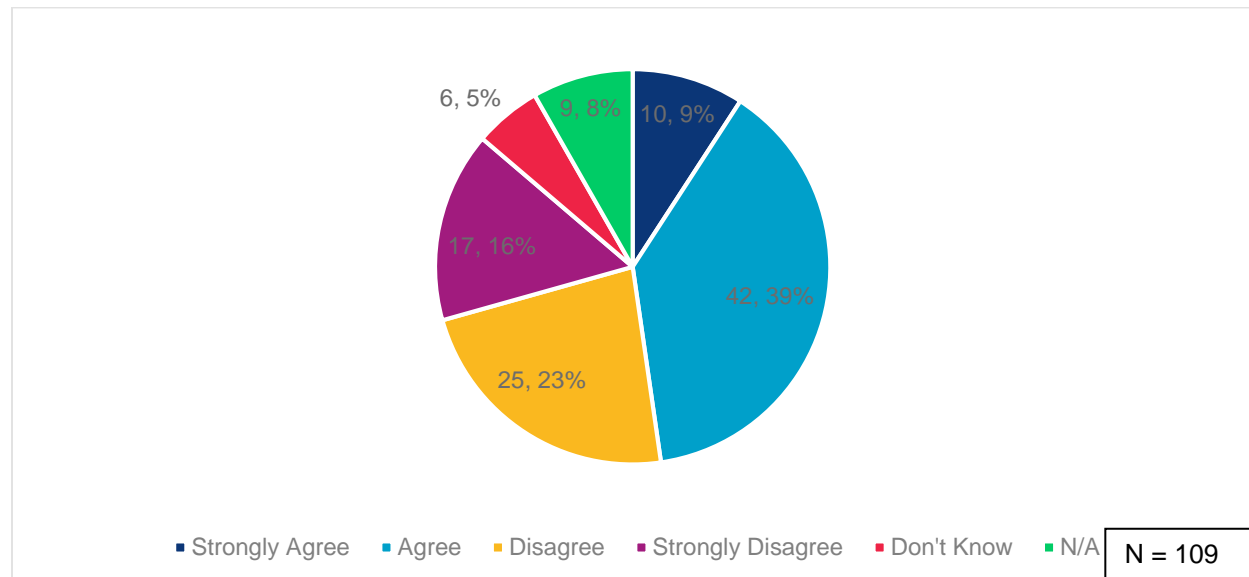
CCSD staff were asked whether they agreed or disagreed with the following statement: "Professional Development offerings I have attended enable me to better support the teaching/learning of students with IEPs." Overall, 39 percent of staff agreed and 9 percent strongly agreed.

As part of the staff survey, CCSD staff were asked to rank which professional development topics they believe would be the most helpful to them in the role they currently serve. The following is a summary of responses. Among the top three areas of interest were (1) Specific Disability Information (e.g. autism, emotional disturbance); (2) Positive Behavior Interventions and Supports; and (3) Using/Analyzing Data to Inform Instruction.

Exhibit 63. Staff Survey: I would like to attend professional development on the following topics.
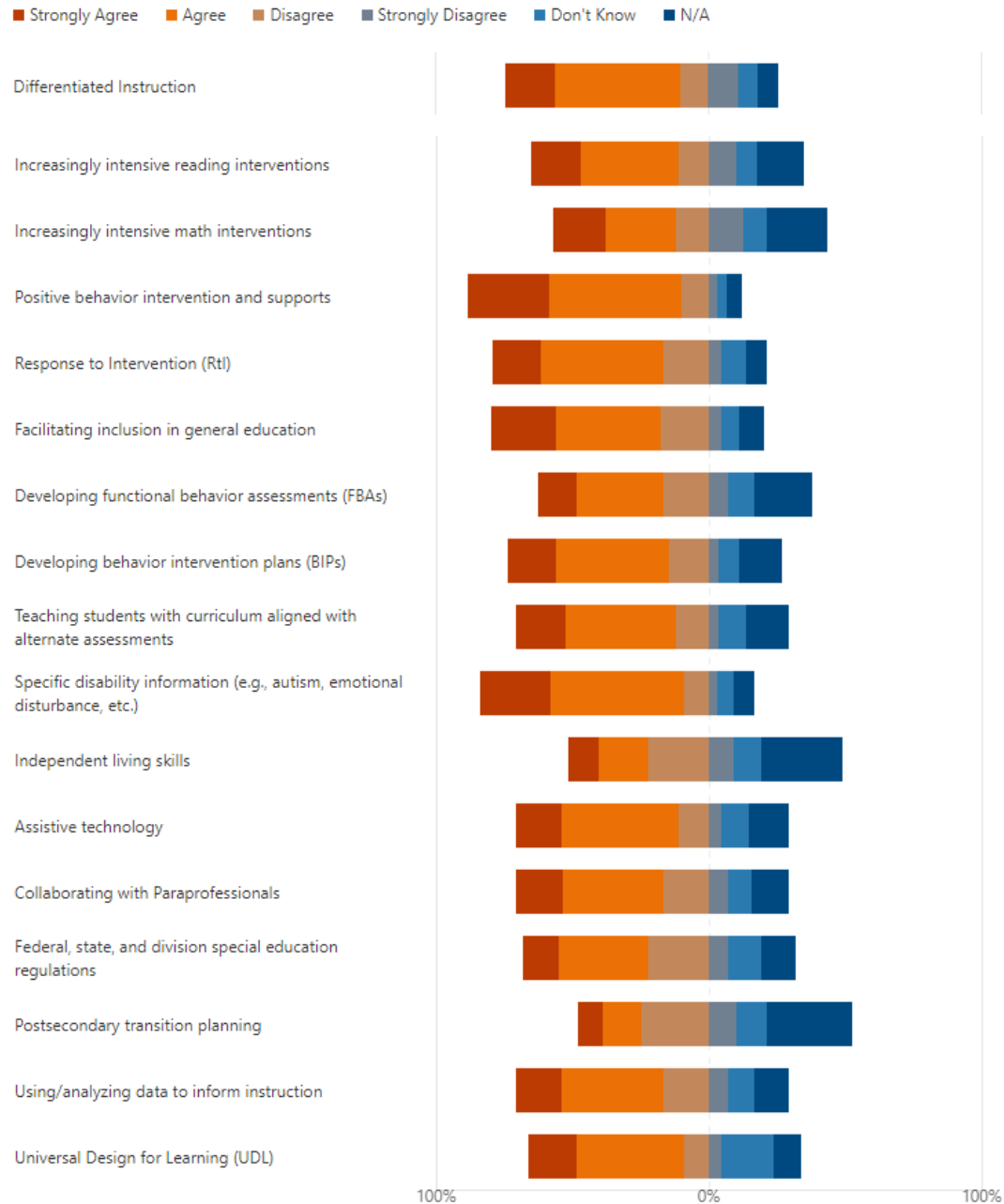
Interdepartmental Collaboration

According to information gathered from interviews and focus groups, the Special Education Department once was "attached at the hip" to the Office of Curriculum and Instruction because the Special Education Department's Director was overseen by the Assistant Superintendent for Curriculum and Instruction. Following the change of the organization chart and the creation of the Assistant Superintendent for Pupil Personnel Services, many shared they believe the Special Education Department became disconnected from Curriculum and Instruction. The collaboration with this office, as well as others throughout the school including departments within the buildings is critical to ensure that special education supports and services are a shared responsibility.

In addition, according to interviews and focus group, there is little to no interdepartmental collaboration between the Special Education Department and the Office of Diversity, Equity, and Wellness. According to interviews and focus groups, both offices have a focus on "inclusion" yet they have inconsistent definitions on inclusion.

Special Education Budget

PCG routinely reviews the budgets of school districts to assess the utilization of resources that support the instruction of students with disabilities. In this analysis, PCG (1) reviewed the special education instructional expenditures of peer Westchester County school districts; and (2) reviewed the special education expenditures per pupil of peer Westchester County school districts.

The following exhibit shows the percent of the CCSD budget in 2019-20 for the area of special education compared to four other New York districts. These data show CCSD has the second highest special education per pupil expenditure rate at $49,680; the highest among this peer group is Blind Brook-Rye UFSD at $57,727.

Exhibit 64. 2017-18 Special Education Fiscal Summary Data Provided by NYSED during 2019-20

	Special Education Instructional Expenditures	Special Education Expenditures Per Pupil	Pupils
Chappaqua CSD	$19,772,769	$49,680	398
Bedford CSD	$21,625,266	$39,390	549
Byram Hills CSD	$16,728,162	$47,659	351
Ossining UFSD	$25,267,217	$39,917	633
Blind Brook-Rye UFSD	$9,467,177	$57,727	164

During interviews, CCSD administration shared that the creation of the special education budget is a joint effort between the Special Education Director, the Superintendent for Pupil Personnel Services, and the Assistant Superintendent for Business.

The special education department provided the following information on out of district placement costs. According to CCSD, these data were based on the 2020-21 school year placements. They final eight students are not actual students, they are anticipated students, who either are with us but require more support or who might be new students transferring in. PCG was unable to obtain detailed information on out of district costs prior to the 2020-21 school year (e.g. costs student and by individual program).

Exhibit 65. CCSD Proposed Special Education Budget 2020-21

Proposed Special Education Budget 2021-2022

CHAPPAQUA CENTRAL SCHOOL DISTRICT
2021-2022 BUDGET INFORMATION

Special Education	Budget Codes			2019-20 Approved Budget	2019-20 Year End Actual	2020-21 Approved Budget	2020-21 Year End Projection	2021-2022 Proposed Budget	Approved vs. Proposed Variance $	Variance %
Equipment/Student Services	2250	200	35	12,000	694	15,000	15,000	15,000		
Equipment/Office	2250	201	35	2,000	-	2,000	2,000	2,000		
Contractual/Services to Students	2250	400	35	638,000	645,877	812,628	780,000	812,628		
Contractual/Office	2250	401	35	30,000	8,141	30,000	30,000	30,000		
SEDCAR 611	2250	405	35	85,000	58,345	75,000	75,000	75,000		
SEDCAR 619	2250	406	35	15,000	6,851	15,000	15,000	15,000		
Postage	2250	410	35	3,000	36	2,000	2,000	2,000		
Travel/Conferences	2250	415	35	3,500	1,483	3,500	3,500	3,500		
Travel/Conferences - Supervision	2250	415	35 S	4,400	3,311	2,000	2,000	5,000		
Hospital/Home Instruction	2250	441	35	10,000	5,000	8,000	8,000	8,000		
Supplies/Student Services	2250	450	35	18,000	22,856	25,000	25,000	25,000		
Supplies/Office	2250	451	35	6,000	6,000	6,000	6,000	6,000		
Tuition/NYS Public	2250	471	35	1,347,519	928,729	995,612	721,000	692,425		
Tuition/Private	2250	472	35	961,598	952,360	983,715	980,000	1,624,433		
BOCES Services	2250	490	35	1,520,205	924,536	1,367,135	1,057,200	900,462		
TOTAL	2250			$4,656,222	$3,564,219	$4,342,590	$3,721,700	$4,216,448	$ (126,142)	-2.90%
Special Education - Transportation										
Special Education	5540	402	35	1,441,035	45,652	1,460,000	1,460,000	1,472,000		
Special Education - Contract	5540	402	35 C		609,935					
Van Monitors	5540	402	35 MON	609,112	502,632	600,000	50,000	623,900		
				$2,050,147	$1,158,219	$2,060,000	$1,510,000	$2,095,900	$ 35,900	1.74%
Interfund Transfers										
Transfer to Special Aid - Summer School Program	9901	950	35	155,000	155,000	150,000	150,000	150,000	$ -	0%
GRAND TOTAL				$6,861,369	$4,877,438	$6,552,590	$5,381,700	$6,462,348	$ (90,242)	-1.38%

Based on special education budgets from this year and the past important patterns can be observed in the following areas: (1) Tuition – Public; (2) Tuition – Private.

Exhibit 66. CCSD Special Education Expenditures on Out of District Tuition and BOCES Services
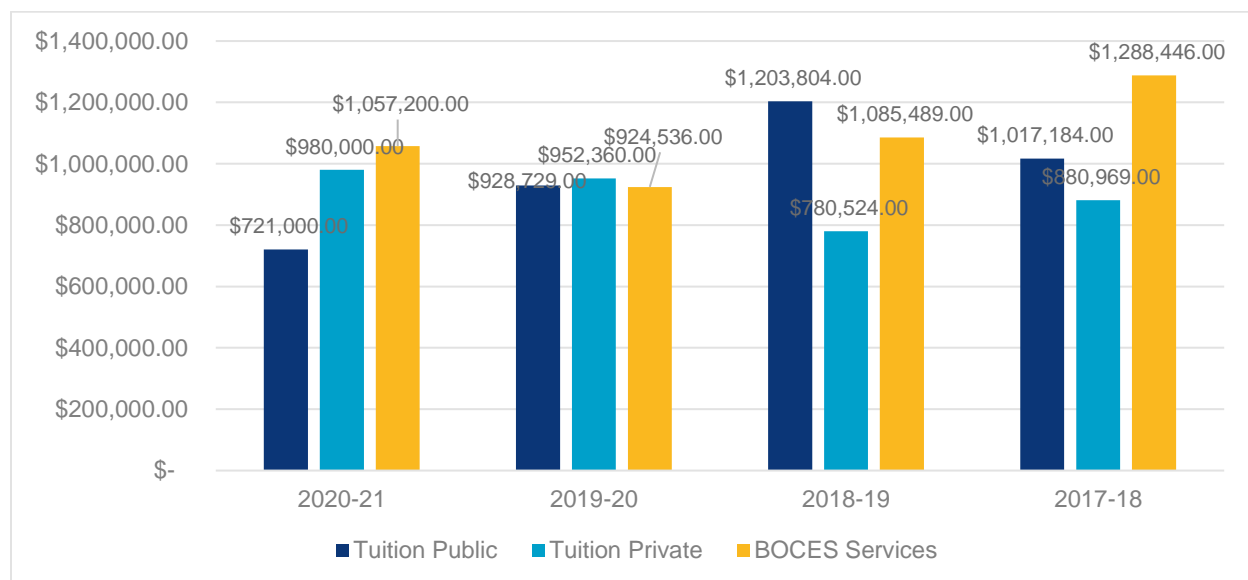
PCG requested a detailed budget of the district's special education program, broken by specific line items specific to instruction as well as building-based allocations. However, the district shared that the breakdown was not available. CCSD informed PCG that the district does not budget its special education programming in that manner.   In addition, they formed PCG that this was at the direction of the former Assistant Superintendent of Business and that now there is a new Assistant Superintendent of Business who may have different ways of working with the Special Education Department in supporting the annual budget process. Therefore, it was not possible to conduct a thorough analysis of items specified by the district in its RFP, including:

a) Personnel cost distribution;
b) Contracted services (private day school placements, OT/PT services, etc.;
c) Auxiliary costs (technology, nursing care, transportation);
d) Professional development resources;
e) Cost analysis of out-of-district placements by program type; and
f) Grant eligibility, access and use.

Staffing Ratio Comparisons

Information used to compare CCSD staff ratios to other school districts was provided through several surveys conducted by the Urban Special Education Leadership Collaborative, and was supplemented by data from reviews conducted independently, or with the Council of Great City Schools and PCG over the past five years.[74] Data from 70 other school districts provide a general understanding of districts' staffing levels in the following areas: special educators, instructional assistants, speech language pathologists, psychologists, social workers, nurses, occupational therapists, and physical therapists. Additional details, CCSD Staffing Ratios Compared to Other Districts, are provided in the Appendix. The data do not provide precise district comparisons, and the results need to be interpreted with caution. At times, district data are not uniform (e.g., including or excluding contractual personnel, varying methods for collecting and reporting student counts) and are impacted by varying levels of private and public placements, where personnel outside a district provide special education/related services to a group of district students. However, these data are the best available and are useful to better understand staffing ratios for school districts.

The ratios reported below are provided for special educators, professional assistants, psychologists, speech/language pathologists, social workers, nurses, and occupational therapists (OTs). The figures do not reflect actual caseload ratios for each of these personnel areas based on student IEPs. Rather, they are based on full time equivalent (FTE) staff members and not on the number of positions *per se*. The total FTE count for each area is compared to the total number of students with IEPs in the district.[75]

CCSD provided the following personnel headcount numbers for the 2021-22 school year. The district has a total of 40.5 special education teachers; 54 paraprofessionals; 8 psychologists; 2 social workers; 6.5 speech pathologists; 7 nurses; 2 occupational therapists and 1 physical therapists. Below are the staffing breakdowns for each building.   The district was unable to provide the number of special education paraprofessionals per building.

Special Education Teachers and Professional Assistants

Information about CCSD' special education teacher and professional assistant ratios compared to other school districts is included below.

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[74] Sue Gamm, Esq. compiled and continues to maintain this list. She grants PCG permission to use the data in reports.
[75] CCSD staffing ratio calculations based on data provided by CCSD to PCG.

Exhibit 67. Average Number of Students with IEPs for Each Special Educator and Professional Assistant[76]

Areas of Comparison	Special Educators	Professional Assistants
Number of CCSD Staff FTE	40.5	54
CCSD Student w/IEP-to-Staff Ratio	10:1	7.5:1
All District Average Ratios	14.5:1	15.3:1
CCSD Ranking Among Districts	11th out of 72 reporting districts	8th out of 72 reporting districts

- **Special Educators.** CCSD has an overall average of 10 students with IEPs for each special educator. This average is lower than the 14.5-student average of all districts in the survey. CCSD has the eleventh lowest ratio among the 72 reporting school districts.

- **Professional Assistants.** CCSD has an overall average of 7.5 students with IEPs for each professional assistant. This average is lower than the 15.4-student average of all districts in the survey. CCSD has the eighth lowest ratio among the 72 reporting school districts.

Student Services and Related Service Providers

Information about CCSD's student services and related service providers compared to other school districts is included below.

Exhibit 68. Average Number of Students with IEPs for Each Student Services and Related Service Provider[77]

Areas of Comparison	Psychologists	Speech/ Language Pathologists	Social Workers	Occupational Therapists	Physical Therapists
Number of CCSD Staff FTE	8	6.5	2	2	1
CCSD Student w/IEP-to-Staff Ratio	50.5:1	62.5:1	1,739:1	1,739:1	3478:1
All District Average Ratios	165.5:1	116.7:1	327.5:1	420.2:1	1219:1
CCSD Ranking Among Districts	3rd out of 72 reporting districts	11th out of 72 reporting districts	47th out of 72 reporting districts	68th out of 72 reporting districts	67th out of 72 reporting districts

- **Psychologists**. There is one psychologist for an average of 50.5 students with IEPs compared to the surveyed district average of 165.5 students, ranking CCSD as third of the 72 reporting districts.

- **Speech/Language Pathologists**. There is one speech/language pathologist (SLP) for an average of 62.5 students with IEPs compared to the surveyed district average of 116.7 students, ranking CCSD as eleventh of the 72 reporting districts.

- **Social Workers**. There is one social worker for an average of 1,739 students with IEPs compared to the surveyed district average of 327.5 students with IEPs, ranking CCSD as 47th of the 72 reporting districts.

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[76] CCSD's professional assistants are compared to paraeducator data nationally.
[77] CCSD does not employ physical therapists; therefore, comparison data are not included.

- **Occupational Therapists (OT)**. There is one OT for an average of 1,739 students, compared to the surveyed district average of 420.2 students, ranking CCSD as 68th of the 72 reporting districts.

- **Physical Therapy (PT)**. There is one PT for an average of 3478 students, compared to the surveyed district data average of 1069 students, ranking CCSD 67th out of the 72 reporting districts.

Special Education Teachers and Professional Assistants by Building

As stated earlier, the district administration shared the following information on teacher allocation: "Teachers are allocated to the buildings according to census. Each year, the census is generated, and the number of teacher FTEs are determined according to the number of classified students and their services. Students are grouped according to similarity of needed and grade level. While the state allows Learning Centers (Resource Rooms) to have up to five students, it often has less. While the state allows integrated classrooms to have up to 12 students, the district, as a practice, tends to have 5-9 students in each section."

Exhibit 69. Special Education Staffing Ratios by Building: Horace Greeley High School

Horace Greeley High School – 9% SWD	FTEs
Special Education Teachers	15 (7.6 students:1 teacher)
Psychologists	3
Social Workers	.5
Speech Pathologists	1.5
Nurses	2
Occupational Therapist (2 for 6 schools)	.3
Physical Therapist (1 for 6 schools)	.16

Exhibit 70. Special Education Staffing Ratios by Building: Robert E Bell Middle School

Robert E Bell Middle School – 12% SWD	
Special Education Teachers	6 (12 students:1 teacher)
Psychologists	1
Social Worker	.5
Speech Pathologist	1
Nurse	1
Occupational Therapist (2 for 6 schools)	.3
Physical Therapist (1 for 6 schools)	.16

Exhibit 71. Special Education Staffing Ratios by Building: Seven Bridges Middle School

Seven Bridges Middle School – 8% SWD	
Special Education Teachers	6 (7.6 students:1 teacher)

Psychologists	1
Social Worker	.5
Speech Pathologist	1
Nurse	1
Occupational Therapist (2 for 6 schools)	.3
Physical Therapist (1 for 6 schools)	.16

Exhibit 72. Special Education Staffing Ratios by Building: Douglas Grafflin Elementary School

Douglas Grafflin Elementary School – 9% SWD	FTEs
Special Education Teachers	4 (9.25 students: 1 teacher)
Psychologists	1
Speech Pathologist	1
Nurse	1
Occupational Therapist (2 for 6 schools)	.3
Physical Therapist (1 for 6 schools)	.16

Exhibit 73. Special Education Staffing Ratios by Building: Roaring Brook Elementary School

Roaring Brook Elementary School – 11% SWD	FTEs
Special Education Teachers	3.5 (12.5 students: 1 teacher)
Psychologists	1
Speech Pathologist	1
Nurse	1
Occupational Therapist (2 for 6 schools)	.3
Physical Therapist (1 for 6 schools)	.16

Exhibit 74. Special Education Staffing Ratios by Building: Westoarchard Elementary School

Westorchard Elementary School – 8% SWDs	FTEs
Special Education Teachers	3 (10.3 students: 1 teacher)
Psychologists	1
Speech Pathologist	1

Nurse	1
Occupational Therapist (2 for 6 schools)	.3
Physical Therapist (1 for 6 schools)	.16

Record Keeping

CCSD uses Frontline IEP Direct for its IEP case management system. Based on information gathered from interviews and focus groups, the district maintains and retains special education records using this system. However, the district recently added an option to IEP Direct that allows district personnel to add documents to the IEP file (e.g. observation notes from an out of district placement, external evaluation). Based on information gathered from file review focus groups, this feature is not used consistently.

Based on information gathered from interviews, the district has previously had issues with accuracy within IEPs. The inaccuracies PCG saw during file review focus groups largely focused on the incorrect number of minutes for special education services, specifically at the middle school.

During file review focus groups and classroom visits, data collection is largely occurring using a clipboard and documents. There was no evidence of teachers using tablets and/or electronic forms to capture the data of students with IEPs.

During interviews and focus groups, it was shared that members of the Board of Education receive redacted copies of every IEP of every student that has been found eligible. The district engages in this practice to meet New York Regulations. However, some board members expressed confusion over the purpose of receiving IEPs and suggested they are "approving" the IEP when, in fact, their role is to approve the financial oversight of the decision and not the determination made by the CSE or CPSE.

It is important to note the following regarding how this is indicated in New York Regulations, as stated in Part 200.2(d) 1-2:

> *The Board must arrange for the appropriate special education programs and services to be provided to a student with a disability as recommended by the committee on special education. The board shall notify the parent of its action in accordance with section 4402(2)(b)(2) of the Education Law.*

> *(2) Approval of services for preschool students with disabilities. The board of education or the board of trustees of each school district shall, upon completion of the recommendation of the committee on preschool special education for special education programs and services, including changes to the committee's recommendation made pursuant to section 200.4(g) of this Part, arrange for appropriate special education programs and services for a preschool student with a disability, as recommended by the committee on preschool special education, from among the services and programs approved for such purpose by the commissioner. The board shall notify the parent, the municipality and the commissioner of its action in accordance with section 4410 of the Education Law.*

Furthermore, Part 200.2(a) 4 indicates that the Board of Education is responsible for data reporting which only makes mention of the collection and maintenance of lists of number of students served via special ed and number of students not served.

Lastly, Part 200. 2 (b) 6 indicates the following:

> *…for the purpose of ensuring the confidentiality of personally identifiable data, information or records pertaining to a student with a disability. Such personally identifiable information shall not*

be disclosed by any officer or employee of the State Education Department or any school district, or member of a committee on special education or committee on preschool special education to any person other than the parent of such student, except in accordance with sections 300.500 through 300.536 and sections 300.610 through 300.625 and Part 99 of title 34 of the Code of Federal Regulations (Code of Federal Regulations, 2009 edition, title 34, sections 300.500 - 300.536, sections 300.610 through 300.625, and Part 99, Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402-0001; 2009 - available at the Office of Counsel, New York State Education Department, State Education Building Room 148, 89 Washington Avenue, Albany, NY 12234).

Therefore, within its capacity to arrange for the appropriate special education programs and services to be provided to a student with a disability as recommended by the committee on special education, the district can provide a list that includes the following information instead of redacted IEPs: a brief summary that includes recommendations and service details that warrant or incur a cost to the district; however, the student ID or other personally identifiable information cannot be listed. Redacted IEPs share more student information than what Board Members need in their capacity and potentially expose the district to risk in human error on redactions.

Summary and Implications

CCSD is one of the highest-paying districts in the region and generally does not have recruitment or retention challenges. Teachers and administrators shared that rigorous tenure process leads to a highly talented staff. At the same time, teachers and administrators appreciate the district's recent mentorship program for new teachers.

In the past few years, CCSD made a considerable investment to train its special education teachers in the Wilson Reading method. This is appreciated both staff and parents alike; the districts Reading as a Related Service is led by Wilson Trained Reading Specialists and received high praise. On the whole, the staff appreciate the PD offerings of the district.

Challenges, however, have been felt by staff and administrators because the district does not have a standard operating procedures guide. This issue is compounded by administrator turnover; due to turnover, teachers and building administrators feel the directives they have received from the Special Education Department have been inconsistent. Under present leadership in the Office of Pupil Personnel Services and Special Education, building leaders and teachers alike voiced their desire to see more of the central office administration in their buildings.

Although professional development received praised, there were also areas noted for improvement: (1) New teachers and administrators would like to see more special education instructional supports as part of the mentorship program and (2) Teachers would like more professional development to support the needs of complex learners (e.g. behavioral supports; supporting students with Autism; supporting students with emotional challenges).

Over the past few years, Special Education and Curriculum and Instruction have gone from "attached to the hip" to being "siloed." Special Education Department needs to renew its close connection to the Office of Curriculum and Instruction.

The district does not have special education budgets by building or by setting (e.g. ICT, CT, Resource) at the building level. In addition, the detailed budget does not include a breakdown by service provider (e.g. OT, PT, Speech), and costs for special education instructional materials. This makes it challenging for an outsider (such as PCG) or internally (such as the Office of Pupil Personnel Services) to see special education expenditures at the building level.

In regards to record keeping PCG found challenges with IEP inaccuracies regarding During file review focus groups, inaccuracies were found regarding service-minutes for special education.

PCG also identified issues around information shared with the Board of Education regarding student IEPs. Presently, Board members receive whole redacted IEPs when the requirement set forth in Part 200.2(a) 4 indicates that the Board of Education is responsible for data reporting which only makes mention of the collection and maintenance of lists of number of students served via special ed and number of students not served. Within its capacity to arrange for the appropriate special education programs and services to be provided to a student with a disability as recommended by the committee on special education, the district can provide a list that includes the following information instead of redacted IEPs: a brief summary that includes recommendations and service details that warrant or incur a cost to the district; however, the student ID or other personally identifiable information cannot be listed.

VI. PARENT ENGAGEMENT

Strengths	Opportunities for Improvement
• **Highly engaged parents.** The parents of CCSD students are highly engaged and care about their child's school and their child's academic outcomes. • **CCSD Special Education Website.** The CCSD Special Education Department webpage contains a lot of useful information for parents. • **Responsiveness.** Most surveyed parents believe the district responds within a reasonable timeframe. • **Parent Trainings.** CCSD offers several opportunities for parent trainings through the district and the Special Education PTO.	• **CCSD Special Education Website.** Some information on the CCSD Website is dated and needs to be updated. • **Parent Training Awareness**. Surveyed parents overwhelmingly said they were not aware of the trainings. • **Communication about Student Progress**. Many parents shared they want more information on student progress relative to their IEP. • **Service Delivery**. Many parents expressed concern for a lack of time their child has with the Consultative Teacher. • **Full Inclusion**. Some parents felt that they appreciated the full inclusion philosophy but that their child was excluded because of the lack of appropriate services.

This chapter summarizes findings from CCSD specific to perceptions of parent and community engagement.

Parents are a child's first teacher and are important partners as their children progress through school. Their vital role is acknowledged in IDEA, which requires parental input in writing IEP goals, the provision of related services, and placement. IDEA also requires collaboration with parents and students with disabilities, as appropriate, to design special education along with related and other supplementary services. As part of this review, the parent's role and satisfaction with special education processes and instructional/service delivery within CCSD were evaluated. The review sought to examine three topics related to parent and family engagement:

- **Information and communication:** The extent to which parents are provided with useful information and communication throughout the process, have the ability to find consistent and reliable information about each process, and the extent to which the resources (literature, documentation, etc.) support the process;

- **Parent voice, collaboration, and trust:** The extent to which stakeholders feel that their input is solicited, heard, and included; resources used to facilitate communication with parents of students with disabilities; and how parents are approached to collaborate with school staff in a trusting manner; and

- **Student support:** The extent to which parents believe the evaluation process and IEPs support their children, and that appropriate placements, instruction, services, interventions and accommodations are provided.

Information and Communication

The parent survey asked questions about communication with CCSD and their child's school. On the parent survey, 29 percent strongly agreed and 47 percent agreed with the statement: "Teachers/school staff communicate effectively with me."

Exhibit 75. Parent Survey: Teachers/school staff communicate effectively with me.

Strongly Agree   Agree   Disagree   Strongly Disagree   Don't Know   N = 104
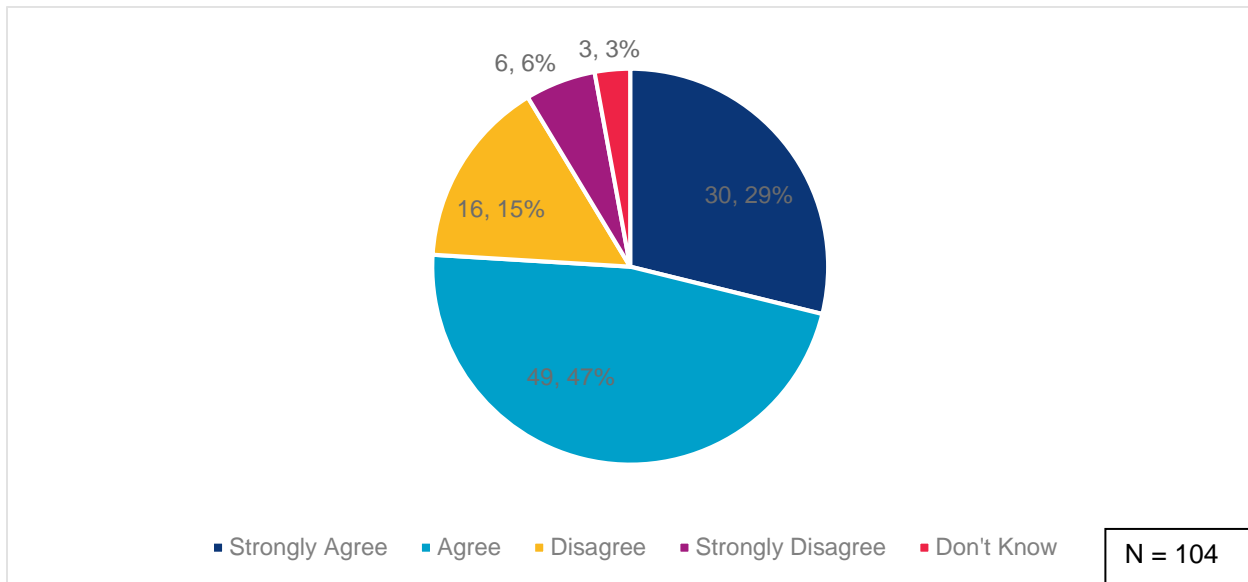
On the parent survey, 28 parents strongly agreed and 56 percent of parents agreed that school staff respond to their concerns within a reasonable timeframe.

Exhibit 76. Parent Survey: School staff respond to my concerns within a reasonable time period.

Strongly Agree   Agree   Disagree   Strongly Disagree   Don't Know   N = 104
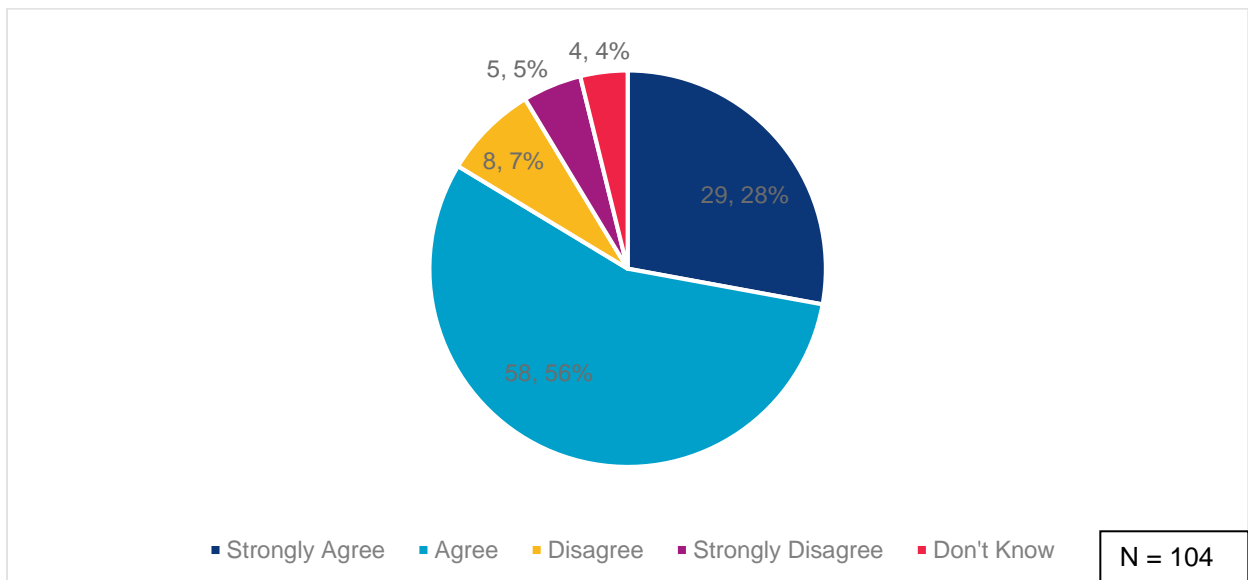
Some parents expressed confusion over who to contact with concerns or questions about their child. Administrators said that the contact person would depend on what the issue was about and could be any number of people.   This leads to confusion, and it would be best for the parent to have a primary contact person (case manager) who could then direct them to the appropriate person or make the connection for them.

On the parent survey, parents were asked to respond to the following question: "In the past year, have you attended parent trainings or information sessions offered by the district?" Some 23 percent responded with "yes," while 65 percent responded "no."

Exhibit 77. Parent Survey: In the past year, have you attended parent trainings or information sessions offered by the district?

Legend: ■ Yes ■ No ■ Don't Know ■ Not Applicable

N = 104
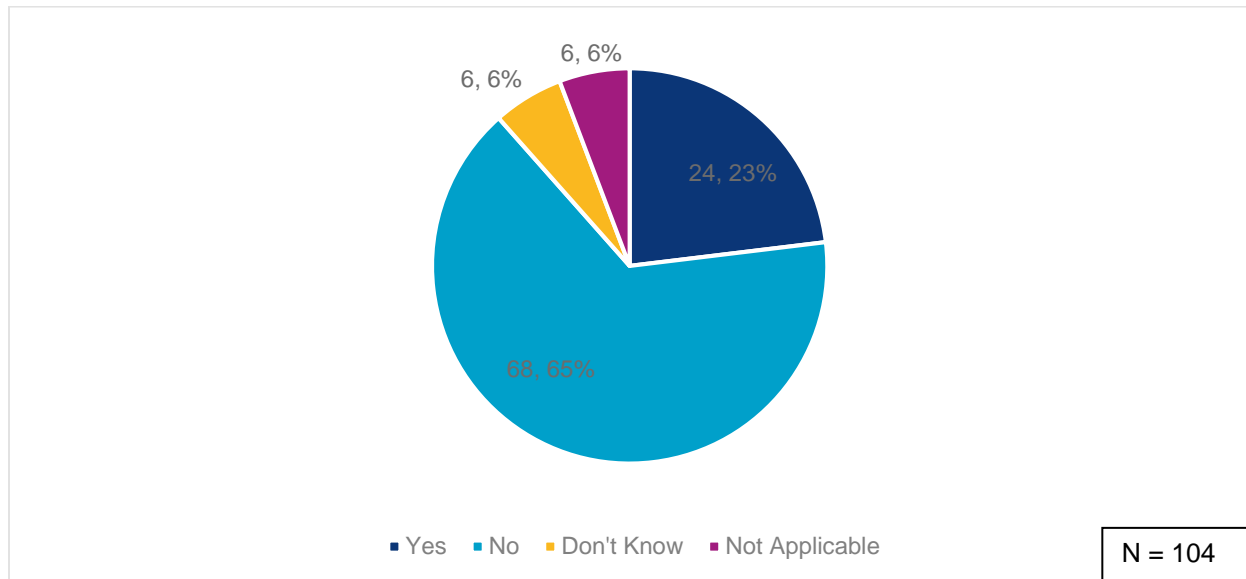
Of the parents who indicated they attended a parent training or information session in the past year, they were asked in the survey: "If yes, was the parent training you attended helpful?" Some 77 percent responded affirmatively with "yes."

Exhibit 78. Parent Survey: If yes, was the parent training you attended helpful?

Legend: ■ Yes ■ No ■ Don't Know

N = 26
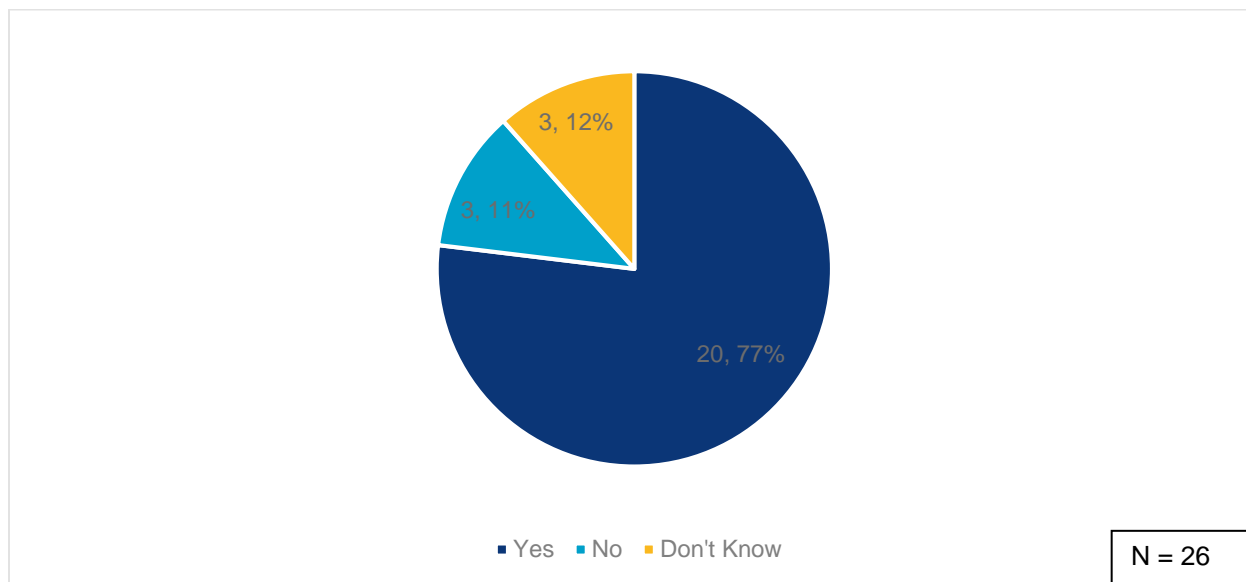
According to CCSD administration, it conducts meaningful parent engagement in the following ways:
- After each CSE meeting, the parent receives a copy of the new or updated IEP'
- Progress reports on goals are provided quarterly (and after extended school year if a student attends;
- Parent/teacher conferences occur at the building level at least annually and more often as requested;

- The Special Education PTA holds many meetings, including office hours, and CCSD administration often attend these meetings as participants or presenters;
- The PTA and local community organizations provide parent training and information. These presentations are shared with parents via the PTA newsletter and listservs;
- The district contracts with a local agency that provides information about transition planning specific to students who are Alternatively Assessed. These presentations are recorded monthly and materials are shared with parents;
- The PTA and the Special Education Department has collaborated on information about the CSE process
- Per regulation, the Special Education Department shares the "CSE Meeting Packet" at least five days prior to the CSE meeting, inclusive of updated evaluations, classroom observations, and progress reports;
- The Assistant Superintendent for Pupil Personnel Services and the Director of special education meet with PTA officers monthly to engage in conversations with parents and offer them an opportunity to share concerns.

According to the CCSD website, it has provided the following trainings to parents in both online and in-person formats:
- Video: SEPTA College Search & Exploration Process (4/15/21)
- Handout
- Video: CPSE-to-CSE Information Meeting (2/24/21)
- Presentation: CPSE-to-CSE Information Night (2/24/21)
- Presentation: ARC Westchester Transition Planning Info Mtg (2/3/21)
- Video: ACT/SAT Test Prep Strategies for Students with IEPs/504s (2/5/20)
- Video: Assistive Technologies to Support Learning (12/4/19)
- Video: Evaluation & Assessment Process (11/13/19)
- Video: Special Needs Planning - Key Legal/Financial Considerations (5/8/19)
- Video: Transition To College (3/19/19)
- TAA Youth Ambassador Program (12/6/18)
- Video: College Test Prep Process for Parents Caregivers of Students with 504s and IEPs (11/14/18)
- Video: Special Education 101 with WIHD (9/18/18)
- Video: General Education Supports & Special Education Eligibility (5/24/18)
- Presentation: Special Needs Planning Workshop (4/17/18)
- Video: Transition To College (2/28/18)
- Video: Transition Planning - A Hands-on Workshop (2/15/18)
- Video: Talking To Our Children About Their Learning Differences (11/8/17)
- Video: Skills for Success with Cindy Goldrich (10/18/17)
- Video: Executive Functioning (Knowledge Cafe on 10/26/17)
- Video: Top 10 Strategies for Parenting Kids with ADHD/EF Challenges with Cindy Goldrich (9/12/17)
- Video: Emotional Intelligence (Knowledge Cafe on 5/15/17)
- Video: STEAM education in Chappaqua (Knowledge Cafe on 4/24/17)
- Video: Use of space and advanced technology to support students, K-12 (Knowledge Cafe on 4/18/16)

Disagreement on Special Education Matters

In the parent survey, parents were asked "During the previous 12 months, have you had a disagreement(s) with the school regarding your child's eligibility, placement, goals, services, or implementation?" Some 64 responded "no" and 35% responded "yes."

Exhibit 79. Parent Survey: During the previous 12 months, have you had a disagreement(s) with the school regarding your child's eligibility, placement, goals, services, or implementation?

34, 35%

64, 65%

■ Yes ■ No

N = 98
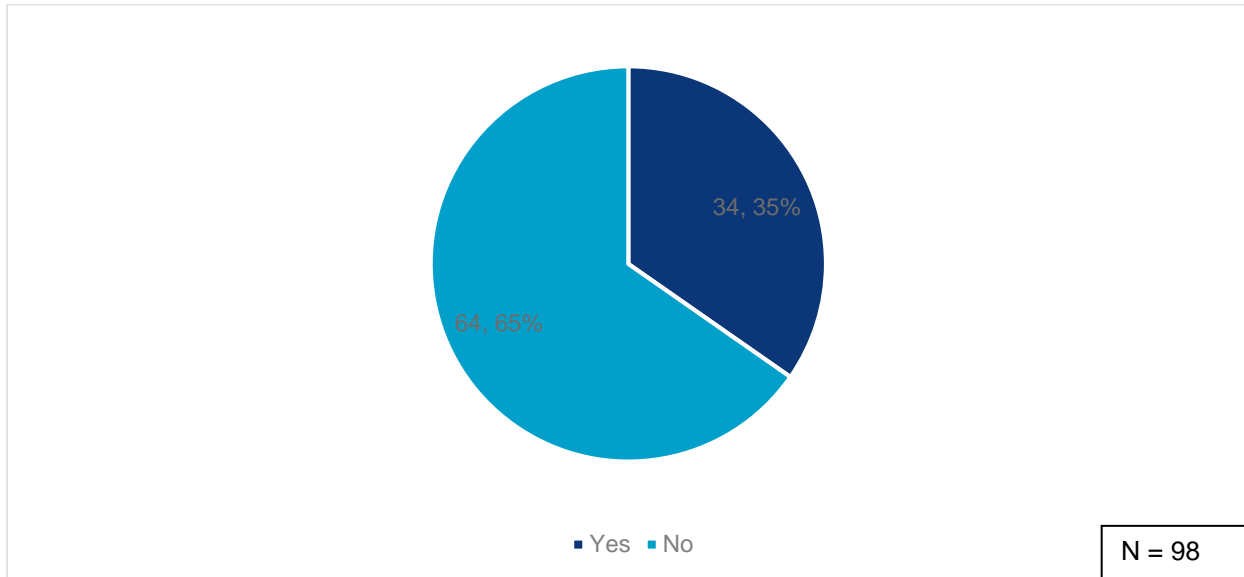
Of the 35 percent of parents who responded "yes" to the last question, they were asked to respond to the statement: "If yes, during the disagreement district representatives treated me with respect." Some 74 percent responded stating "yes."

Exhibit 80. Parent Survey: If yes, during the disagreement district representatives treated me with respect

4, 10%

6, 16%

28, 74%

■ Yes ■ No ■ Don't Know

N = 38
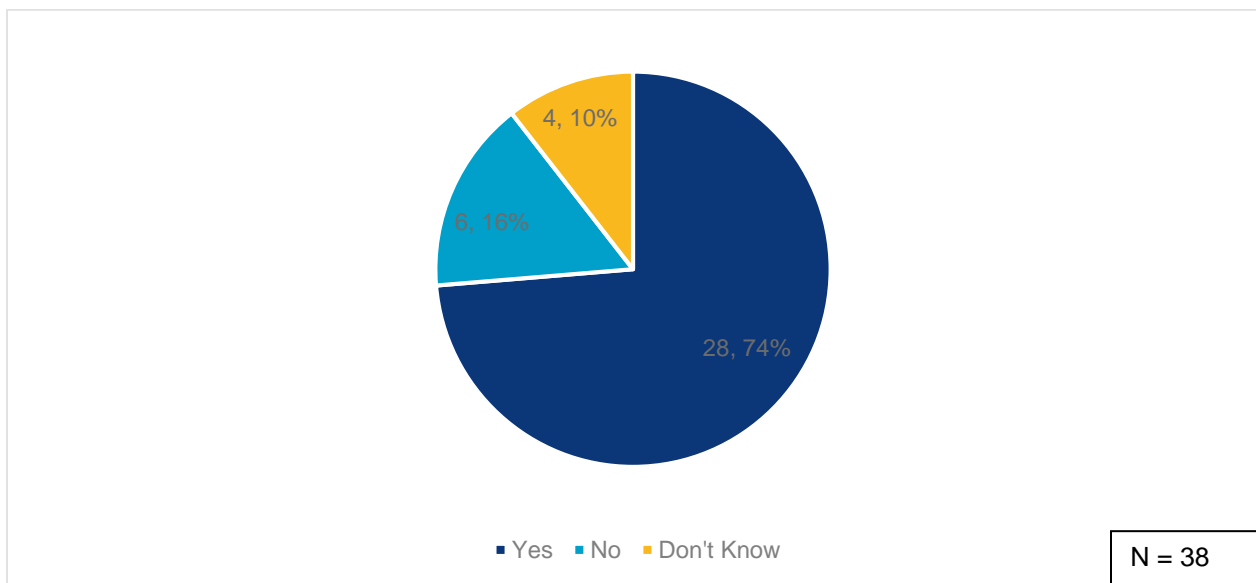
Lastly, of the parents who experienced disagreement, parents were asked to respond to the statement: "If yes, I was satisfied with how the district or school attempted to resolve the disagreement(s)." Some 45 percent responded "yes" and 47 percent responded "no."

Exhibit 81. Parent Survey: If yes, I was satisfied with how the district or school attempted to resolve the disagreement(s)

Yes ■ No ■ Don't Know

3, 8%
17, 47%
16, 45%

N = 36
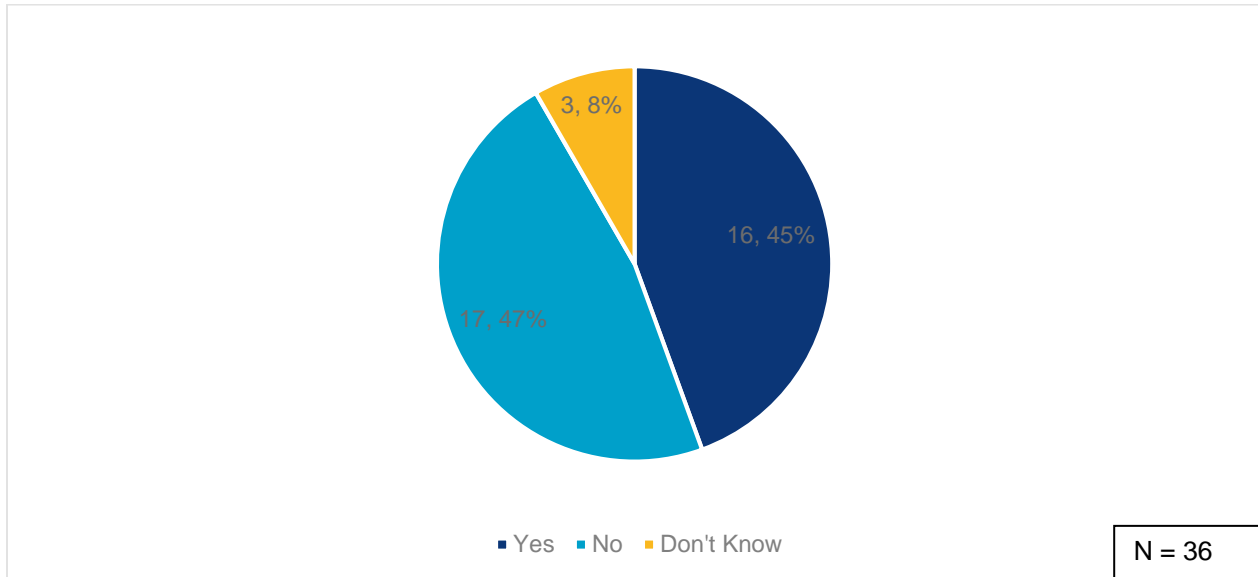
Parent Voice, Collaboration, and Trust

CCSD is fortunate to have a very active core of parents of students receiving special education services. Several parents commented on the coffee hour the former Assistant Superintendent for Pupil Personnel services held at the beginning of the 2020-21 school year. Parents requested more opportunities to meaningfully engage with district administration.

Student Support

Focus groups shared valuable feedback on a variety of topics regarding their experiences as parents of students with disabilities. This section provides a summary of this feedback specific to special education programs.

Service Delivery

During parent focus groups, the following was shared:

- Parents expressed concerns about the delivery of special education supports and services.

- Parents expressed admiration for the special education staff and their outstanding efforts to serve their students.

- Parents expressed appreciation for the effective new phonics-based literacy programs introduced in the elementary grades and felt this would prevent many problems in the upper grades. Parents felt that previously, the word "dyslexia" was never mentioned or programs implemented specifically to address this, but that that was changing and this was a positive change.

- Some parents expressed concern over whether the accommodations on the IEP were in fact implemented and they had to check themselves.

- Some parents felt that they appreciated the full inclusion philosophy but that their child was excluded because of the lack of appropriate services.

Parent Comments on Survey

Parents also had the opportunity to share points of pride and areas for improvement in an open-ended question on the survey. The following sampling of comments emerged from the survey responses and are similar to the topics (listed above) identified in focus groups:

Exhibit 82. Parent Survey: Areas of Strength

- *"They appear to care about our child"*
- *"The school, principal, teachers, and psychiatrist are very helpful. I hope to work with them for a more productive school year! Thank you"*
- *"I have had positive experiences with the special education department. My child has always been supported as needed."*
- *"My son's school is flexible and adapts the IEP as necessary to meet my child's changing needs. The team is communicative and supportive."*
- *"They created a system to help my son prior to the IEP being created to help him."*
- *"I think the teachers and service providers are incredibly caring and thoughtful. They clearly have the child's best interest at heart. [Staff name omitted] in particular has been beyond amazing and we are so lucky to have her on our team."*
- *"They're good with periodically updating their paperwork & having timely IEP meetings. They also put effective plans into action, and teacher feedback is especially valued. (Since the teacher is the one who has the most academic insight on the child's progress)"*
- *"Consistent support /always reachable "*
- *"Communication with a go to person is much improved this year."*
- *"School tried to include everyone in the regular classroom and achieved some level of success."*
- *"Once a plan is in place the providers work hard at helping student achieve goals."*
- *"School and staff offer services within their (and CCSD) resources and reach in their attempt to address student needs."*
- *"Very good at visual schedules to help child with the routine of the school day as well as good visual reminders to assist in academic learning towards the goal of child independence. Very responsive to parent input and requests as well as demonstrate flexibility and take great effort in creating tailored solutions for particular difficulties."*
- *"The special education teacher herself is very competent and carefully works with our child to the best of her ability."*
- *"Incorporating special needs students into mainstream school environment and providing employment training opportunities. It is a good program."*

Exhibit 83. Parent Survey: Areas of Improvement

- *"I think the School should be able to acknowledge a diagnosis of dyslexia or dysgraphia as it seems like these are forbidden words to use in the school district. Acknowledgment could help in a truly transparent discussion of available services in terms of a student's needs."*
- *"Although the special ed teacher has always been in tune with my child's special Learning needs, I have always felt it was important to remind teachers about learning differences that my child has."*
- *"I believe it should be more transparent, I feel like I don't have a clear picture of what goes on day to day and the progress or regressions that take place."*
- *"I believe the younger children in elementary grades need better assessments. Many of the services started to late or weren't enough to catch my daughter up I. The lower grades - she was overlooked - and struggling"*

- *"Despite his iep my son gets no support in his accelerated classes as they are unavailable except in lower level classes. Kids with IEPs can be very smart and should not be penalized for this."*

- *"I think that the best way to help them would be to reassess them from time to time so that if they need the same thing that they are giving them."*

- *"We need co-taught classes in middle school. More trained professionals in general, OG trained, OT, PT. The biggest need is in math, to deal with dyscalculia. We need after school SpEd teachers available to help students as needed. We need a SEPTA. We need a science based reading curriculum for everyone (it will also help SpEd) We need more social workers. We need AIS classes that actually help students."*

- *"I think more after school sessions started earlier in the year so children don't fall behind and then need to catch up"*

- *"More help with homework, more tracking his understanding or material and summer offerings for children who are way behind.*

- *More education should be provided to the parents, especially when starting out at the CPSE level. I am a teacher so I know the in's and out's. However, someone who is not in the field would not know the details of the process. For example, my daughter has an IEP under CPSE for sensory processing disorder. I know that she will not have an IEP when starting K since SPD is not one of the 13 recognized disabilities. I know that my daughter is entitled to a 504 plan to ensure she receives the necessary accommodations. The average parent would not know this."*

- *"There may be a tendency to conflate the needs of children with Autism with the needs of children with other disabilities but particularly those with ADHD and ADD in implementation of interventions in school. Where ADHD is a comorbidity of ASD the conflation is understandable but where there is not that comorbidity it requires that the child with ASD has some interventions particularly targeted for there needs. Many with Autism may require times in the day that they can be in a space with silence and low lighting and very few people in order to decompress and cope with the school day. i.e. a space out of the classroom where sensory stimulation (noise, people, lighting) should be removed as opposed to inputted. Classrooms seems ill-quipped to provide an appropriate space because of the noise / activity level. So on this particular intervention there might be a disconnect between what the IEP mandates (quiet space at anytime the child determines and that should not be earned) and what is actually possible in the school."*

Summary and Implications

The parents of CCSD students are highly engaged and care about their child's school and their child's academic outcomes. Several parents shared favorable statements about the CCSD Special Education Program; this was most notable in the parent survey. Most surveyed parents believe the district responds within a reasonable timeframe. Parents, both during focus groups and in the survey, shared they were pleased with responsiveness, particularly with special education teachers.

CCSD offers several opportunities for parent trainings through the district and the Special Education PTO. Yet, surveyed parents overwhelmingly said they were not aware of the trainings. This may be on account on how the information is shared. It is noted by PCG that information on the CCSD Website is dated and needs to be updated.

Many parents shared they want more information on student progress relative to their IEP. Many parents also expressed concern for a lack of time their child has with the Consultative Teacher.

Through interviews and surveys, some parents felt that they appreciated the full inclusion philosophy but that their child was excluded because of the lack of appropriate services, especially if their child has complex needs.

From Strategy to Execution

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

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

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

Exhibit 84. PCG's Strategy Execution Process
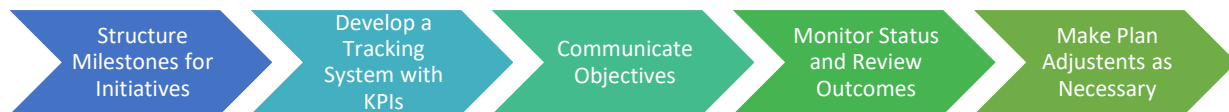
Structure Milestones for Initiatives

Action plans must include concrete, measurable milestones that can be assessed on a regular basis. These milestones break down initiatives into manageable steps and timelines. This structure is essential, especially given the school year cycle and the urgency by which CCSD would like to move these critical initiatives forward.

Develop a Tracking System with KPIs

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

Communicate the Objectives

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

Monitor Progress and Review Outcomes

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

Make Plan Adjustments as Necessary

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

APPENDIX

A. CCSD Staffing Ratios Compared to Other Districts[78][79]

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[78] Sue Gamm, Esq. compiled and continues to maintain this list. She grants PCG permission to use the data in reports.
[79] Districts collect and report data using different methods and different points of time, therefore student headcounts and staffing totals may vary.

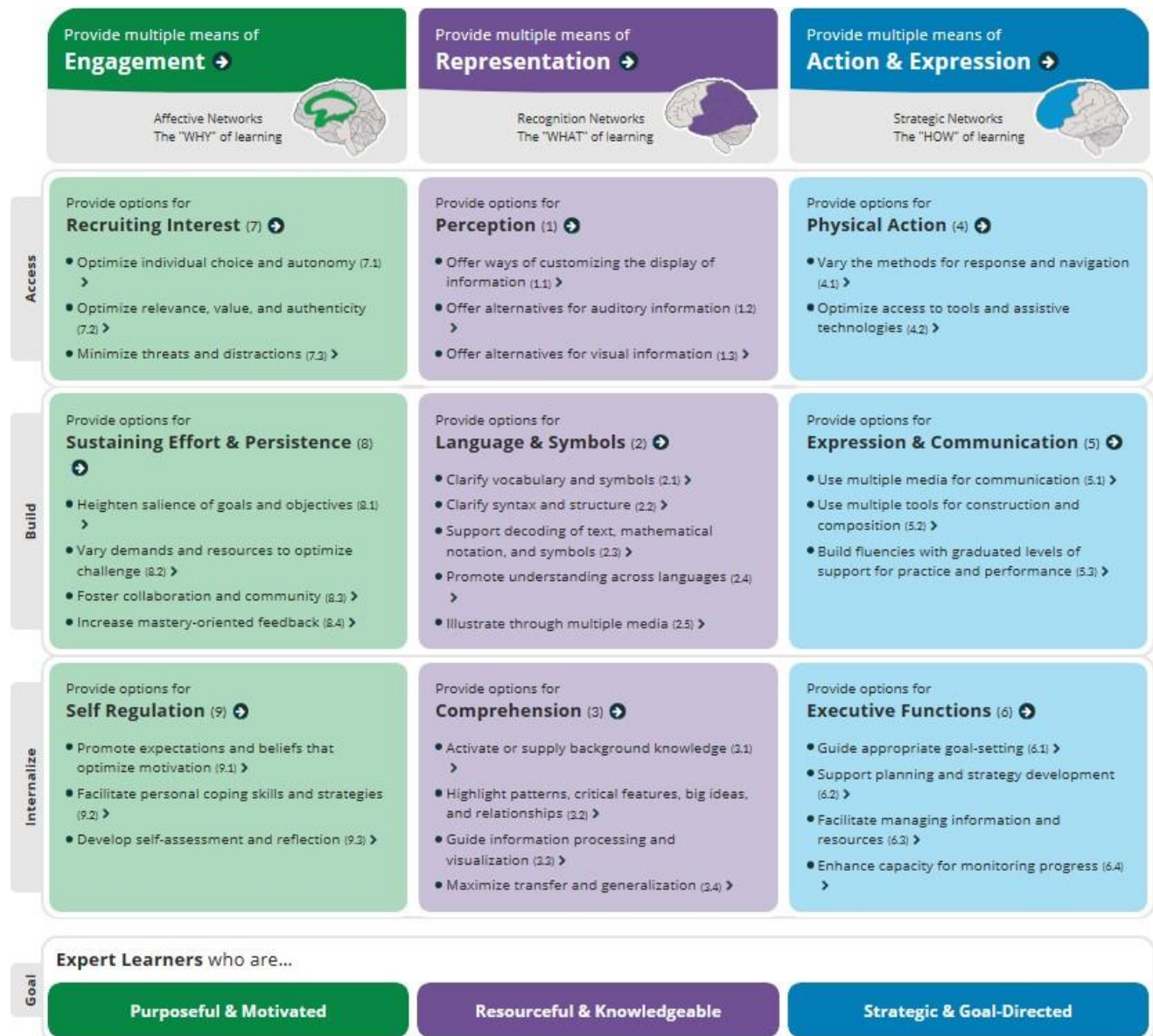| Ratios for Special Educator, Paraeducator, Speech/Lang, and Psychologist	State	Total Enrollment	Incidence		Special Educator			Paraeducator			Speech/Lang			Psychologist		
			% SpEd	SpEd Enr	Number	Sped	All	Number	Sped	All	Number	Sped	All	Number	Sped	All
Agawam Public Schools	MA	4,347	15.1%	656	39	16.8	111.5	100	6.6	43.5	15	43.7	289.8	3	218.7	1449.0
Alexandria City Public Schools	VA	15,105	11.6%	1,754	162	10.8	93.2	151	11.6	100.0	28	62.6	539.5	20	89.0	766.8
Anchorage School Dist	AK	48,154	14.1%	6,779	716.8	9.5	67.2	786.4	8.6	61.2	65	104.3	740.8	44.7	151.7	1077.3
Arlington Pub Sch	VA	26,975	14.1%	3,811	415.7	9.2	64.9	270	14.1	99.9	36.6	104.1	737.0	37.9	100.6	711.7
Atlanta Public Schools	GA	43,443	11.4%	4,950	431	11.5	100.8	224	22.1	193.9	65	76.2	668.4	22	225.0	1974.7
Austin Pub S D	TX	84,676	9.5%	8,062	772.5	10.4	109.6	824	9.8	102.8	70.5	114.4	1201.1	34.6	233.0	2447.3
Baltimore City Publ Sch	MD	82,824	15.5%	12,866	1,121	11.5	73.9	620	20.8	133.6	92	139.8	900.3	NA	NA	NA
Baltimore County P Sch	MD	107,033	11.3%	12,127	1025.4	11.8	104.4	2305	5.3	46.4	187.5	64.7	570.8	85.3	142.2	1254.8
Bellevue SD	WA	18,883	10.3%	1,947	82.7	23.5	228.3	118.6	16.4	159.2	17.4	111.9	1085.2	17.3	112.5	1091.5
Boston Public Schools	MA	54,966	21.0%	11,534	1200	9.6	45.8	800	14.4	68.7	147	78.5	373.9	48	240.3	1145.1
Bridgeport	CT	20,300	12.9%	2,618	204	12.8	99.5	254	10.3	79.9	25	104.7	812.0	33	79.3	615.2
Buffalo Public Schools	NY	46,583	16.6%	7,744	753	10.3	61.9	439	17.6	106.1	109	71.0	427.4	62	124.9	751.3
Cambridge Publ Schools	MA	6,000	20.0%	1,200	176	6.8	34.1	103	11.7	58.3	20	60.0	300.0	22	54.5	272.7
Carpentersville	IL	19,844	15.8%	3,139	227	13.8	87.4	380	8.3	52.2	43	73.0	461.5	28	112.1	708.7
Chappaqua	NY	3,478	11.6%	404	40.5	10.0	85.9	54	7.5	64.4	6.5	62.2	535.1	8	50.5	434.8
Chicago Public Schools	IL	397,092	13.7%	54,376	4,649	11.7	85.4	4,228	12.9	93.9	390	139.4	1018.2	261	208.3	1521.4
Cincinnati Pub Schools	OH	51,431	17.4%	8,928	457	19.5	112.5	801	11.1	64.2	62	144.0	829.5	57.7	154.7	891.4
Clark Cty School Dist	NV	309,476	10.4%	32,167	2,247	14.3	137.7	1,346	23.9	229.9	299	107.6	1035.0	180	178.7	1719.3
Cleve Hts-UnivHtsCty	OH	6,000	18.3%	1,100	83	13.3	72.3	58	19.0	103.4	7	157.1	857.1	8	137.5	750.0
Compton Unified SD	CA	26,703	11.2%	2,981	126	23.7	211.9	118	25.3	226.3	5	596.2	5340.6	14	212.9	1907.4
D.C. Public Schools	D.C	48,991	17.6%	8,603	669	12.9	73.2	653	13.2	75.0	90	95.6	544.3	78	110.3	628.1
Davenport Comm Sch	IA	15,302	12.1%	1,857	188	9.9	81.4	287	6.5	53.3	NA	NA	NA	NA	NA	NA
Deer Valley Unified SD	AZ	36,086	9.1%	3,289	190	17.3	189.9	229	14.4	157.6	49	67.1	736.4	108	30.5	334.1
DeKalb 428	IL	6,249	14.1%	879	58	15.2	107.7	205	4.3	30.5	9	97.7	694.3	7.5	117.2	833.2
Denver Public Schools	CO	78,352	11.7%	9,142	592	15.4	132.4	528	17.3	148.4	94	97.3	833.5	98	93.3	799.5
DesMoines Public Schls	IA	31,654	15.3%	4,854	493	9.8	64.2	358.5	13.5	88.3	37.3	130.1	848.6	11.5	422.1	2752.5
Elgin U-46	IL	40,525	13.1%	5,304	252.8	21.0	160.3	288.5	18.4	140.5	71.9	73.8	563.6	20	265.2	2026.3
ESD 112	WA	13,764	14.4%	1,987	55	36.1	250.3	158	12.6	87.1	20	99.4	688.2	12	165.6	1147.0
Everett Pub Schools	WA	6,100	17.2%	1,049	74	14.2	82.4	51	20.6	119.6	4	262.3	1525.0	5	209.8	1220.0
Fort Worth	TX	79,885	7.7%	6,144	520	11.8	153.6	450	13.7	177.5	73	84.2	1094.3	31	198.2	2576.9
Greenville County	SC	70,282	14.1%	9,894	463	21.4	151.8	376	26.3	186.9	93	106.4	755.7	25	395.8	2811.3
Greenwich	CT	9,048	12.4%	1,124	125	9.0	72.4	142	7.9	63.7	26	43.2	348.0	30	37.5	301.6
Houston Indepen SD	TX	200,568	8.7%	17,489	1,625	10.8	123.4	1,145	15.3	175.2	158	110.7	1269.4	NA	NA	NA
Kalamazoo Pub Schools	MI	12,100	13.8%	1,667	70	23.8	172.9	79	21.1	153.2	15	111.1	806.7	NA	NA	NA
Kent Pub Schools	WA	27,196	11.3%	3,069	148.7	20.6	182.9	318	9.7	85.5	32.3	95.0	842.0	25	122.8	1087.8
Kyrene School District	AZ	17,910	8.6%	1,544	141	11.0	127.0	124	12.5	144.4	27	57.2	663.3	14	110.3	1279.3
Lake Washington	WA	26,864	11.7%	3,145	155.1	20.3	173.2	241.5	13.0	111.2	32.6	96.5	824.0	24.7	127.3	1087.6
Lakota Local	OH	18,500	9.7%	1,800	126	14.3	146.8	120	15.0	154.2	39	46.2	474.4	18	100.0	1027.8
LAUSD	CA	521,880	12.7%	66,236	5,331	12.4	97.9	6,466	10.2	80.7	496	133.4	1051.2	514	129.0	1016.3
Lincoln	NE	1,060	12.1%	128	21	6.1	50.5	21	6.1	50.5	5	25.6	212.0	2	64.0	530.0
Madison Pub Schls	WI	27,185	14.0%	3,808	347	11.0	78.3	448	8.5	60.7	86	44.3	316.1	49	77.7	554.8
Marlborough Pub Sch	NJ	4,835	24.8%	1,198	141	8.5	34.3	115	10.4	42.0	7	171.1	690.7	4	299.5	1208.8
Memphis City	TN	110,863	15.0%	16,637	912	18.2	121.6	655	25.4	169.3	53	313.9	2091.8	58	286.8	1911.4
Miami-Dade	FL	376,264	10.6%	40,012	2,500	16.0	150.5	1,226	32.6	306.9	209	191.4	1800.3	206	194.2	1826.5
Milwaukee	WI	78,533	20.9%	16,406	1281	12.8	61.3	988	16.6	79.5	169	97.1	464.7	136	120.6	577.4
Montgomery Cty Sch	AL	146,812	11.7%	17,226	1,588	10.8	92.5	1,398	12.3	105.0	293	58.8	501.1	97	177.6	1513.5
N. Chicago (in Dist.)	IL	3,803	16.1%	614	39	15.7	97.5	27	22.7	140.9	8	76.8	475.4	5	122.8	760.6
Naperville 203	IL	17982	11.0%	1,978	150	13.2	119.9	237	8.3	75.9	33	59.9	544.9	22	89.9	817.4
New Bedford	MA	12,692	20.9%	2,655	204	13.0	62.2	205	13.0	61.9	26	102.1	488.2	9	295.0	1410.2
Northern Valley RHSD	NJ	2,303	17.8%	410	28	14.6	82.3	30	13.7	76.8	1	410.0	2303.0	3	136.7	767.7
Oak Park Sch Dist 97	IL	5,400	16.2%	875	78	11.2	69.2	90	9.7	60.0	14	62.5	385.7	8	109.4	675.0
Oakland Unified SD	CA	33,312	16.2%	5,401	404	13.4	82.5	175	30.9	190.4	47	114.9	708.8	43.5	124.2	765.8
Pittsburgh Pub Schools	PA	28,000	18.2%	5,096	359	14.2	78.0	252	20.2	111.1	40	127.4	700.0	16	318.5	1750.0
Portland Public Schools	OR	46,596	14.0%	6,513	355	18.3	131.3	535	12.2	87.1	92	70.8	506.5	56	116.3	832.1
Prince William County Schools	VA	90,930	10.1%	9,148	774	11.8	117.5	362	25.3	251.2	67	136.5	1357.2	32	285.9	2841.6
Providence	RI	23,695	18.8%	4,460	340	13.1	69.7	339	13.2	69.9	40	111.5	592.4	28	159.3	846.3
Renton	WA	14,343	14.7%	2,108	129	16.3	111.2	294	7.2	48.8	20	105.4	717.2	15	140.5	956.2
Rockford PS	IL	28,973	14.0%	4,065	336	12.1	86.2	334	12.2	86.7	49	83.0	591.3	24	169.4	1207.2
Round Rock	TX	43,000	7.7%	3,313	369	9.0	116.5	171	19.4	251.5	41	80.8	1048.8	29	114.2	1482.8
San Diego Unified SD	CA	132,500	12.3%	16,300	1,100	14.8	120.5	1,300	12.5	101.9	196	83.2	676.0	129	126.4	1027.1
Saugus	MA	3,012	15.3%	462	28	16.5	107.6	29	15.9	103.9	6	77.0	502.0	NA	NA	NA
Sch Dist of Philadelphia	PA	168,181	20.0%	33,686	1,535	21.9	109.6	610	55.2	275.7	99	340.3	1698.8	100	336.9	1681.8
Scottsdale	AZ	26,544	10.9%	2,891	246	11.8	107.9	230	12.6	115.4	39.4	73.4	673.7	28.4	101.8	934.6
Shelby County (Memphis)	TN	114760	12.7%	14,556	852	17.1	134.7	768	19.0	149.4	55	264.7	2086.5	60	242.6	1912.7
St. Paul	MN	38,086	18.8%	7,152	523	13.7	72.8	536	13.3	71.1	97	73.7	392.6	19	376.4	2004.5
Sun Prairie Area S Dist	WI	6,656	10.5%	697	62	11.2	107.4	93	7.5	71.6	14	49.8	475.4	7	99.6	950.9
Tacoma Pub Schl	WA	32,412	12.0%	3,894	172.5	22.6	187.9	223	17.5	145.3	33.6	115.9	964.6	27	144.2	1200.4
Tucson Unified SD	AZ	56,000	14.5%	8,092	409	19.8	136.9	419	19.3	133.7	61	132.7	918.0	54	149.9	1037.0
Washoe County Dist	NV	63,310	13.5%	8,551	472	18.1	134.1	325	26.3	194.8	77	111.1	822.2	37	231.1	1711.1
West Aurora SD	IL	12,725	13.3%	1,688	120	14.1	106.0	101	16.7	126.0	21	80.4	606.0	13	129.8	978.8
Williamson Cty Schl	TN	31,292	9.0%	2,824	213	13.3	146.9	400	7.1	78.2	34	83.1	920.4	23	122.8	1360.5
Worcester	MA	24,825	20.8%	5,172	254	20.4	97.7	366	14.1	67.8	38	136.1	653.3	NA	NA	NA
Averages			14%			14.5	109.9		15.3	115.0		116.7	861.6		165.5	1,219.0

Ratios for Social Workers, Nurses, OTs & PTs	State	Total Student Enrollment	Total Special Ed	Social Worker			Nursing (School/RN, etc.)			Occupational Therapy		Physical Therapy	
				Number	Ratio To: Sped	All	Number	Ratio To: SpEd	All	Number	Ratio SpEd	Number	Ratio SpEd
Agawam Public Schools	MA	4,347	656	NA	NA	NA	8	82.0	543.4	3	218.7	3	218.7
Alexandria City Public Schools	VA	15,105	1,754	24	73.1	629.4	19	92.3	795.0	4	438.5	1.5	1,169.3
Anchorage School Dist	AK	43,443	4,950	30	165.0	1,448.1	58	85.3	749.0	12	412.5	3	1,650.0
Arlington Pub Sch	VA	43,443	4,950	32.3	153.3	1,345.0	NA	NA	NA	24.4	202.9	5.8	853.4
Atlanta Public Schools	GA	48,154	6,779	NA	NA	NA	112.8	60.1	426.9	21.9	309.5	7.8	869.1
Austin Pub S D	TX	84,676	8,062	21	383.9	4,032.2	68	118.6	1,245.2	19	424.3	13	620.2
Baltimore City Publ Sch	MD	82,824	12,866	193	66.7	429.1	78	164.9	1,061.8	20	643.3	5	2,573.2
Baltimore County P Sch	MD	107,033	12,127	48.7	249.0	2,197.8	179.8	67.4	595.3	65.2	186.0	27	449.1
Bellevue SD	WA	54,966	11534	NA	NA	NA	100	115.3	549.7	67	172.1	17	678.5
Boston Public Schools	MA	18,883	1,947	4	486.8	4,720.8	13.2	147.5	1,430.5	5.3	367.4	5.3	367.4
Bridgeport	CT	20,300	2,618	38	68.9	534.2	28	93.5	725.0	7	374.0	2	1,309.0
Buffalo Public Schools	NY	46,583	7744	48.5	159.7	960.5	NA	NA	NA	75	103.3	29	267.0
Cambridge Publ Schools	MA	6,000	1,200	16	75.0	375.0	0	NA	NA	16	75.0	7	171.4
Carpentersville	IL	19,844	3,139	36.5	86.0	543.7	27.5	114.1	721.6	22	142.7	6	523.2
Chappaqua	NY	3,478	3,478	2	1739.0	1,739.0	7	496.9	496.9	2	1,739.0	1	3,478.0
Chicago Public Schools	IL	404,151	50,566	355.7	142.2	1,136.2	334	151.4	1,210.0	115	439.7	35	1,444.7
Cincinnati Pub Schools	OH	51,431	8,928	NA	NA	NA	NA	NA	NA	19	469.9	5	1,785.6
Clark Cty School Dist	NV	309,476	32,167	NA	NA	NA	173	185.9	1,788.9	68	473.0	29	1,109.2
Cleve Hts-UnivHtsCty	OH	6,000	1,100	7	157.1	857.1	5	220.0	1,200.0	2	550.0	1	1,100.0
Compton Unified SD	CA	26,703	2981	1	2981.0	26,703.0	1	2981.0	26,703.0	1.5	1,987.3	0.5	5,962.0
D.C. Public Schools	D.C	48,991	8,603	90	95.6	544.3	127	67.7	385.8	48	179.2	16	537.7
Davenport Comm Sch	IA	15,302	1,857	NA	NA	NA	7	265.3	2,186.0	NA	NA	NA	NA
Deer Valley Unified SD	AZ	36,086	3,289	NA	NA	NA	37	88.9	975.3	19	173.1	4	822.3
DeKalb 428	IL	6,249	879	8	109.9	781.1	7	125.6	892.7	3.4	258.5	1.3	676.2
Denver Public Schools	CO	78,352	9,142	74	123.5	1,058.8	77	118.7	1,017.6	25	365.7	12	761.8
DesMoines Public Schls	IA	31,654	4,854	25.8	188.1	1,226.9	58.4	83.1	542.0	7	693.4	4.8	1,011.3
Elgin U-46	IL	13,764	1,987	NA	NA	NA	5	397.4	2,752.8	6	331.2	3	662.3
ESD 112	WA	40,525	5,304	56	94.7	723.7	59.5	89.1	681.1	25.2	210.5	4	1,326.0
Everett Pub Schools	WA	6,100	1,049	2	524.5	3,050.0	11	95.4	554.5	2	524.5	3	349.7
Fort Worth	TX	79,885	6,144	NA	NA	NA	106	58.0	753.6	16	384.0	10	614.4
Greenville County	SC	70,282	9,894	20	494.7	3,514.1	132	75.0	532.4	14	706.7	4	2,473.5
Greenwich	CT	9,048	1,124	15	74.9	603.2	23	48.9	393.4	1	1,124.0	NA	NA
Houston Indepen SD	TX	200,568	17,489	26	672.7	7,714.2	25	699.6	8,022.7	17	1,028.8	8	2,186.1
Kalamazoo Pub Schools	MI	12,100	1,667	5	333.4	2,420.0	2	833.5	6,050.0	4	416.8	3	555.7
Kent Pub Schools	WA	27,196	3069	2.2	1395.0	12,361.8	NA	NA	NA	12.8	239.8	4.8	639.4
Kyrene School District	AZ	26864	3145	NA	NA	NA	23.6	133.3	1,138.3	19.3	163.0	3.3	953.0
Lake Washington	WA	17,910	1,544	NA	NA	NA	4	386.0	4,477.5	2	772.0	2	772.0
Lakota Local	OH	18,500	1,800	6	300.0	3,083.3	14	128.6	1,321.4	8	225.0	2	900.0
LAUSD	CA	521,880	66,236	94	704.7	5,552.5	164	402.9	3,174.3	250	264.8	45	1,487.1
Lincoln	NE	1,060	128	5	25.6	212.0	2	64.0	530.0	2	64.0	1	128.0
Madison Pub Schls	WI	27,185	3,808	68	56.0	399.8	38	100.2	715.4	34	112.0	13	292.9
Marlborough Pub Sch	NJ	4,835	1,198	9	133.1	537.2	10	119.8	483.5	4	299.5	2	599.0
Memphis City	TN	110,863	16,637	55	302.5	2,015.7	68	244.7	1,630.3	11	1,512.5	9	1,848.6
Miami-Dade	FL	376,264	40,012	NA	NA	NA	206	194.2	1,826.5	65	615.6	23	1,739.7
Milwaukee	WI	146,812	17,226	NA	NA	NA	NA	NA	NA	112	153.8	61	282.4
Montgomery Cty Sch	AL	78533	16,406	140	117.2	561.0	101	162.4	777.6	30	546.9	13	1,262.0
N. Chicago (in Dist.)	IL	5,400	875	12	72.9	450.0	8	109.4	675.0	7	125.0	1	875.0
Naperville 203	IL	17982	1978	27	73.3	666.0	29	68.2	620.1	4	494.5	3	659.3
New Bedford	MA	12,692	2,655	67	39.6	189.4	30	88.5	423.1	11	241.4	3	885.0
Northern Valley RHSD	NJ	2,303	410	3.7	110.8	622.4	3	136.7	767.7	NA	NA	NA	NA
Oak Park Sch Dist 97	IL	3,803	614	10	61.4	380.3	NA	NA	NA	3.6	170.6	1.6	383.8
Oakland Unified SD	CA	28,000	5,096	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pittsburgh Pub Schools	PA	33,312	5315	19	279.7	1,753.3	30.8	172.6	1,081.6	12	442.9	2	2,657.5
Portland Public Schls	OR	46,596	6,513	10	651.3	4,659.6	NA	NA	NA	20	325.7	9	723.7
Prince William County Schools	VA	90,930	9,148	4	2287.0	22,732.5	NA	NA	NA	22	415.8	9	1,016.4
Providence	RI	23,695	4460	35	127.4	677.0	NA	NA	NA	11.5	387.8	4.5	991.1
Renton	WA	14,343	2,108	0	NA	NA	17	124.0	843.7	15	140.5	3	702.7
Rockford Pub S	IL	28,973	4,065	26	156.3	1,114.3	32	127.0	905.4	12.5	325.2	4.5	903.3
Round Rock	TX	43,000	3,313	NA	NA	NA	1	3313.0	43,000.0	10	331.3	3	1,104.3
San Diego Unified SD	CA	132,500	16,300	NA	NA	NA	129	126.4	1,027.1	40	407.5	10	1,630.0
Saugus	MA	3,012	462	4	115.5	753.0	5	92.4	602.4	2	231.0	1	462.0
Sch Dist of Philadelphia	PA	168,181	33,686	NA	NA	NA	280	120.3	600.6	20	1,684.3	20	1,684.3
Scottsdale	AZ	26,544	2,891	NA	NA	NA	31	93.3	856.3	13.8	209.5	3.8	760.8
Shelby County (Memphis)	TN	114760	14556	66	220.5	1,738.8	79	184.3	1,452.7	29.22	498.2	12.84	1,133.6
St. Paul	MN	38,086	7,152	92	77.7	414.0	33	216.7	1,154.1	36	198.7	12	596.0
Sun Prairie Area S Dist	WI	6,656	697	8	87.1	832.0	1	697.0	6,656.0	5	139.4	2	348.5
Tacoma Pub Schl	WA	32,412	3,894	NA	NA	NA	1.2	3245.0	27,010.0	19	204.9	11	354.0
Tucson Unified SD	AZ	56,000	8,092	26	311.2	2,153.8	53	152.7	1,056.6	10	809.2	4	2,023.0
Washoe County Dist	NV	63,310	8,551	NA	NA	NA	35	244.3	1,808.9	12	712.6	7	1,221.6
West Aurora SD	IL	30,942	4,093	NA	NA	NA	37	110.6	836.3	22	186.0	5	818.6
Williamson Cty Schl	TN	12,725	1688	19	88.8	669.7	7	241.1	1,817.9	11	153.5	7	241.1
Worcester	MA	24,825	5,172	NA	NA	NA	NA	NA	NA	12	431.0	5	1,034.4
Averages					327.5	2,731.0		330.4	2,920.9		420.2		1,069.0

Rank	% IEPs	Special Educators	Paraeducators	Speech/Lang Pathologists	Psychologists	Social Workers	Occupational Therapists	Physical Therapists
**Percentage of Students with IEPs of Total Enrollment & Students with IEPs to Staff Ratio in Ascending Order**							
1	7.7%	6.1	4.3	25.6	30.5	25.6	64.0	128.0
2	7.7%	6.8	5.3	43.2	37.5	39.6	75.0	171.4
3	8.6%	8.5	6.1	43.7	50.5	56.0	103.3	218.7
4	8.7%	9.0	6.5	44.3	54.5	61.4	112.0	241.1
5	9.0%	9.0	6.6	46.2	64.0	66.7	125.0	267.0
6	9.1%	9.2	7.1	49.8	77.7	68.9	139.4	282.4
7	9.5%	9.5	7.2	57.2	79.3	72.9	140.5	292.9
8	9.7%	9.6	7.5	58.8	89.0	73.1	142.7	348.5
9	10.1%	9.8	7.5	59.9	89.9	73.3	153.5	349.7
10	10.3%	9.9	7.9	60.0	93.3	74.9	153.8	354.0
11	10.4%	10.0	8.3	62.5	99.6	75.0	156.2	367.4
12	10.5%	10.3	8.3	62.5	100.0	77.7	163.0	383.8
13	10.6%	10.4	8.5	62.6	100.6	86.0	170.6	449.1
14	10.9%	10.8	8.6	64.7	101.8	87.1	172.1	462.0
15	11.0%	10.8	9.7	67.1	109.4	88.8	173.1	523.2
16	11.2%	10.8	9.7	70.8	110.3	94.7	179.2	537.7
17	11.3%	11.0	9.8	71.0	110.3	95.6	186.0	555.7
18	11.3%	11.0	10.2	73.0	112.1	109.9	186.0	596.0
19	11.4%	11.2	10.3	73.4	112.5	110.8	198.7	599.0
20	11.6%	11.2	10.4	73.7	114.2	115.5	204.9	614.4
21	11.6%	11.5	11.1	73.8	116.3	117.2	209.5	620.2
22	11.7%	11.5	11.6	76.2	117.2	118.0	210.5	639.4
23	11.7%	11.7	11.7	76.8	120.6	123.5	218.7	657.1
24	11.7%	11.8	12.2	77.0	122.8	127.4	225.0	659.3
25	12.0%	11.8	12.2	78.5	122.8	133.1	231.0	662.3
26	12.1%	11.8	12.3	80.4	122.8	142.2	239.8	676.2
27	12.1%	11.8	12.5	80.8	124.2	156.3	241.4	678.5
28	12.3%	12.1	12.5	83.0	124.9	157.1	258.5	702.7
29	12.4%	12.4	12.6	83.1	126.4	159.7	264.8	723.7
30	12.7%	12.8	12.6	83.2	127.3	165.0	299.5	760.8
31	12.7%	12.8	12.9	84.2	129.0	188.1	309.5	761.8
32	12.9%	12.9	13.0	95.0	129.8	220.5	325.2	772.0
33	13.1%	13.0	13.0	95.6	136.7	249.0	325.7	818.6
34	13.3%	13.1	13.2	96.5	137.5	279.7	331.2	822.3
35	13.5%	13.2	13.2	97.1	140.5	300.0	331.3	869.1
36	13.7%	13.3	13.3	97.3	142.2	302.5	365.7	875.0
37	13.8%	13.3	13.5	97.7	144.2	311.2	367.4	885.0
38	14.0%	13.4	13.7	99.4	149.9	333.4	374.0	900.0
39	14.0%	13.7	13.7	102.1	151.7	383.9	384.0	903.3
40	14.0%	13.8	14.1	104.1	154.7	486.8	387.8	953.0
41	14.1%	14.1	14.1	104.3	159.3	494.7	407.5	991.1
42	14.1%	14.2	14.4	104.7	165.6	524.5	412.5	1,011.3
43	14.1%	14.2	14.4	105.4	169.4	651.3	415.8	1,016.4
44	14.1%	14.3	15.0	106.4	177.6	672.7	416.8	1,034.4
45	14.4%	14.3	15.3	107.6	178.7	704.7	424.3	1,100.0
46	14.5%	14.6	15.9	110.7	194.2	1,395.0	431.0	1,104.3
47	14.7%	14.8	16.4	111.1	198.2	1,739.0	438.5	1,109.2
48	15.0%	15.2	16.6	111.1	208.3	2,287.0	439.7	1,133.6
49	15.1%	15.4	16.7	111.5	209.8	2,981.0	442.9	1,169.3
50	15.3%	15.7	17.3	111.9	212.9	NA	469.9	1,221.6
51	15.3%	16.0	17.5	114.4	218.7	NA	473.0	1,262.0
52	15.5%	16.3	17.6	114.9	225.0	NA	494.5	1,309.0
53	15.8%	16.5	18.4	115.9	231.1	NA	498.2	1,326.0
54	16.1%	16.8	19.0	127.4	233.0	NA	524.5	1,444.7
55	16.2%	17.1	19.0	130.1	240.3	NA	546.9	1,487.1
56	16.2%	17.3	19.3	132.7	242.6	NA	550.0	1,630.0
57	16.6%	18.1	19.4	133.4	265.2	NA	615.6	1,650.0
58	17.2%	18.2	20.2	136.1	285.9	NA	643.3	1,684.3
59	17.4%	18.3	20.6	136.5	286.8	NA	693.4	1,739.7
60	17.6%	19.5	20.8	139.4	295.0	NA	706.7	1,785.6
61	17.8%	19.8	21.1	139.8	299.5	NA	712.6	1,848.6
62	18.2%	20.3	22.1	144.0	318.5	NA	772.0	2,023.0
63	18.3%	20.4	22.7	157.1	336.9	NA	809.2	2,186.1
64	18.8%	20.6	23.9	171.1	376.4	NA	1,028.8	2,473.5
65	18.8%	21.0	25.3	191.4	395.8	NA	1,124.0	2,573.2
66	20.0%	21.4	25.3	262.3	422.1	NA	1,512.5	2,657.5
67	20.0%	21.9	25.4	264.7	NA	NA	1,684.3	3,478.0
68	20.8%	22.6	26.3	313.9	NA	NA	1,739.0	5,962.0
69	20.9%	23.5	26.3	340.3	NA	NA	1,987.3	NA
70	20.9%	23.7	30.9	410.0	NA	NA	NA	NA
71	21.0%	23.8	32.6	596.2	NA	NA	NA	NA
72	24.8%	36.1	55.2	NA	NA	NA	NA	NA

B. Universal Design for Learning Principles[80]

Provide multiple means of **Engagement** →	Provide multiple means of **Representation** →	Provide multiple means of **Action & Expression** →
Affective Networks The "WHY" of learning	Recognition Networks The "WHAT" of learning	Strategic Networks The "HOW" of learning

Access

Provide options for **Recruiting Interest** (7) →	Provide options for **Perception** (1) →	Provide options for **Physical Action** (4) →
• Optimize individual choice and autonomy (7.1) › • Optimize relevance, value, and authenticity (7.2) › • Minimize threats and distractions (7.3) ›	• Offer ways of customizing the display of information (1.1) › • Offer alternatives for auditory information (1.2) › • Offer alternatives for visual information (1.3) ›	• Vary the methods for response and navigation (4.1) › • Optimize access to tools and assistive technologies (4.2) ›

Build

Provide options for **Sustaining Effort & Persistence** (8) →	Provide options for **Language & Symbols** (2) →	Provide options for **Expression & Communication** (5) →
• Heighten salience of goals and objectives (8.1) › • Vary demands and resources to optimize challenge (8.2) › • Foster collaboration and community (8.3) › • Increase mastery-oriented feedback (8.4) ›	• Clarify vocabulary and symbols (2.1) › • Clarify syntax and structure (2.2) › • Support decoding of text, mathematical notation, and symbols (2.3) › • Promote understanding across languages (2.4) › • Illustrate through multiple media (2.5) ›	• Use multiple media for communication (5.1) › • Use multiple tools for construction and composition (5.2) › • Build fluencies with graduated levels of support for practice and performance (5.3) ›

Internalize

Provide options for **Self Regulation** (9) →	Provide options for **Comprehension** (3) →	Provide options for **Executive Functions** (6) →
• Promote expectations and beliefs that optimize motivation (9.1) › • Facilitate personal coping skills and strategies (9.2) › • Develop self-assessment and reflection (9.3) ›	• Activate or supply background knowledge (3.1) › • Highlight patterns, critical features, big ideas, and relationships (3.2) › • Guide information processing and visualization (3.3) › • Maximize transfer and generalization (3.4) ›	• Guide appropriate goal-setting (6.1) › • Support planning and strategy development (6.2) › • Facilitate managing information and resources (6.3) › • Enhance capacity for monitoring progress (6.4) ›

Goal

Expert Learners who are...

Purposeful & Motivated	**Resourceful & Knowledgeable**	**Strategic & Goal-Directed**

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[80] CAST (2018). Universal Design for Learning Guidelines version 2.2. Retrieved from http://udlguidelines.cast.org

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