# TABLE OF CONTENTS

I. Introduction and Methodology .................................................................................................................. 2

II. Multi-Tiered System of Supports and Referral/Eligibility for Services .............................................. 6

III. Special Education Demographics ....................................................................................................... 15

IV. Achievement of Students with IEPs .................................................................................................... 24

V. Educational Setting for Students with IEPs ........................................................................................ 33

VI. Teaching and Learning For Students with IEPs ............................................................................ 42

VII. Support for Teaching and Learning ............................................................................................... 55

VIII. Recommendations .......................................................................................................................... 77

Appendices .................................................................................................................................................. 87
I. INTRODUCTION AND METHODOLOGY

Introduction

Located directly outside of Boston, Milton is a diverse suburban community with four elementary schools, one middle school, and one high school. Of the district’s roughly 4,000 students, 14% receive special education services.

As a district, MPS has invested in strong educational and enrichment programming. The district offers a developmental preschool, before and after school programs and summer school programs. All six of the district’s buildings have been rebuilt or updated to state-of-the-art facilities. The district is particularly well known for its two distinct educational pathways offered to students in grades 1-5: English Innovation and French Immersion.

MPS offers a range of special education programs and services designed to prepare all students with disabilities for postgraduate success. In an effort to improve the effectiveness and efficiency of the special education program, Milton Public Schools (MPS) contracted with Public Consulting Group (PCG) in June 2015 to provide an in-depth analysis of the district’s special education services, staffing, organizational structure, and processes. Over the course of the eight month engagement, PCG conducted a review of MPS special education data, held focus groups with a range of MPS special education stakeholders, and visited all six MPS schools. The following report provides an overview of the MPS special education program and details recommendations for programmatic improvements, designed to drive programmatic efficiency and lead to better outcomes for students and families.

Organization of the Report

This report is organized by six major themes:

1. MTSS & Referral/Eligibility for Services
2. Special Education Demographics
3. Achievement of Students with IEPs
4. Educational Settings for Students with IEPs
5. Teaching & Learning for Students with IEPs
6. Support for Teaching & Learning

Recommendations are summarized at the end, with detailed steps for implementation. In addition, an explanation of frequently used terms is in Appendix D.

Throughout this report, references are made to students receiving special education services. They will also be referred to as students with Individualized Education Programs (IEPs) or students with disabilities. The terms are intended to be interchangeable.

Methodology

In the following review, findings and recommendations related to programs, policies and practices resulted from a comprehensive analysis of three data sources. The first component involved the analysis of student outcomes, achievement trends, and growth patterns at the elementary, middle, and high school levels (Outcome Analysis). The second component focused on the systemic organizational and program factors that have an impact on program effectiveness and exceptional student outcomes (Organizational and Program Analysis). The analyses conducted for these two components drew from the third component, the Research and Practice Literature. The literature identifies the organizational factors, the program elements and practices, and the implementation conditions associated with program effectiveness and positive student outcomes.
Our review approach was multidimensional, emphasized the participation of multiple stakeholders, and involved qualitative data collection approaches.

Components included:

1. An analysis of student outcomes data
2. Interviews and focus groups with a sample of district and school personnel
3. Classroom observations
4. A review of district documents pertinent to the focus of the study

A critical component of this study was to determine how Milton Public Schools’ special education program compares to similar districts. PCG partnered with MPS to identify comparable districts. PCG used publically available information to analyze key MPS special education statistics against these districts. PCG also drew upon our own knowledge of other districts’ policies and procedures when making recommendations for best practice.

ELEMENTARY SCHOOL CHOICE IN MILTON

All MPS families have the opportunity to choose between the district’s educational pathways at the end of kindergarten, deciding between the English Innovation pathway in which Science, Technology, Engineering, and Math (STEM) is woven throughout the curriculum and French Immersion pathway which provides teaching in French across all subject areas. The French Immersion enrollment is capped to ensure relatively equivalent allocation of students and resources. The district makes an effort to place each student in their desired pathway. All four elementary schools offer both programs. If the requested program is full at the school the student is assigned to attend based on his/her home address, parents have the opportunity to send their child to another elementary school with space available in the program.

Students in the English Innovation Pathway are taught all content and skills in English. These students also receive one period per week of Spanish instruction and receive STEM instruction through the STEM Innovation Challenge program. The goal of the English Innovation Pathway is to teach the fundamental skills needed for success in all disciplines, while providing an enhanced STEM program in grades 1-5.

Students in grade one French Immersion receive instruction entirely in French for Language Arts, Math, Science, and Social Studies. As student’s progress through the program, instructional time in English increases at each grade level. By 5th grade, 70% of the student’s instructional day is in English. The goal of the French Immersion program is to teach the fundamental skills needed for success in all disciplines, while developing proficiency in oral and written French. French is taught through curriculum instruction instead of being taught as a separate subject.

POPULATION TRENDS AND OUTCOME ANALYSES

Student Population and Program Placement Trends

Population and program placement trends are significant equity indicators of the extent to which there is over-representation of any group in the special education population, and they also provide important information about the distribution of the special education population in placements that represent least restrictive environments. Population trends were analyzed to show, where possible, changes over time by grade level/age, disability categories, level of service, and diversity categories (gender, race/ethnicity, and language where the number of students is sufficient to allow analyses), and combinations of variables.

Student Achievement Trends

Student performance data were analyzed to provide a comparative examination of performance by both special and regular education students.
DOCUMENT REVIEW

PCG reviewed numerous documents and analyzed them for information related to district and school structures, programs, policies and practices. Data and documents reviewed were in the following general categories:

- Quantitative data
- Description of services and activities
- Documents regarding accountability and professional development
- District procedures and guides
- Massachusetts Department of Elementary and Secondary Education Special Education reports

More specific information about data and documents is provided in Appendix B.

INTERVIEWS & FOCUS GROUPS

Extensive data were acquired through interviews and focus groups with central office administrators, school level administrators, special education teachers, general education teachers, special education facilitators, school principals, parents, students, school committee members, Special Education Parent Advisory Council (SEPAC) members, and other school-based personnel.

More specifically, central office administrators included the Superintendent of Schools, the Assistant Superintendent for Curriculum and Human Resources, the Assistant Superintendent for Business Affairs, the data and technology team, the Director of World Languages, and the Director of Pupil Personnel Services. Focus groups included principals, team chairpersons, special education teachers, parents, adjustment and guidance counselors, school psychologists, related service providers, curriculum coordinators, general education teachers, special program staff, and co-teaching teams.

STUDENT RECORD CONFIDENTIALITY

To protect the confidentiality of personally identifiable student information, PCG complied with the Institutional Review Board’s procedures, the Common Rule, the Family Educational Rights and Privacy Act, the Health Insurance Portability Act, and other state, local, and federal rules for the protection of such confidentiality. The company’s Security and Confidentiality Policy for Protected Data is fully described in Appendix A.

Acknowledgements

The PCG team thanks the many individuals who contributed to this review of MPS’ special education practices. Their efforts were critical to our ability to obtain a broad and detailed understanding of the system so that we could present the best possible proposals for improving special education and related services for the district’s students. This review would not have been possible without the contributions of Mary Gormley and Tracy Grandeau. They organized the team’s interviews and provided the documents and data we needed in order to do our work.

PCG thanks the many MPS staff members with whom we met for focus groups and interviews. Their dedication to improving services, programs, and outcomes for all students was evident in each of our sessions. We also thank the SEPAC, parents and school committee members who gave up their time to provide us with crucial information, allowing us to obtain a complete picture of MPS’ special education and general education program. We appreciate the thoughtfulness each parent, teacher, administrator, and community member devoted to this project in an effort to ensure that all Milton children have access to an education that allows them to reach their full potential.

Finally, although this report documents areas of concern, PCG acknowledges the many successes, improvements, and achievements of MPS that are detailed throughout this report. The areas of concern are used to formulate
recommendations designed to improve the academic performance and social/emotional outcomes of students with disabilities, who as a group have traditionally lagged behind some of their high performing peers. PCG’s goal is to assist the district in taking a series of actions that are challenging but intended to ensure the district can abide by its commitment to prepare each student for postgraduate success after the conclusion of their MPS educational career.

MEMBERS OF THE PCG TEAM

Appendix C presents brief biographical sketches of PCG’s team members, who include:

- **Anna d’Entremont**, PCG Senior Consultant and former COO of a Boston, MA charter school and program officer for an organization supporting 85 new small high schools across New York City
- **Dr. Jennifer Meller**, PCG Senior Consultant and former Director in Specialized Services for the School District of Philadelphia
- **Alexandra Panetta**, PCG Business Analyst and Data Analyst
- **Annelise Eaton**, PCG Business Analyst and Data Analyst
II. MULTI-TIERED SYSTEM OF SUPPORTS AND REFERRAL/ELIGIBILITY FOR SERVICES

This section reviews the effectiveness of the District’s pre-referral activities, including the adoption of a tiered system of supports for students, and the impact of these activities on referrals to special education. A more detailed overview of Multi-tiered System of Supports (MTSS), and its relationship to both special education and 504 services, is also provided.

Relationship between MTSS Framework, Section 504 Services, and Special Education

The following information explains the relationship between the MTSS framework, Section 504 services, and IDEA’s special education services.

MTSS FRAMEWORK

MTSS provides an overall framework for structuring and coordinating the provision of core instruction along with the additional support some students require so that all are successful. The holistic nature of the MTSS framework requires the consideration of all students, including those with Section 504 and IEP plans, and others who are ELL and/or academically advanced.

Under the MTSS framework, core instruction is evidence-based, rigorous and of high quality. By utilizing a universal design for learning, learning differences are considered proactively rather than reactively. The instruction is culturally relevant and linguistically appropriate, and is implemented with integrity for all students. The framework is based on a presumption that some students require additional instruction in order to achieve grade level standards. Increasingly intensive tiers of academic and social/emotional support are targeted to meet student needs based on data-driven 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.

The MTSS process includes the following eight components:

1. Robust and valid core instruction;
2. The use of problem solving to match instructional resources to educational needs;
3. Universal screening;
4. The use of three tiers of increasingly intensive instructional supports and strategies;
5. Progress monitoring;
6. Professional development to ensure fidelity of implementation;
7. A clear system of accountability; and
8. The engagement of parents.

SPECIAL EDUCATION SERVICES

With effective implementation of the MTSS framework, including the early identification of students when they are first having academic and/or social/emotional difficulties, it is likely that fewer students will present a need for a

---

1 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.
referral for special education services. In some cases, progress monitoring will provide data to suggest a need for special education.

Under the MTSS framework, special education is not considered to be a separate tier for instruction and intervention. Instead, it is viewed as a service delivery model that is integrated within the tier(s) of instruction/intervention and matched to a student's skill needs. In most cases, the student's IEP incorporates these interventions, and identifies the personnel and educational setting (general education and/or separate) in which they will be provided. In some cases, the student’s need for interventions will not be related to his/her disability and will be provided as determined by the problem-solving team.

SECTION 504 SERVICES

Students with Section 504 plans may require instruction/intervention that is provided through one or more of MTSS's increasingly intensive tiers. At any point during the MTSS process, a student may be referred to determine whether he/she has a disability that meets Section 504 criteria.

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The graphic below reflects how MTSS, Section 504 services and special education services intersect.

**Figure 2.1. Multi-Tiered System of Support (MTSS)**

**Multi-Tiered System of Support (MTSS)**

- **Tier 1: Core, Universal Instruction & Support**
  - General academic/behavior instruction and support provided to all students in all settings.

- **Tier 2: Targeted, Supplemental Interventions & Support**
  - More targeted instruction/intervention and supplemental support in addition to and aligned with the core academic and behavior curriculum.

- **Tier 3: Intensive Interventions & Supports**
  - The most intense (increased time, narrowed focus, reduced group size) instruction and intervention based on individual and small group student needs provided in addition to and aligned with Tier 1 & 2 academic and behavior instruction and support.

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**Massachusetts Tiered System of Support**

Massachusetts, like many states, has embraced a framework for a tiered system of supports that is responsive to the academic and non-academic needs of all students, including those who may require or currently receive special education services. The Massachusetts Tiered System of Supports (MTSS) provides: a framework for school improvement that focuses on system level change across the classroom, school, and district to meet the academic and non-academic needs of all students, including students with disabilities, English language learners, and students who are academically advanced. It guides both the provision of high-quality core educational experiences in a safe and supportive learning environment for all students and academic and/or non-academic targeted interventions/supports for students who experience difficulties and for students who have already demonstrated mastery of the concept and skills being taught.\(^3\)

While the state does not mandate adoption of this framework, it is encouraged and is provided as guidance for best practice. MPS has not adopted the state’s MTSS framework as a district-wide policy. The district does, however, have numerous academic and non-academic supports in place to support students who may be struggling prior to a special education referral.

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\(^3\) [http://www.doe.mass.edu/sped/mtss.html](http://www.doe.mass.edu/sped/mtss.html)
General Education Supports

The foundation of MTSS is a high-quality general education core curriculum that provides all students with opportunities for increased learning. Through a universal design for learning, barriers are reduced or removed for diverse populations of learners, including students with disabilities. Students at risk for learning difficulties are provided with a series of increasingly intensive, individualized and research-based interventions, and data are collected to assess progress over time.

As noted above, a strong MTSS framework includes both an emphasis on instruction and behavior. Response to Invention (RTI) is often the strategy that districts use to address the academic component of the MTSS framework. While there is no formal district-wide RTI framework in Milton, it is a practice that was adopted by the District several years ago and components of the practice exist in several of the District’s elementary schools. Implementation across the District is currently “patchwork” and the model varies “building by building.” Across the board, it was the general belief by focus group participants that the Tucker Elementary School currently has the most robust system in place. As one participant noted, “everyone informally aspires to the notion of RTI,” but “there is no shared language among schools.”

In general, there was an expressed eagerness by teachers, principals and District administrators for strengthening of the current program. Some focus group participants, however, indicated they did not see as strong of a need for RTI given other general education academic supports in place, such as the use of reading specialists, flexible grouping and team teaching. Under a comprehensive MTSS framework, it should be noted, these activities, along with those targeted to students’ social-emotional support through PBIS (Positive Behavioral Intervention and Supports) and bullying prevention initiatives, would be considered part of the framework and targeted to student need.

As MPS works to formalize their RTI process, the District should align these practices to the more comprehensive and systemic MTSS framework adopted by the Commonwealth of Massachusetts. The MTSS-related recommendations included at the end of this report are designed to improve achievement, address the social/emotional needs of all students, and ensure that needs are met for students not eligible for special education services.

LEADERSHIP AND STAFFING

At the District level, the duties of the Assistant Superintendent for Curriculum and Instruction should be clarified to ensure that this position serves as the district advocate of MTSS/RTI. While principals have taken responsibility for the RTI initiative in their individual buildings, they expressed uncertainty about where to look for District level support and guidance. Centralization of both assessments and interventions would promote a more streamlined and efficient process, as would consistency among MTSS intervention teams at each school. These actions would also ensure consistency of experience when students move between schools.

The position of Assistant Superintendent for Curriculum and Instruction is best situated to lead this charge. A District level staff person, who is associated with general education, should be assigned responsibility to oversee MTSS at the District level. The Pupil Personnel Office has significant expertise with the systems needed for a successful MTSS implementation, and should be consulted as a partner in this endeavor. MTSS/RTI is not a special education initiative, and should not be run out of the Pupil Personnel Office.

The current school-based staff, at least at the elementary level, appears sufficient for implementation of this approach. Roles will need to be redefined. Staff will need professional development to ensure they have a solid understanding of their new role. As one focus group member noted, “It’s a question of knowledge and training, not resources.”
UNIVERSAL SCREENING

Three years ago, the Advancement budget sought to provide common assessments throughout the District. Curriculum coordinators work with teachers to facilitate assessments. Based on these assessments, students participate in weekly targeted classroom instruction based on flexible grouping.

INTERVENTIONS

There is a role for improved professional development with regard to targeted interventions for various areas and intensities of need. Teachers described developing their own classrooms interventions or relying on colleagues to share ideas, rather than leveraging District supported practices. Teachers did stress that access to materials was not an issue, but knowing what were the most appropriate interventions to use and when for a student’s specific learning profile.

Reading intervention is considered the strongest in early grades. The District hired elementary reading specialists six years ago, and now has six specialists across the District who provide direct support to students in both English and French. The reading specialists work collaboratively with general education and special education teachers. There was the perception that this support is strongest in grades 1 and 2, and was most available for students who are struggling in the English Innovation Pathway.

Reading Intervention Specialist assignment distribution varies quarterly based on student need. At the time of this report, the distribution was as follows:

- 1 English reading specialist shared by Collicot/Cunningham
- 1 English reading specialist shared by Glover/Tucker
- 1 District-wide 3rd grade reading specialist
- 1 District-wide 4th and 5th grade reading specialist
- 2 District-wide French Immersion reading specialists

Tucker Elementary School has an additional math specialist funded through Title 1 who provides targeted supports for 1st and 2nd grade. No other elementary schools receive Title 1 funds. Pierce Middle School and Milton High School also each have a reading specialist who provides targeted reading support. Readers Workshop, Writer’s Workshop and Imagine It Phonics are currently offered for all students as part of the core curriculum in grades K-5. These programs offer differentiated learning opportunities for students.

MPS intervention practices are included in the figure below. While the language of “Tiers” is not currently used in the District, they have been included to help identify potential academic support gaps in an MTSS framework.
### Figure 2.2 MPS Interventions by Grade

<table>
<thead>
<tr>
<th>Name of Intervention</th>
<th>Tier</th>
<th>Description</th>
<th>Grade K</th>
<th>Grade 1-3</th>
<th>Grade 4-5</th>
<th>Grade 6-8</th>
<th>Grade 9-12</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lively Letters</td>
<td>3</td>
<td>Reading program for students who are below grade level or on IEPS</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Words Their Way</td>
<td>3</td>
<td>Vocabulary program for students who are below grade level or on IEPS</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reader’s Workshop</td>
<td>1</td>
<td>Reading program for all students</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Imagine It Phonics</td>
<td>1</td>
<td>Reading program for all students</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Writer’s Workshop</td>
<td>1</td>
<td>Writing program for all students</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Math Investigations</td>
<td>2</td>
<td>Students are selected based on previous year’s math performance and standardized test scores</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Reading Instruction</td>
<td>2</td>
<td>Reading specialist meets with students as determined by staff, mix of instructional methods (For middle school level, selection is made based on Scholastic Reading Inventory Scores which are administered via English class at the beginning of the year)</td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Read Naturally</td>
<td>3</td>
<td>Students are selected based on SRI testing (administered in ELA classes at the beginning of the year) and standardized ELA test scores</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lexia</td>
<td>3</td>
<td>Students are selected based on SRI testing (administered in ELA classes at the beginning of the year) and standardized ELA test scores</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>SRA Corrective Reading</td>
<td>3</td>
<td>Students are selected based on SRI testing (administered in ELA classes at the beginning of the year) and standardized ELA test scores</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>
Gafi Reading Program | 2 | Reading program for grade 1 and 2 French immersion students | X |

Francais Facile Method | 1 | Reading, phonetic, and kinesthetic program for Grade 1 and 2 French immersion students | X |

Zig-Zag Method | 1 | Reading program for grade 3 and 4 French immersion students | X | X |

Francophone Reading Specialists | 3 | Specialists in all elementary school programs | X | X |

PROGRESS MONITORING

While there were anecdotal reports of informal data collection activities for progress monitoring and an acknowledgement by many that the District is becoming more “data-driven,” there does not appear to be a systemic approach for the collection of progress monitoring data. Many focus group participants expressed uncertainty about what they were supposed to be collecting and in what format.

COMMUNICATION AND CONSISTENCY

It was identified in multiple focus groups that there is suboptimal communication and consistency between schools regarding the RTI process. There is no RTI manual. Groups stated that there were not common processes or forms across schools. School-based focus group participants noted differences in expectations of the RTI process, and differences in documentation that made it difficult to follow the course of a student's intervention support in another school or in a previous grade. All indicated that a standard form and additional training would be welcome. Additionally, while information on the district website related to core instruction is rich, there appears to be no mention of RTI or interventions for struggling learners.

SOCIAL/EMOTIONAL SUPPORTS

The District has health education and other curriculum programs in place at the high school and middle school that include Social Emotional Learning. At the elementary level, the district Bullying Prevention Advisory Council (BPAC), which previously developed the CHoRR curriculum, assisted in the implementation of a new K-5 program, Bully-Proofing Your School. This has been successfully implemented for approximately 2 years. A Social Emotional Learning Curriculum team of teachers and administrators recently reviewed SEL curricula and have made a recommendation that the District also implement the Second Step SEL program in PreK-5. The District plans to partially implement the program this year with full implementation in the next school year.

In addition, every school has at least 1 School Adjustment Counselor. Secondary schools also have guidance counselors. Professional development has been provided in social skills groups and interventions, Functional Behavior Analysis, and Positive Behavior Intervention Plans.
Referral, Evaluation & Qualification for Special Education

REFERRAL TO SPECIAL EDUCATION

Every school in the District has a Student Support Team (SST). If teachers suspect a student may have additional needs, they will refer the student to this group. While any student having academic or non-academic difficulties may be discussed, SST is considered the first step in the identification process for students suspected of having a disability. SST has further responsibilities, specifically functioning as the RTI team. This dual role leads to the misconception that RTI is the pathway to special education. Furthermore, in most schools in the district, SST does not appear to be a group designed to discuss ongoing interventions, review progress, monitor data, or offer further/follow up suggestions for assisting the student in the general education setting.

The composition and structure of the Student Support Team varies by school. Typically the SST is led by the school adjustment counselor, with team membership including the special education chair, the teacher and an administrator. Most schools meet weekly, with a few meeting with less frequency. Many of the concerns expressed by focus group participants pertain to issues relating to lack of clarity over the District’s SST process, particularly for students in the French program, and how the SST relates to RTI.

It does not appear that the District makes detailed mention of SST on its website, or explains how it might be used to provide interventions in the general education classroom, how it intersects with a possible referral to special education, or how it might be used to identify the criteria for various disabilities. Easy access to this information could support reasonable expectations and understanding of these terms and processes.

TIMELY EVALUATIONS

Based on ESE data from the 2010-11 school year, 96.7% of MPS students were evaluated by mandated timelines. The state target is 100%. While there are hand created reports for student level tracking, more recent data on overall evaluation timelines was not easily accessible from the district’s current data reporting tools. This data should be more accessible to the district given that it is a required state performance plan indicator. In the 2014-15 school year, MPS conducted initial evaluations for 226 students, of which 40%, or 90 students, were found eligible.

SECTION 504 ELIGIBILITY

Overall 4.1% of students or 178 students at MPS have a 504 Plan. As noted in the chart below, the middle school has the highest percent of their population on 504 plans. The middle school also has the largest number of students receiving 504 accommodations—there are 58 elementary school students, 74 middle school students and 36 high school students with a 504 Plan in the district. Of the 36 high school students with a 504 plan, 15 are 9th graders.
Prior to the PCG review, 504 data was not captured in a consistent manner in the District’s special education data management system.

There is the perception in the District that the number of students with a 504 Plan is “high” and is “on the rise”. Some staff noted legal clarification by the school attorney a few years ago about the impact of the reauthorized Americans with Disability Act (ADA) and Section 504 accommodations on the schools resulting in an “overly cautious” approach by teachers with 504 referrals. According to the School Committee report, “Addressing the Achievement Gap in Special Education” from October 2014, the number of students with 504 plans has risen in the past few years. The number of students with a 504 plan in 2012 was approximately 28, which was less than 1% of the total MPS student population. The following year the number rose to 72, which was 1.8% of the total MPS student population. By 2014, the total was 178, or 4.3% of the total MPS student population. Focus group participants expressed a desire for greater clarity in District policy and more explicit professional development on Section 504 accommodations.

Some parent focus group participants also noted confusion related to Section 504 and wanted improved access to information. The District has posted a “Parent’s Rights” brochure on their special education webpage but there is limited additional online discussion of Section 504 or the Americans with Disability Act (ADA). A more in-depth and detailed description is found in each of the schools’ student handbooks. This same information could be posted on the District website to provide further communication for families.

Figure 2.3. Percent of MPS Students on 504 Plans by School, 2015-16

<table>
<thead>
<tr>
<th>School</th>
<th>Percent of MPS Students on 504 Plans</th>
</tr>
</thead>
<tbody>
<tr>
<td>Milton High School</td>
<td>3.6%</td>
</tr>
<tr>
<td>Pierce Middle School</td>
<td>8.2%</td>
</tr>
<tr>
<td>The Tucker School</td>
<td>2.1%</td>
</tr>
<tr>
<td>The Glover School</td>
<td>3.6%</td>
</tr>
<tr>
<td>Cunningham Elementary</td>
<td>2.2%</td>
</tr>
<tr>
<td>Collicot Elementary</td>
<td>2.5%</td>
</tr>
</tbody>
</table>

Because there is no federal requirement to collect data on how many students have 504 plans, there is limited comparative data. A national survey in 2008 found that 1.2% of students on average nationally had 504 plans.

III. SPECIAL EDUCATION DEMOGRAPHICS

This section provides context for special education programming by reporting special education prevalence rates based on various subgroups of students, including race, ethnicity, gender, and disability type.

Based on 2015-16 state data, 14.2% of MPS students ages 6-21 have an IEP, compared to 17% of those across the Commonwealth and 13.1% in the nation. The following discussion addresses data pertaining to the overall percentage of students with IEPs based on total student enrollment and disability area, comparisons to state and national data, and composition by race/ethnicity. This information provides an overall context for understanding the disparate characteristics of students who receive special education services.

Overall Rates for Students with Disabilities

As reflected in Chart 2.0, the percentage of MPS students with IEPs has remained about the same since the 2011-12 school year, with small fluctuations between 13.7% and 14.9% over the past five years. For the past five years, MPS’ percentage of students with disabilities has remained below the statewide average (17.1%).

Figure 3.1. Percentage of MPS Students with IEPs Compared to State Incidence Rates, 2011 to 2015

MPS IEP RATES COMPARED TO COMPARABLE SCHOOL DISTRICTS

Compared to five similar school districts in Massachusetts, MPS’ state reported IEP rate for the 2014-15 school year was 13.3%. This rate is comparable to Burlington (13.2%), Canton (12.9%), and Sharon (12.8%), and lower than Walpole (15.3%) and Easton (16.4%).

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6 Data reported to the state is from a different source than internally supplied data and may represent a different snapshot in time, leading to differing percentages.
Figure 3.2. MPS IEP Rates Compared to Other Massachusetts School Districts, 2014-15

<table>
<thead>
<tr>
<th>School</th>
<th>Percent of Students with IEPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Milton</td>
<td>13.3%</td>
</tr>
<tr>
<td>Burlington</td>
<td>13.2%</td>
</tr>
<tr>
<td>Canton</td>
<td>12.9%</td>
</tr>
<tr>
<td>Easton</td>
<td>16.4%</td>
</tr>
<tr>
<td>Sharon</td>
<td>12.8%</td>
</tr>
<tr>
<td>Walpole</td>
<td>15.3%</td>
</tr>
</tbody>
</table>

Statewide Percent of Students with IEPs: 17.1%
Overall Incidence Rates by Primary Disability Area

As is reflected in chart 3.3, MPS has a much lower rate of specific learning disabilities (16.2%) than both the state (25.7%) and the nation (36.0%). MPS also has a slightly lower rate of intellectual disabilities (4.6%) than both the state and the nation (5.4% and 6.8%, respectively).

Compared to the state and nation, MPS has a higher rate of autism (11.4%) than the state’s 10.5% and the nation’s 7.1%. The rate of communication disabilities (19.1%), developmental delay (6.5%), emotional disabilities (7.6%), and health disabilities (12.3%) in MPS falls between the percentage in the state and the percentage in the nation.

Figure 3.3. Percentage of MPS Students by Disability Area Compared to State and Nation, 2014-15

7 The area of “other” incorporates the following disability areas: sensory, physical, neurological, and multiple disabilities


Overall Incidence Rates by Race/Ethnicity

The information below reflects data for MPS students who receive special education services by race/ethnicity, to consider the extent to which there is disproportionality.

Figure 3.4 & 3.5. Percent of Students with IEPs by Race/Ethnicity Compared to District Overall, 2015-16

The percentage of white, African American, and Asian students with IEPs differs from the percentage of students in each of these racial groups in the overall student population. Key differences include:

- White students represent 73% of the entire student population but only 65% of students with IEPs.
- African American students represent 17% of the entire student population and 28% of those with IEPs.
- Asian students represent 6% of the entire student population and slightly less than 4% of students with IEPs.

White students make up the majority of students with IEPs (65%), followed by African American students (28%) and Asian students (4%). White students also make up the majority of students in Milton’s overall population (73%), followed by African American students (17%) and Asian students (6%). African American students are receiving special education services at a rate higher than their prevalence in the general population.
Overall, 14% of Milton students have IEPs. The percentage of African American students with IEPs is much higher at 25%. 16% of Hispanic students have IEPs, which is slightly higher than the district average.

In certain cases, the prevalence of disability types varies by race. Key differences, displayed in the chart above, include:

- **White** students represent 65% of students with IEPs, but only 52% of those with communication disabilities and 55% of those with intellectual disabilities. White students are more often identified with a developmental delay (80%) and neurological disabilities (75%).
- **African American** students represent 28% of students with IEPs, but only 18% of those with a developmental delay. African American students are more often identified with intellectual disabilities (41%) and communication disabilities (34%).

9 “Other” includes neurological, sensory/visual, physical, sensory deaf/blind, and multiple disabilities
- Asian students represent 4% of students with IEPs and 10% of students with communication disabilities.

**STATE PERFORMANCE PLAN INDICATORS BY RACE/ETHNICITY**

The Massachusetts Department of Elementary and Secondary Education measures disproportionate representation, i.e., over-identification/under-identification, by computing a weighted or alternate risk ratio and examining the appropriateness of the district’s special education policies, procedures and practices. This allows the Department to determine whether the percentage of students of a given subgroup in special education was the result of inappropriate identification. Based on 2014-15 data, MPS was found to be in compliance with Indicator 9, Disproportional Representation in Special Education. While no disproportionality was found, given the above percentages, the District should continue to ensure special education policies, practices and procedures support appropriate identification of all students.

**Overall Incidence Rates by Grade**

**Figure 3.8. Percent of Students Receiving Special Education by Grade, 2015-16**

As is displayed in the chart above, the percentage of students with disabilities is highest in 3rd, 5th, and 12th grade, based on data from the 2015-2016 school year.

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Over the past five years, the percentage of students receiving special education services has declined between kindergarten and first grade, with a more subtle decrease between 1st and 3rd grade. The percentage of students receiving services increases slightly in middle and high school.

The chart above compares the percentage of students with IEPs in the English Innovation program to the percentage of students with IEPs in the French Immersion program. At every grade level, there is a smaller percentage of students with disabilities in the French Immersion program than the English Innovation program. This trend continues in the upper grades. The percentage of students with IEPs in the French Immersion program increases significantly between second and third grade, when students move from a completely French program to a program with instruction in both French and English.
STUDENTS BY DISABILITY TYPE AND GRADE

In every grade in MPS, there are students with autism and communication disabilities. The data show the highest rates of communication disabilities from 1st to 6th grade, with numbers declining sharply in high school. The data show a significant rise in specific learning disabilities between 2nd and 3rd grade, with the highest rates in this disability category from 3rd to 5th grade.

Overall Incidence Rates by Low Income Status

Chart 3.11. Low Income: Students with IEPs compared to Non-Disabled Peers, 2015-16

In MPS, 14% of regular education students come from low income families. There is a higher percentage of students from low income families in the population of students with IEPs (27%).

Overall Incidence Rates by Gender

Figure 3.12. Percent of Male vs. Female Students with IEPs, 2015-16

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11 A chart was not included to display this data as there are several disability categories with fewer than 5 students in any given grade.
Overall, 67% of all MPS students with IEPs are male and 33% are female. These percentages are equivalent to the national data, wherein roughly two-thirds of students served under the Individuals with Disabilities Education Act (IDEA) are boys (67%).

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IV. ACHIEVEMENT OF STUDENTS WITH IEPS

Performance of School-Aged Students on Statewide Assessments

The United States Department of Education (USDE) has established State Performance Plan (SPP) requirements that includes 20 indicators. Based on requirements set by USDE, each state is required to develop annual targets and monitor school district performance on each indicator. Of the 20 indicators, 15 are applicable to school districts and the remaining 5 are applicable to states. Of the 15 district indicators, 6 are considered to be “compliance” in nature: suspension/expulsion, racial/ethnic disproportionality for special education overall and for 6 disability areas; timely evaluations; preschool timely services; and transition services. The remaining indicators are considered to be “performance or results driven” in nature, e.g., high school graduation; high school dropout; statewide assessment performance; etc. States are required to make an annual “compliance” determination for each district and take enforcement action, if necessary, based on specific IDEA provisions.

The USDE has faced criticism in past years that the state performance plan indicators are heavily focused on compliance, and have limited focus on results for students with disabilities. In 2013, the federal Office of Special Education Programs (OSEP) announced its intention to change this practice and to include test scores, graduation rates, and post-school outcomes as the basis of the new “Results-Driven Accountability (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 considering compliance requirements of IDEA. RDA is designed to be transparent and understandable and to drive the improved academic and functional achievement for students with IEPs.

For the 2014 determinations, OSEP used results data on the participation of children with disabilities on regular statewide assessments; the proficiency gap between children with disabilities and all children on regular statewide assessments; and the performance of children with disabilities on the National Assessment of Educational Progress (NAEP). In the future, OSEP plans to use only regular statewide assessment data, rather than NAEP data, for annual determinations, including data on the growth in proficiency of children with disabilities on statewide assessments; this will occur after states have transitioned to college- and career-ready standards and assessments.

In the following sections, achievement data are analyzed, specifically regarding the performance of MPS’s school-aged students with IEPs on statewide assessments, along with graduation and dropout rates. These data take on additional importance now that OSEP has moved to an RDA framework, as there are points associated with both a “Part B Compliance Matrix” and a “Part B Results Driven Accountability Matrix.” Taken together, these scores constitute an RDA Determination and conclude whether districts and, ultimately, states meet IDEA requirements.\(^\text{13}\)

PERCENTAGE OF MPS STUDENTS WITH IEPS COMPARED TO THOSE WITHOUT IEPS MEETING ENGLISH LANGUAGE ARTS STANDARDS

The chart below reflects the percentage of MPS students with IEPs compared to their peers without IEPs meeting standards in the 2013-14 school year. In order to meet the standards students must score a performance level of Proficient or advanced on the statewide MCAS assessment.

Generally these data show a persistent gap in achievement between students with and without an IEP across all grades. A higher percentage of students without an IEP met the standards than those students with an IEP in MPS. Over 80% of general education students in grades 5 through 10 met the Reading standards which is higher than

\(^{13}\) Massachusetts was determined as a “Meets Requirements” state, as cited on their 2014 SPP/APR letters: http://www2.ed.gov/fund/data/report/idea/sppapr.html. A state’s 2014 RDA Determination is Meets Requirements if the RDA percentage is at least 80%, unless OSEP has imposed special conditions on the state’s last three IDEA Part B grants.
the percentage in 3rd and 4th grade, at 69% and 66% respectively. Similarly, more students in the higher grades with an IEP met standards than students with an IEP in the lower grades, with the outlier being in Grade 6 where only 31% of students with an IEP met the reading standards compared to 45% in Grade 5 and 50% in Grade 7. Grade 6 is also where the most significant achievement gap exists between students with and without an IEP meeting standards, representing a difference of 53 percentage points. These data show that in the 6th grade students without an IEP outperformed their peers with an IEP by 171%. The 10th grade has the smallest gap, between the percent of students with an IEP versus the percent of students without an IEP who met standards, at only 21 percentage points. The achievement gap in MPS is consistent with the statewide statistics. The next section will explore this comparison further.

Figure 4.1: ELA Percentage of MPS Students with/without IEPs, 2013-14 (Proficient and Advanced)\textsuperscript{14}

\textsuperscript{14} MA ESE, 2014 MCAS Achievement Results, http://profiles.doe.mass.edu/state_report/mcas.aspx
ENGLISH LANGUAGE ARTS: ACHIEVEMENT OF MPS STUDENTS WITH IEPS & PEERS STATEWIDE

At every grade tested, MPS students with and without an IEP outperformed their state peer groups. The difference in performance is greatest at grades 5 and 7 where MPS students with an IEP met standards at rates of 45% and 50% compared to the state average for students with an IEP at 24% and 30% respectively. From grade 7 to grade 10, however, the state rate for meeting standards for both students with an IEP and without an IEP began to catch up with MPS and by grade 10 MPS students were only performing slightly higher than their peers across the state.

Figure 4.2. ELA: Percentages of MPS and State Students meeting Reading Standards, 2013-14 (Proficient and Advanced)
Figure 4.3. Median Student Growth Percentile (SGP) over time for MPS & State Students with IEPs in English Language Arts
PERCENTAGE OF MPS STUDENTS WITH/WITHOUT IEPS (PROFICIENT AND ADVANCED), 2013-14

The chart below reflects the percentage of students with IEPs compared to those without IEPs meeting math standards in 2013-14. These data show a significant achievement gap at all grade levels between students with and without an IEP. This gap is the most significant at grades 6 and 7 where only 26% and 13% of MPS students with an IEP are meeting the standard in math, compared to 78% and 64% of their peers without an IEP. Like ELA the gap in grade 10 is the smallest with almost 60% of MPS students with an IEP meeting the standard. However, the 10th grade achievement gap in math is still higher than that of reading at the same grade level.

Figure 4.4. Math: Percentage of MPS Students with/without IEP (Proficient and Advanced), 2013-14

MATH: ACHIEVEMENT OF MPS STUDENTS WITH IEPS & PEERS STATEWIDE

At every grade tested, MPS students with and without an IEP outperformed their state peer groups in meeting the math standards. Variances between MPS and the state for all students ranged between 11 and 20 percentage points while the range of variances was larger between MPS and the state for students with an IEP -- from only 1 percentage point to 20 percentage points. The difference in performance is greatest at grade 5 where MPS students with an IEP met standards at rates of 42% compared to the state average for students with an IEP at 22%. The next largest difference is at the 10th grade where MPS students with an IEP outperformed the state subgroup by 18 percentage points which accounts for a 44% higher achievement rate than the state average. Across all students, MPS outperformed their state peers by only 11 percentage points in 10th grade math achievement. At grade 7, MPS students with an IEP only performed 1 percentage point better than the state average for students with IEPs (13% vs. 12%), and at grades 3, 4, 6 and 8 MPS students with an IEP performed within 10 points of the state rate. Interesting to note at all grades except 5th and 10th, MPS students outperformed their state peers by a higher margin than students with an IEP compared to the state rate of students with IEPs. This can be seen in the chart below by the larger gap between the MPS All Students line and the “MPS SWD” line and the “State SWD” line.

Figure 4.5. Math: Percentages of MPS and State Students meeting Math Standards, 2013-14 (Proficient and Advanced)\textsuperscript{16}

Figure 4.6. Median Student Growth Percentile (SGP) over time for MPS & State Students with IEPs in ELA

Graduation and Dropout Rates

GRADUATION RATES OF MPS STUDENTS WITH DISABILITIES

In 2014, MPS had a 98% 4-year graduation rate for its students in general education. This is compared to a 65.5% graduation rate of its students with disabilities. Compared to the state, MPS graduates a higher percentage of all students but a lower percentage of students with disabilities. Overall, the state 4-year graduation rate for students with disabilities was 69.1%. Both the MPS and state rate are lower than the state graduation target for students with an IEP of 80.0%.

Figure 4.7. Percent of MPS and State Students with and without an IEP Graduating from High School in 2014

17 MA ESE, Milton Special Education Data (2013-2014), Indicator 1,
GRADUATION RATES OF MPS STUDENTS WITH AN IEP COMPARED TO OTHER MASSACHUSETTS DISTRICTS

MPS graduates a lower percentage of students with an IEP than the comparable districts reviewed. Canton, Easton and Burlington had the highest rate of graduates with an IEP with all reaching above 80%.

Figure 4.8. Percent of Students with IEPs at MPS and Comparable Districts Graduating from High School, 2014\(^{18}\)

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According to the Special Education Results by MA ESE published for the 2013-14 school year, MPS had a dropout rate of 3.8% for students with IEPs. This rate is slightly higher than the state rate of 2.1% and the state target of 3.3%. Another ESE report of graduation and dropout rates for the 2013-14 school year show MPS has the second lowest dropout rate compared to comparable MA districts. They are slightly higher than Burlington and tied with Easton. Canton, Sharon, and Walpole, all have higher rates comparatively.

Figure 4.10. Dropout Rates of Students with IEPs at MPS and Comparable Districts, 2013-14

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V. EDUCATIONAL SETTING FOR STUDENTS WITH IEPs

The data in this section reflect the educational settings of MPS school-aged students overall, by disability areas, and race/ethnicity. In addition, district data are compared to state and national data, and State Performance Plan targets. Analysis related to the instructional implications of placement practices is found in Section V. Teaching & Learning for Students with IEPs.

Overall Educational Setting for MPS, State & Nation

Longitudinal data from 2012-13 to 2014-15 indicates MPS students with disabilities are educated more frequently in an inclusive general education setting and less frequently in substantially separate settings. Over this two year span, MPS has increased the percentage of students being educated in an inclusive setting, and decreased the percentage of students in separate settings. However, over the three year time span, MPS still has slightly more students educated in a separate settings than the state average.

- **Regular Ed Class more than 80% of time.** MPS’s 2014-15 rate of 74.9% is higher than the state target of 60.5%. While MPS has consistently had a higher percentage than the state target since 2012-13, this rate continues to rise representing an up-tick of 10.9 percentage points since 2012-13 (17% increase).

- **Regular Ed Class Less than 40% of time.** Since 2012-2013, MPS has consistently had between 10 to 11% of students being served in general education less than 40% of the time. This rate is slightly less than the state target of 14.5%.

- **Separate Setting.** MPS has slightly more students being served in separate settings, at 7.4% in 2014-15, compared to the state target of 5.5%. This is a 1% decrease from the prior year (2013-14) where 8.4% of students were educated in separate settings.
**Figure 5.1. Percentage of Students by Educational Setting for MPS & State SPP Target**

![Chart showing percentage of students by educational setting for MPS & State SPP Target]

**COMPARABLE SCHOOL DISTRICTS: PERCENTAGE OF STUDENTS IN GENERAL EDUCATION SETTING BY TIME**

The following chart reflects the percent of students with IEPs in general education classes by the three periods of time monitored by USED’s Office of Special Education Programs and MA ESE.

- **Regular Ed Class more than 80% of time.** All of the districts benchmarked serve more students in this setting than the state target of 60.5%. MPS is the second highest (74.5%) to Walpole (75.4%). Sharon and Canton are just slightly below MPS followed by Easton and Burlington who are both under 70%.

- **Regular Ed Class Less than 40% of time.** At over 10%, MPS serves the highest percentage of students in this setting compared to the other districts. Canton, Sharon and Walpole are the next highest respectively. They are followed by Burlington and Easton who serve the least in this setting with only 4.4% and 3.4%. All districts are lower than the state target of 14.5%.

- **Separate Setting.** MPS falls in the middle range of comparable districts for students served in separate settings. Only Easton, at 3.3%, is below the state target of 5.5%. Sharon and Walpole are both slightly below MPS, while Burlington and Canton’s percentage of students in separate settings both exceed the state target by more than double. In fact, Burlington’s rate of 17.1% is just under triple the state target.

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21 MPS Education Setting data are taken directly from the District’s Student Information System
22 MA ESE data by Education Settings, [http://www.doe.mass.edu/infoservices/reports/enroll/default.html?yr=sped1](http://www.doe.mass.edu/infoservices/reports/enroll/default.html?yr=sped1)
23 Categories for Educational Setting are based off of the three federal LRE calculations and include full inclusion (greater than 80% in general education), substantially separate (less than 40% in general education), and separate setting. Partial inclusion (40-79% of time in general education) is not accounted for and therefore LRE percentages do not equal 100%.
Figure 5.2. Percentage of Students by Educational Setting (Age 6-21) for Comparable Districts, 2014-15

Educational Settings reflect the percentage of students with disabilities in the three federally designated categories of full inclusion (greater than 80% time in general education), substantially separate (less than 40% of time in general education), and separate settings.

24 Educational Settings reflect the percentage of students with disabilities in the three federally designated categories of full inclusion (greater than 80% time in general education), substantially separate (less than 40% of time in general education), and separate settings.
### By School: Percentage of Students in General Education Setting by Time

#### Figure 5.3. Percentage of Students in each Educational Setting by School, 2015-16

- **Elementary Schools.** At the four elementary schools in Milton, students are educated mostly in the general education setting. All schools are serving more than 85% percent of students with disabilities in general education for more than 80% of the time. This is higher than the state target of 60.5%. According to the data received by PCG, the Tucker School serves all students in this setting. Only one school, the Glover School, serves students between 40 and 79% of the time in general education. Additionally, the Collicot, Cunningham, and Glover all serve students in a substantially separate setting at percentages of 10.3, 14.3 and 3.9 respectively.

- **Middle and High School.** Over 87% of students at Pierce Middle School spend the majority of their time in the general education setting. However, this percentage appears to drop at the High School where only 67% of students spend 80% or more time in general education setting. Both Pierce Middle School and Milton High School serve a higher percentage of students in this setting than the state target of 60.5%. In addition, a higher percentage of students are in sub-separate and substantially separate settings in the High School than in the elementary or middle schools.
Educational Setting by Disability Area

Figure 5.4. Percentage of MPS Students by Disability Area and Educational Setting

- **Regular Ed Class more than 80% of time.** Students with primary disabilities of communication, health, specific learning disability, and development delay are educated at a higher percentage in the full inclusion setting than the overall MPS average of 74.9%. Primary disabilities of intellectual, emotional, autism, neurological, and other all have a lower percentage of students educated in this setting than the MPS average. Only 3.8% of students with an intellectual disability are educated in regular education more than 80% of the time. In addition, and little over half of students with autism are educated in this full inclusion setting.

- **Regular Ed Class Less than 40% of time.** A majority of students with an intellectual disability are served in the substantially separate setting (76.9%), and slightly more than a fourth of students with autism spend less than 40% of their time in regular education (26.8%). Neurological, developmental delay and other disability type all serve about 10% of their students in this setting. No students with SLD, only 1% of students with a primary health disability type, and roughly 4% of students with a communication disability are served in this setting.

- **Separate Setting.** No students at MPS with a primary health disability or developmental delay are served in a separate setting. Disability types with the highest percent of students in a separate setting are other, autism, emotional and neurological. Of the other disability types in separate settings, 83% are students with multiple disabilities. The lowest percentages are students with a communication or specific learning disability. Both of these disability types have less than 3% of students in a separate setting.

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25 Section Sources::
MPS data, 2015-16
MA ESE, data by Educational Setting, 2014-15 (direct data request to ESE)
Nation, NCES d14, t060, data from 2012 - https://nces.ed.gov/programs/digest/d14/tables/dt14_204.60.asp
https://nces.ed.gov/programs/digest/d14/tables/dt14/204.60.a 3D

26 Other disabilities include sensory/hard of hearing, sensory vision/impairment, physical, and multiple disabilities and were combined due to low numbers.
AUTISM, INTELLECTUAL, AND MULTIPLE DISABILITY: MPS, STATE, & NATION

Figure 5.5. Percentage of MPS Students with Autism, Intellectual and Multiple Disabilities by Educational Setting

- **Autism.** Compared to the state and nation, MPS has more students with autism being educated in the general education classroom for 80% of the time. However, MPS also has slightly more students with autism in separate settings than both the state and nation at 17.9% compared to 15.4% and 9.2%. MPS also has a lower percentage of students with autism in partial inclusion (40-79% of the time) and substantially separate settings (less than 40%).

- **Intellectual Disability.** 3.8% of MPS students with intellectual disabilities are educated in general education for 80% or more of the time compared to 12.5% and 16.5% in the state and nation respectively. MPS is about the same as the state and nation with respect to students with intellectual disabilities being educated in separate settings. In addition, MPS has a higher percentage of students being educated in substantially separate settings and a lower rate of students in partial inclusion settings than both the state and nation.

- **Multiple Disabilities.** MPS and the state educate the same percentage of students with multiple disabilities for more than 80% of the time in general education at 12.5%. This differs from the national average which is higher at 31.4%. MPS has a significantly higher rate of students with multiple disabilities being educated in separate settings than the state and national average, MPS (62.5%) is three times the national rate (23.0%) and almost nine times the state rate (7.8%). Please note that these figures may be impacted by the very small number of students who are identified as having multiple disabilities.
**SLD, EMOTIONAL, AND HEALTH DISABILITY: MPS, STATE, & NATION**

Figure 5.6. Percentage of MPS Students with SLD, OHI, and EBD by Educational Setting

- **Specific Learning Disability.** MPS students with SLD are educated at higher rate in the full inclusion setting (more than 80% of the time) than the state or national rate. However, MPS has a lower rate in the partial and substantially separate settings, and a slightly higher rate in separate settings.

- **Health Impairments.** Almost all MPS students with Health impairments are educated in general education for more than 80% of the time. This is a higher rate than the state and national rate at 16.4% and 63.7% respectively. To that end, MPS has lower rates of students in partial and substantially separate settings. The state and national rates for students educated in partial inclusion are 15% and 22.4%, which is higher than MPS at 4.3%. MPS has no students with health impairments being educated in separate settings.

- **Emotional/Behavior Disability.** Compared to the state and national rates, MPS educated a substantially higher percentage of students with emotional and behavioral disabilities in the general education setting for more than 80% of the time. The MPS rate is 70% compared to 41.7% and 44% in the state and nation. In addition, the rate of MPS students in separate settings (14%) is slightly less than the national rate of 17.8%. The MA state rate is higher than both the nation and MPS rate for educating students with emotional and behavioral disabilities in separate settings at 26.9%.
Separate Settings

The pie chart below shows the percent of MPS students with disabilities who are educated in separate settings, disaggregated by disability type. Autism, emotional, and neurological impairments are the primary disability for the largest portion of students being educated in separate settings with 26%, 19%, and 18% respectively. 13% of students educated in separate settings are students with multiple disabilities. Communication, specific learning disability, intellectual, and other disabilities represent a smaller portion of the students and are all below 10% of the students in separate settings.

Figure 5.7. Percentage of MPS students with disabilities by disability type who are educated in separate settings, 2015-16.
Educational Setting by Race

Asian students with disabilities have the highest rate of inclusion in the general education setting for more than 80% of the time at 89.5%, followed by white, other, and black students with disabilities at 79.1%, 77.8% and 72.5% respectively. Black students with disabilities are included in this setting slightly less than the MPS average of 74.9%, yet is still higher than the state or national rate of students with disabilities in this setting. White students with disabilities at MPS are educated in separate settings a slightly higher rate than the MPS students of other races. Black students with disabilities have the lowest percentage of students educated in separate settings, but a higher rate in partial and substantially separate settings than students of other races.

Figure 5.8. Percentage of MPS students with disabilities by race and educational setting, 2015-16

27 Other races include: Hawaiian and Pacific Islander, Native American or American Eskimo, and Multi Race.
VI. TEACHING AND LEARNING FOR STUDENTS WITH IEPs

This section provides information related to MPS’s teaching and learning practices for students with IEPs and addresses recommendations to improve student achievement and functional outcomes. Massachusetts’s alignment of its Curriculum Frameworks to the Common Core State Standards (CCSS) provides a historic opportunity to improve access to rigorous academic content standards for students with IEPs, and serves as the centerpiece for considering current MPS special education practices and recommendations for improvement.

Supporting Instruction and Inclusion in the General Education Setting

For students with disabilities to improve their academic achievement and reduce the achievement gap with their nondisabled peers, they need to be involved in the core curriculum and receive evidence-based interventions that are targeted and implemented with fidelity.28

COLLABORATION

Across the board, focus group participants described a district-wide collaborative culture. Staff at all levels appear to embrace this culture. Collaboration was reported to be strong not only amongst special educators but also among special educators, general educators and the administration. Comments included:

- “General education teachers are open and flexible to working with special education.”
- “Teachers are inviting and want to work together.”
- “Teachers are very hardworking and accommodating.”
- “Principals are supportive of programs and knowledgeable about special education.”
- “Teachers share materials across schools.”
- “The administration is flexible.”

Many focus group participants noted that the constant collaboration between staff is surprising given the lack of shared planning time among colleagues. Many special educators expressed having no scheduled time to work to collaborate with general education teachers. Meetings often occur “on the fly over lunch, in the hallway or on bus duty.” Others report coming in early or staying late to find time to meet, a practice “people are open to because they have no other choice.” Across the board, focus group participants wanted more time in their schedules to collaborate.

CO-TEACHING

Co-teaching is a model for inclusion that is offered across all District schools. There is a general educator and a special educator assigned to every co-teaching classroom. The program is more mature at the elementary level, and in phases at the secondary level.

Overwhelmingly, the co-teaching program is viewed as a District strength and source of pride at the elementary level. Focus group participants praised the program for several reasons. Two teachers in the classroom benefit all students, not just those with special needs. The workshop model becomes easier to implement, as does flexible grouping. The general educator learns from the special educator and often becomes better at differentiating instruction. There is continuity for students when one of the teachers may not be present. Finally, peer role models allow for friendships between students who may not have otherwise had the opportunity to interact.

28 IDEA regulation at 34 CFR 300.320
PCG observed a number of elementary co-taught classrooms and were impressed with the quality of instruction and co-teaching observed. In every instance, we were not able to distinguish between the special educator and general educator. Teachers were using flexible grouping with both teachers leading lessons. Materials were differentiated and engaging.

Focus group participants expressed a desire for more professional development to better understand co-teaching strategies and to learn about best practices. However, it was specifically noted in focus group discussion that this professional development requires an enhanced degree of subsequent support and follow-up. As noted, planning time arose as a common concern. In the middle and high school this concern was particularly true in situations where teachers had multiple co-teaching pairs. Lack of common planning time lead some special educators to feel "more like a glorified aide."

**CO-TEACHING IN THE ELEMENTARY SCHOOLS**

At the elementary level, there are nine co-taught classes offered across three District schools: Collicot; Glover; and Tucker. In 1st-3rd grade, the general educator and the special educator are paired together for the full school day. In 4th and 5th grade, special educators are only assigned to the class half of the day.

The chart below shows the student count and distribution of the 61 students with IEPs in the co-taught setting. The unwritten District policy is that classes are capped at 18 students, and no more than half of the class should have an IEP. In reality, in the elementary school ratios hover closer to only about 1/3 of students in the class having IEPs. Class sizes range from 16 to 21 students. Secondary co-taught class assignments are explored later in this section.

**Figure 6.1. Distribution of Students with IEPs in Elementary Co-taught Classes, 2015-16**

<table>
<thead>
<tr>
<th>School</th>
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</tr>
</thead>
<tbody>
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<td>Collicot</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>8</td>
<td></td>
<td>8</td>
</tr>
<tr>
<td>Cunningham</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Glover</td>
<td>6</td>
<td>6</td>
<td>7</td>
<td>7</td>
<td>8</td>
<td></td>
<td>34</td>
</tr>
<tr>
<td>Tucker</td>
<td>4</td>
<td>6</td>
<td>7</td>
<td>11</td>
<td>14</td>
<td>17</td>
<td>61</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>6</td>
<td>6</td>
<td>7</td>
<td>11</td>
<td>14</td>
<td>17</td>
<td>61</td>
</tr>
</tbody>
</table>

Co-teaching is reported to become less effective in 4th grade when the special educator is only in the room for half of the day. Focus group participants stressed that the content in these grades becomes more challenging, and many students would benefit for the additional support of the special educator. It should also be noted that based on this year’s schedules, these grades have the highest concentration of students receiving special education services in the co-taught classes.

Based on a review of class lists, some schools have classes where there is only one teacher assigned to the class that have numbers that mirror the co-taught ratios (at least 35% of class with IEPs). While PCG did not review these students’ IEP records, these concentrations do suggest a further review may uncover the need for more co-taught classes across the District. The elementary classrooms that appear to display this pattern of high level of students with IEPs include:

- Cunningham: 3rd grade, 4th grade, 5th grade (2 classes)
- Glover: 3rd grade, 5th grade

---

29 4th grade classes are split with Collicot
Focus group participants noted uncertainty as to why there were co-taught classroom in some schools but not others. While there are District level procedures in place, these procedures could be more clearly communicated to schools and families. While there is a high level description in the program of studies booklet, there is no detailed written policy as to how the need for co-taught classes are determined.

**Elementary School Pathways**

The English STEM Innovation and the French Immersion Pathways are available in all four elementary schools and are open to all children in the District in grades 1-5. The number of classes for each Pathway varies by school. Program enrollment is driven by parental choice and occurs via lottery towards the end of the student’s kindergarten year. Program entry in French Immersion is not allowed after 1st grade except in special cases.

**ENROLLMENT OF STUDENTS WITH IEPS IN FRENCH IMMERSION**

Students with IEPs less frequently choose to enroll in the French Immersion program than students who do not have an IEP. Only 5.5% of elementary school aged students enrolled in the French Immersion program have an IEP. As noted below, the numbers of students with IEPs in the French Immersion program are relatively small. This trend can be observed across all elementary schools and grades.

**Figure 6.2. MPS Students with IEPs in French Immersion by Elementary School, 2015-16**

<table>
<thead>
<tr>
<th></th>
<th>Students with IEP French</th>
<th>Students with No IEP French</th>
<th>Total Students French</th>
<th>% Students with IEPs French</th>
<th>Total % of Students with IEPs School-wide</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>By School</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Collicot</td>
<td>17</td>
<td>224</td>
<td>241</td>
<td>7.1%</td>
<td>16.4%</td>
</tr>
<tr>
<td>Cunningham</td>
<td>10</td>
<td>153</td>
<td>163</td>
<td>6.1%</td>
<td>15.8%</td>
</tr>
<tr>
<td>Glover</td>
<td>14</td>
<td>246</td>
<td>260</td>
<td>5.4%</td>
<td>13.9%</td>
</tr>
<tr>
<td>Tucker</td>
<td>3</td>
<td>129</td>
<td>132</td>
<td>2.3%</td>
<td>8.7%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>44</td>
<td>752</td>
<td>796</td>
<td>5.5%</td>
<td>13.7%30</td>
</tr>
<tr>
<td><strong>By Grade</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>14</td>
<td>162</td>
<td>176</td>
<td>8.0%</td>
<td>11.5%</td>
</tr>
<tr>
<td>2</td>
<td>5</td>
<td>146</td>
<td>151</td>
<td>3.3%</td>
<td>12.6%</td>
</tr>
<tr>
<td>3</td>
<td>10</td>
<td>135</td>
<td>145</td>
<td>6.9%</td>
<td>17.2%</td>
</tr>
<tr>
<td>4</td>
<td>7</td>
<td>168</td>
<td>175</td>
<td>4.0%</td>
<td>14.2%</td>
</tr>
<tr>
<td>5</td>
<td>8</td>
<td>141</td>
<td>149</td>
<td>5.4%</td>
<td>18.4%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>44</td>
<td>752</td>
<td>796</td>
<td>5.5%</td>
<td>14.8%</td>
</tr>
</tbody>
</table>

While the District asks for a five year commitment to the French Immersion program, there are circumstances where students have exited the program. Over the past five years, 31 students with IEPs have left the French program across all elementary schools. Half of those with IEPs who left exited over the five year period did so in the 1st grade, with numbers diminishing accordingly after that. By 3rd grade only a handful of students with IEPs left each year, with no attrition at all by 5th grade. Only 13 general education students left over the same five year time period. There is no pattern for students without IEPs who leave French.

30 School-wide percentages include students in Pre-K and K.
REFERRAL/TESTING

Testing French students who are suspected of having a specific learning disability (SLD) has been a challenge for the District. Students in the French Immersion Program have the same rights to a special education evaluation as students in the English STEM Pathways Program. However, the District has historically struggled with appropriate protocols for evaluating students as the tests administered by the District are not believed to be normed for French. There are no clear written policies for when students can be tested due to academic concerns. As such, it was stated by a number of focus group members that students in the French program cannot be tested for SLD until the 3rd grade. Others noted that there was a new policy this year that allowed for testing to occur in 2nd grade. There is concern that there are students not receiving intervention services who may benefit from them given the delay in testing.

SPECIAL EDUCATION SUPPORT

There is the misperception across the District community that there are “no special education services for French students.” A combination of the low number of students with IEPs in the program and the District’s reliance on pull-out services in English likely fuels this belief.

Recent efforts have been made to bolster supports for students with special needs. The District recently hired two additional French speaking general education reading specialists to provide reading support to those students who may need it in the early grades. This support, however, tapers off in the upper elementary school grades. Access to a co-teaching is not an option to students in the French program.

Only two elementary French staff have special education certification; one of whom functions as a reading specialist. Paraprofessional support is also limited, as there is a challenge in finding qualified French-speaking candidates.

High School Coursework Taken by Students with IEPs

In the leveled course system at the high school, there are nine team taught classes, and they are the supported version of a general college preparatory classes. There is no team inclusion offered for advanced coursework.

On the whole, almost 64% of the students in team taught courses have IEPs. There are a number of courses where the concentration of students with IEPs is much higher (e.g., Intro to Algebra at over 80%), while others have few students with IEPs (e.g., Biology 1 at less than 10%). A review of course schedules indicated a number of areas that warrant further review to determine if staff could be used more efficiently to offer increased access to co-teaching opportunities for students.31

- Most of the Biology 1 (0423) classes had more students with IEPs than the co-taught Biology 1 course (4 of the 6 courses).
- Nearly a quarter of all students who take Chemistry 1 (0433) have IEPs, but there is no co-taught option. In one class, 47% of the students have IEPs.
- Roughly 40% of all students who take US History I (0533) and US History II (0536) have IEPs, but there is no co-taught option. There is a US History I where 73% of the students have IEPs and US History II course where 77% of the students have IEPs.
- There is an English II class where 35% of the students have IEPs, while the co-taught English II class is only at 17%.

31 PCG reviewed middle school team taught course assignments also. While the diversity of team taught courses are limited, scheduling appears to be more evenly balanced. The average team taught course in the middle school was 37% students with IEPs, with the range being 23% to 48%.
The charts below highlight the percent and ratio of students in a team taught class with IEPs to their regular education peers.

**PARTICIPATION IN CO-TEACHING AT THE HIGH SCHOOL**

**Figure 6.3. Percent of Students in Milton High School Co-Taught Classes with an IEP, 2015-16**

**Figure 6.4. Ratio of Students with and without IEPs at Milton High School in Co-Taught Classes, 2015-16**
PARTICIPATION IN ADVANCED CLASSES

In addition to including students with IEPs in regular general education classes, it is important that they be included in courses that demand a high level of rigor. In contrast to the number of students with IEPs in co-taught classes, advanced classes—Honors and AP level—have a very low number of students with IEPs. Of the 1,043 students enrolled in any advanced class, only 15 students enrolled had an IEP.\(^{32}\)

- 1.43% of students enrolled in advanced classes had an IEP. No students with IEPs were enrolled in advanced Computer Science or Visual and Performing Arts course.
- 2.5% of students enrolled in Honors courses had an IEP.
- Less than 1% of students enrolled in AP courses have an IEP. Students with IEPs were enrolled in the following three AP courses: AP European History; AP Calculus AB and AP English.
- Only 3% of students enrolled in any world language course (all levels) had an IEP. Less than 1% of those enrolled in a French Language course had an IEP. The numbers were slightly higher in Spanish (4%) and Latin (6%).

Chart 6.5. Percent of Students taking Advanced Classes (Honors and AP) with Disabilities, 2014-15\(^{33}\)

Configuration of MPS Special Programs & Services

The District’s stated goal is to make every effort to keep students educated in the District, wherever possible. To achieve that goal, the District has focused on creating a number of high quality special programs and services to support students with more intensive needs. In the past decade, the number of students in out of district placements have dropped from 13% of the overall special education population to less than 8%. However, enrollment in some of the District programs remains low.

\(^{32}\) This number is overall seat count in advanced courses, and may not represent unique students. Individual students both with and without IEPs may be counted multiple times if they are enrolled in more than one course.

\(^{33}\) American Experience is an honors class that is both an English and Social Studies class. It meets twice in a rotation and is taught one period by an English teacher and once by a Social Studies teacher.
At the elementary level, programs are housed in a certain school but are available to any student who would benefit from that setting. Program referral occurs at the child’s home school. The District recognizes the need to better document requirements a student needs to meet to be in the program to ensure more appropriate student placement. The District also believes they could do a better job of promoting the programs, highlighting the services, supports and inclusion opportunities available to students.

**Figure 6.6. Specialized Programs at Milton Public Schools, 2015-16**

<table>
<thead>
<tr>
<th>PROGRAM NAME</th>
<th>SCHOOL</th>
<th>TOTAL ENROLLED</th>
<th>GRADES SERVED</th>
<th>PROGRAM DESCRIPTION</th>
<th>OPPORTUNITIES FOR INCLUSION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre K</td>
<td>Collicot</td>
<td>Total=11</td>
<td>Ages 3-5</td>
<td>For preschool students with intensive special needs (i.e. autism, intellectual)</td>
<td>Students in inclusion for programs such as “meet the scientist,” “meet the artist,” &amp; “reader’s workshop.” Lunch, recess</td>
</tr>
<tr>
<td>PARTNERS</td>
<td>Collicot</td>
<td>4</td>
<td>K-1</td>
<td>For younger students primarily diagnosed with autism</td>
<td></td>
</tr>
<tr>
<td>New England Center for Children (NECC)</td>
<td>Collicot</td>
<td>5</td>
<td>2-5</td>
<td>For older students primarily diagnosed with autism</td>
<td></td>
</tr>
<tr>
<td>LEAP 1</td>
<td>Cunningham</td>
<td>2</td>
<td>K-2</td>
<td>For students primarily with intellectual impairments</td>
<td>Students in inclusion for programs such as “meet scientist,” “meet the artist,” &amp; “reader’s workshop.” Lunch, recess</td>
</tr>
<tr>
<td>LEAP 2</td>
<td>Cunningham</td>
<td>6</td>
<td>3-5</td>
<td>For students primarily with intellectual impairments</td>
<td>Students in inclusion for programs such as “meet scientist,” “meet the artist,” &amp; “reader’s workshop.” Lunch, recess</td>
</tr>
<tr>
<td>REACH</td>
<td>Pierce Middle</td>
<td>TOTAL=11</td>
<td>6-8</td>
<td>For students primarily with intellectual impairments/autism</td>
<td>Students may be in inclusion setting for geography, specials, and math, and English per IEP team decision</td>
</tr>
<tr>
<td>ACHIEVE</td>
<td>Milton High</td>
<td>9</td>
<td>9-12</td>
<td>For students primarily with intellectual impairments/autism</td>
<td>Students may be in inclusion classes per IEP for history, science, math, and all students are in electives</td>
</tr>
<tr>
<td>Post Grad</td>
<td>Milton High</td>
<td>5</td>
<td>Ages 18-22</td>
<td>For students primarily with intellectual impairments/autism</td>
<td>Students work at job sites within the community 5 days per week with job coach</td>
</tr>
<tr>
<td>STEP 1</td>
<td>Glover Elementary</td>
<td>4</td>
<td>1-5</td>
<td>For students with emotional needs (many)</td>
<td>Students are primarily in inclusion classes</td>
</tr>
</tbody>
</table>
The District has two substantially separate classrooms for students with autism, which is managed by the New England Center for Children (NECC). This program is for students with autism in grades 2-5 at the Collicot Elementary School. NECC funds the classroom teacher and weekly consultations from a BCBA.\(^\text{34}\) The paraprofessionals are hired by the District. Training is provided by NECC. ABA and discrete trial training, along with inclusion are part of the program. Parent training and monthly clinics are offered to families. Focus group participants spoke highly of the program and the opportunities it offered to students.

Given the success of this program, the District developed an innovative relationship with NECC to support program expansion to grades K-1. The District purchased NECC’s curriculum for the PARTNERS program, which is also for students with autism. All staff are employed by the District. The classroom receives consultation and support from a BCBA from NECC. Parent training and monthly clinics are offered to families. This relationship with NECC allows the District to offer high quality programming for students with autism, while still allowing them to remain in the District and attend school with their neighborhood peers.

As program enrollment grows, the District will likely need to consider adding an additional classroom. There is also concern for what happens to students when they transition to middle school, as a program like NECC does not exist for these students. While costs for this program are high, it still represents a significant savings when compared to educating these students in outside placements.

The English language-based program at the high school is considered to be effective in supporting students with reading and/or written expression. Teachers indicated attempting to replicate similar strategies in other courses where students may need this same level of support to understand the text. Students at the middle school do not have access to similar programming, but it was noted that a number of students would likely benefit from this type of support. In the absence of such support, out of district placements may be identified as the best option for some students. Others may remain, struggling, in a general education setting.

There are four substantially separate classrooms for students with intellectual impairments across the District: LEAP 1 and 2 at the elementary level; REACH at the middle school; and ACHIEVE at the high school. Class sizes in

\(^{34}\) This BCBA is separate from the district-wide BCBA.
these programs are small, particularly in LEAP 1. Some focus group members noted concern about the LEAP program’s recent reputation among families, as parents understandably “do not want to send their kindergartener to a sub-separate classroom.” There are currently no policies of procedures around inclusion or co-teaching for this program. All LEAP I and II are assigned, at a minimum to general education for inclusion during specials, lunch/recess and other special academic activities and projects.

The District should continue to make efforts to ensure that LEAP students are included to the fullest extent possible, and better communicate the potential for flexible schedules to families. Parents of students in LEAP expressed having a good experience with the program, noting the “small group allows their child to learn” and that they are “grateful for the community” it provides. They range of services and dedication of the teachers were also noted as program strengths.

Access to appropriate curriculum and materials for special programs was noted as a huge concern. Curriculum coordinators noted that sub-separate programs do not get enough attention, and that teachers “have to ask again and again, and show up at their door again and again” for appropriate materials. At the elementary level, LEAP teachers can modify existing MPS resources. However, Reach and Achieve do not have access to elementary materials and upper grade level materials are often not appropriate. Teachers reported finding and identifying resources on their own, often via word of mouth or websites like Pinterest. The NECC and Partners program do not have this concern, as NECC provides the curriculum.

Budget practices appear to drive this challenge as curriculum is purchased at the building level. The Special Education Office does not have its own budget for curriculum, even for district-wide or specialized programs. According to principals, the specialized program budget comes out of their school budget and schools with a program do not get extra budget for the program. Focus group participants noted that specialized programs cost more money (rugs, sound panels, etc. are costly items). As there is no special education materials line item, funding student specific needs come from the building budget. However, while there was some concern over how dollars were allocated, all focus group participants agreed that resources were readily available and provided when requested.

**IEP Quality**

Focus group participants noted that the IEP writing process needs support across all levels. Current IEPs are not considered to be user-friendly, creating the fear that teachers are not appropriately implementing them because they did not understand what is being asked of them. Complaints included: inconsistency of terminology; poorly worded goals; and overly complicated service delivery grids. Parents, in particular, expressed concerns over the clarity of IEPs, noting: “Milton IEPs are literally the most confusing thing I have ever read;” “Parents are in tears because they can’t understand;” and “I feel like the confusing IEPs are on purpose. They don’t want to give services because it costs a lot of money.”

The high school has had recent training where they created shared common goals and worked on IEP writing. The intent was to make sure goals are clear, measurable, and limited in number. In November 2015, two of the elementary schools - Collicot and Cunningham - have also had training regarding writing IEPs, the IEP process, and IEP meetings. In the previous years, training was also provided regarding writing IEPs.

**Compliance**

MPS completed a state-facilitated Coordinated Program Review (CPR), an intensive audit that focuses on a number of compliance related metrics for special education in 2011. The state performs this review every six years. Out of 59 criteria for special education requirements, the District was said to need improvement in 11 areas. Three additional civil rights findings are pertinent to special education. While these findings represented additional work
needed to be done, they represented a marked improvement over the previous report. The District’s 2005 CPR report found that 35 criteria needed improvement and two criteria were not implemented. The District expectation should be that all criteria are found to be fully implemented in the 2017 CPR.

Figure 6.7. Needed areas for improvement, 2011.

<table>
<thead>
<tr>
<th>Required Actions</th>
<th>Current District Practices</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administer assessments in the language and form most likely to yield accurate information on what the student knows and can do academically, developmentally, and functionally</td>
<td>When students enroll in the District, the parents complete the new student registration form. As part of this form, the parent notes the child’s language (spoken and written). Students are tested based on the information in the new student packet in the appropriate language. For students receiving ELL services, special education staff consult with testing conducted by ELL staff to determine the most appropriate language for testing as well.</td>
</tr>
<tr>
<td>Document all required educational assessments (Forms A and B)</td>
<td>Team chairpersons are responsible for providing these forms to teachers and appropriate staff members to complete.</td>
</tr>
<tr>
<td>Complete written determination as to whether or not student has a specific learning disability post-evaluation</td>
<td>At eligibility meetings, the team chairpersons are responsible for reviewing the state mandated paperwork with the team to determine the presence of an SLD.</td>
</tr>
<tr>
<td>Document the student’s decision to share or delegate decision-making upon reaching 18</td>
<td>The high school team chairperson is responsible for providing students and parents information regarding age of majority at least one year prior to the student turning 18.</td>
</tr>
<tr>
<td>Meet all mandated timelines</td>
<td>District processes related to other areas, including holding all IEP meetings on or before the anniversary date, leads to meeting all mandated timelines.</td>
</tr>
<tr>
<td>Implement re-evaluation procedures when suspected that a student is no longer eligible for special education</td>
<td>The team chairperson is responsible for sending a consent form along with an N1 form to reevaluate students.</td>
</tr>
<tr>
<td>Hold annual IEP meetings on or before anniversary date</td>
<td>The team chair is responsible for scheduling all meetings, completing all paperwork (meeting invitation), and sending out notice to the parents. The Director of Pupil Personnel Services monitors timelines through ESPED.</td>
</tr>
<tr>
<td>Correct usage of amendments for a change in placement</td>
<td>A change in placement is usually not included in an amendment. This would require a new IEP. Amendments are used for minor changes to the IEP.</td>
</tr>
<tr>
<td>Complete all IEPs fully</td>
<td>Individual service providers revise or write their particular sections of the IEP. Then, the team chairperson is responsible for making sure that the IEP is accurate. The team chairperson signs the IEP and send two copies to the parent.</td>
</tr>
<tr>
<td>Provide the parent with the proposed IEP immediately following its development</td>
<td>See above</td>
</tr>
</tbody>
</table>
Translate written communications to parents when necessary
The team chairperson notifies the Pupil Personnel Office of all translations. PPS staff then secures the translated copies.

Translate special education documentation and ensure accurate translation
See above

Complete monitoring plans for out-of-district students
The Out of District Coordinator is responsible for creating monitoring plans.

Train all employees in the District's physical restraint procedures within a month of their employment.
The District has all staff attend a presentation and/or watch a video regarding regulations within one month of employment.

**Vertical Transitioning between Grades**

Effectiveness of classroom instruction is directly linked to the quality of the planning and communication process that precedes instruction. Some focus group members felt that vertical transitions were smooth and well structured, while others indicated that more could be done. Transition meetings between elementary/middle and middle/high are held as separate meetings from the IEP meeting. They are used as a time to discuss services and options in the new school.

While these meetings were described as helpful, others identified the need for further formal structures in place to pass knowledge. This concern was particularly true for students in substantially separate settings. While transition meetings occur at the end of the year, most believed that it did not give the full story of the child as a learner for students in sub-separate classrooms. In the ideal, the new teachers would go into the classroom to see what the students can actually do and provide the opportunity for students to meet their teacher in a comfortable setting. The team chair currently makes these visits, but receiving teachers also indicated they would like to make this visit as well.

A number of social activities were described to help support transition between schools. For example, all 5th graders have a move-up half day to visit the middle school. There is also a voluntary five day summer camp at the middle school for students who are anxious about 6th grade. This camp is paid for by parents, and is well-attended. The high school has an optional cookout for incoming freshman; the elementary schools have “popsicles with the principal.” It should be noted that these are opportunities available to all students in the District and are not specially designed for students with IEPs. School visits for students with IEPs have occurred in the past as needed, but there is no formal practice in place.

**Accommodations/Modifications & Collaboration**

It was reported as the perception by focus group members that most general education teachers are willing to accommodate students and work with special educators. Team chairpersons are required to provide IEP documentation to teachers prior to the start of classes. Teachers are required to sign a sheet noting that they received the information. However, it was reported that it was sometimes difficult to get guidance from special educators about accommodations/modifications needed for students with IEPs. Some teachers shared concern about not receiving sufficient information at the beginning of each school year regarding student needs. While planning time before and after school was used in some schools for collaboration, some wanted more time for this activity.
Transition to Post-Secondary Activities & Education

For students to make a successful transition from secondary education to postsecondary training, education, employment, and, where appropriate, independent living skills, students must graduate with a regular diploma (to the maximum extent possible) or a graduation certificate, and receive appropriate postsecondary activities and support.

POSTSECONDARY OUTCOMES

Based on the Department of Elementary and Secondary Education’s (ESE) report of graduates attending higher education, Milton graduates attend postsecondary institutions at a rate higher than state average for both students with and without IEPs. Close to 80% of students with IEPs who graduated from Milton in 2013 went on to attend a postsecondary institution, while only 58% of their state peers with disabilities continued their education.

MPS students with IEPs were less likely to attend a 4 year institution than their state peers, but more likely to attend a public two year institution or community college. The large majority of MPS students with IEPs who pursued higher education (72%) attended a public two year institution, but only 24% of all Milton students pursued that same path. PCG did not have access to student workforce data, and would encourage the District to monitor data for those students with IEPs seeking employment after graduation to ensure transition opportunities match career goals.

Figure 6.8. Percent of MPS Students Attending Institutions of Higher Education Compared to State, 2012-13

![Bar chart]

Figure 6.9. Student Participation in Higher Education by Type, 2012-13

POSTSECONDARY TRANSITION SUPPORT

School districts are required to facilitate the transition of students with IEPs to post-secondary activities, beginning by the age of 14 years, or sooner as determined by the IEP team. The IEP team, including the student, uses age-appropriate transition assessments to design transition services and support, identify postsecondary outcomes, plan a course of study, develop a coordinated set of transition activities, and identify interagency responsibilities and linkages as appropriate. Transition services and support prepare students for employment and independent living through a coordinated set of activities that promote movement from school to post-school activities, including postsecondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, and community participation.37

Students begin taking a more active role in their IEP development no later than age 14 as part of their transition activities.38 Some parents noted that transition planning for 8th and 9th graders was often delayed, and expressed wanting the goals to be more reflective of their child’s needs. High school guidance counselors noted that special education is taking more ownership over transition planning than in the past. Guidance Counselors work with students to create transition plans in their sophomore and junior years. These plans are then formally implemented during the student’s academic support classes.

In the past, the District paid for students to receive vocational trainings from outside agencies. This has now been brought in house and students are now able to job train in their own community. The post graduate program includes a certified special education teacher and two job coaches. The program serves five students.

MPS continues to partner with two outside agencies who provide vocational training for students in the District’s special programs.

37 MA ESE Guidance on Transition from School to Adult Life http://www.doe.mass.edu/sped/links/transition.html
38 Technical Assistance Advisory SPED 2009-1: Transition Planning to Begin at Age 14 http://www.doe.mass.edu/sped/advisories/09_1ta.html
VII. SUPPORT FOR TEACHING AND LEARNING

This section provides information about MPS’s support for the teaching and learning of students with IEPs. It addresses the following areas: Organization, Special Education & Related Services, Personnel Ratios & Support, Assistive Technology, Professional Development, Fiscal Issues, Parent Involvement, and Accountability for Desired Results.

Organization

Collaboration and communication between school and central office staff are critical factors in supporting students with disabilities, most of whom are educated in regular classes for some or most of the school day. Though collaboration and communication are seen by many as a legal mandate under IDEA, at its core it is a best teacher practice and necessary for the inclusion of children with special needs. As expressed in focus group sessions, MPS actively works to integrate these concepts into its work for the benefit of ALL children.

With this perspective, the MPS organization at the central office level and at the school level are discussed below related to the effective and efficient administration and operation of specially designed instruction (SDI) and related services.

DISTRICT LEADERSHIP

The District’s current Superintendent has a hands-on approach and has taken a very active role in special education in the District. There is a strong commitment at the District level to support positive change for the benefit of students with disabilities, and the Superintendent empowers staff to drive this change. This belief was echoed by numerous focus group participants. There is also the belief that the District is willing to make necessary financial investments in special education to improve student achievement, to bring more students back into the District, and to realize longer-term savings.

INCLUSION VISION

While many districts proclaim to abide by a “full inclusion” philosophy, in many cases this belief does not play out in practice. However, at all levels of the MPS organization, from teachers, to paraprofessionals, to the Superintendent and School Committee, the commitment to “full inclusion” is evident and clearly articulated. There is a strong overarching belief that students with disabilities should be educated alongside their general education peers and included in school activities to the greatest extent possible. The MPS administration should be commended for the positive actions it has taken, such as adding an Inclusion Specialist position this school year, to realize this goal.

Focus group participants indicated a District need to further define the term “inclusion” in written and online materials. These documents should explain to staff and parents what to expect in a co-teaching environment and how inclusive practices are incorporated into the school environment. The District should also publicize this commitment so that all stakeholders see it in many communications (e.g., in parent and staff newsletters, on the website, etc.).

OFFICE OF PUPIL PERSONNEL SERVICES

The current Director of Pupil Personnel Services, Tracy Grandeau, started in this role at the beginning of the 2015-16 school year following the departure of the previous director. Though Ms. Grandeau is new to this role, she is not

new to the District, having previously served as the Team Chair at the high school. Given this recent change in the Director position, the District has the opportunity to chart a different course for the department and to create a new vision with student achievement and stakeholder engagement at the forefront. Across the board, focus group participants shared the positive contributions that Ms. Grandeau has already made toward creating an encouraging and supportive environment for children, staff, and parents. Participants shared that she is “responsive,” “supportive of all programs,” and focused on “building a partnership between the District and parents, including with the Special Education Parent Advisory Council (SEPAC).” With the strong support of the Superintendent and the central office and school based leadership teams, Ms. Grandeau seems well positioned to not only manage compliance and legal mandates but to drive academic achievement for students with disabilities.

Now that the new Special Education Director has a better understanding of the organization, the Office has begun to develop new systems and better documentation of procedures. The Special Education leadership should continue to prioritize clarifying the processes and expectations for special education staff in the coming school year. This should occur through written communication in a consolidated format, mandated in person professional development targeted at special educators, and job-embedded coaching/mentoring. As the Department grows under the direction of Ms. Grandeau, there are several key areas to address immediately.

**Set a clear, measurable, and long term vision.** Focus groups participants articulated that they feel the Special Education Department currently functions in a piecemeal manner, is inefficient, and lacks a cohesive vision. Essential to the new director’s job will be the development of a collaborative vision with clear expectations around the Department’s goals for the next 3-5 years. This vision should dovetail with expansion of the inclusion vision detailed above.

**Create efficient data systems.** Participants cited several examples of inconsistencies among reported data due to multiple data entry points, along with a delay in many systems to reflect the current picture of students in schools. Other data is only collected in a piecemeal or informal manner. Given the plethora of data requirements placed on school districts, especially in the area of special education, the District should analyze how data are managed/stored and managed in order to determine how to more efficiently operate. The Director should invest time in understanding how all special education data points (for state and federal reporting) are calculated and evaluate how to streamline them to ensure accurate planning and reporting.

**Foster partnerships and conduct public outreach.** The current leadership should continue to aggressively work to engage the community and parent stakeholder groups by offering educational/training workshops and consistently responding to and addressing parent feedback in a timely manner.

**ORGANIZATIONAL STRUCTURE**

The current MPS organizational chart shows that the Director of Pupil Personnel Services reports to the Assistant Superintendent for Curriculum and Human Resources. In many districts across the US, there is a similar reporting structure, with a Special Education Director reporting to an Assistant Superintendent of Curriculum. This set up allows for collaborative initiatives, such as building inclusive programs and services to meet the instructional needs of diverse learners, to extend across special education and general education environments. As reported in numerous focus groups, the Director of Pupil Personnel Services is fully integrated into all District leadership conversations, which demonstrates that the current organizational structure is conducive to supporting the District’s inclusive vision philosophy. Though it was reported that the Director of Pupil Personnel Services and the Assistant Superintendent of Curriculum and Human Resources communicate daily, they should schedule regular meetings in order to proactively plan for and measure progress on key initiatives.

According to the District’s organizational chart and supplemental information provided by MPS, the following positions report to the Director Pupil Personnel Services:
- **Administrative Assistant (1.0 FTE).** The duties for this position include the special education budget, Circuit Breaker applications, McKinney-Vento support, tutoring, and preschool billing.

- **Out of District (OOD) eSped Coordinator (1.0 FTE):** This position is 0.8 dedicated to out of district placement coordinator responsibilities and 0.2 to eSped. This split was created at the start of the 2015-16 school year.

- **Inclusion Specialist (1.0 FTE).** This position was created at the beginning of 2015-16 school year and is currently filled by a well-respected former LEAP teacher in the District.

- **Physical Therapist (1.0 FTE).** MPS employs 1 Physical Therapist to address the needs of students district-wide.

- **Board Certified Behavior Analyst (BCBA) (1.0 FTE).** MPS has 1 BCBA employee on staff to all support students with behavior challenges.

- **School Psychologists (3.2 FTEs).** The District has 3.2 FTE of school psychologist positions.

- **School Based Staff.** The following positions jointly report to the Director of Pupil Personnel Services and the principals of the school buildings to which they are assigned:
  - Speech Therapists (6.8 FTEs)
  - Team Chairs (6.8 FTEs)
  - Adjustment Counselors (7.5 FTEs)
  - Occupational Therapists (3.8 FTEs)

Figure 7.1. Special Education Staff by Building

<table>
<thead>
<tr>
<th>Collicot Elementary School: 681 Students, including 75 students with IEPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>School</td>
</tr>
<tr>
<td>-------------------------------</td>
</tr>
<tr>
<td>Preschool Support</td>
</tr>
<tr>
<td>Substantially Separate PK</td>
</tr>
<tr>
<td>Substantially Separate KPK</td>
</tr>
<tr>
<td>Integrated PK</td>
</tr>
<tr>
<td>Building Support</td>
</tr>
<tr>
<td>NECC</td>
</tr>
<tr>
<td>Partners</td>
</tr>
<tr>
<td>Collicot Total</td>
</tr>
</tbody>
</table>

| Cunningham Elementary School: 501 Students, including 79 students with IEPs |

---

40 Special education teachers and paraprofessional staff report to the building principal.

41 As noted in the charts, some resources, such as Team Chairs, provide support to the entire building.
<table>
<thead>
<tr>
<th>School</th>
<th>Special Education Teacher</th>
<th>Paraprofessional (Classroom, ABA and 1:1)</th>
<th>Certified Nursing Assistant</th>
<th>Team Chair</th>
<th>Speech Language Therapist</th>
<th>Occupational Therapist</th>
<th>Adjustment Counselor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building Support</td>
<td>2.5</td>
<td>3.0</td>
<td>-</td>
<td>1.0</td>
<td>0.8</td>
<td>1.0</td>
<td>1.0</td>
</tr>
<tr>
<td>LEAP I</td>
<td>1.0</td>
<td>1.5</td>
<td>1.0</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>LEAP II</td>
<td>1.0</td>
<td>2.5</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Cunningham Elementary Total</td>
<td>4.5</td>
<td>7.0</td>
<td>1.0</td>
<td>1.0</td>
<td>0.8</td>
<td>1.0</td>
<td>1.0</td>
</tr>
</tbody>
</table>

**Glover Elementary School:** 574 Students, including 80 students with IEPs

<table>
<thead>
<tr>
<th>School</th>
<th>Special Education Teacher</th>
<th>Paraprofessional (Classroom, ABA and 1:1)</th>
<th>Certified Nursing Assistant</th>
<th>Team Chair</th>
<th>Speech Language Therapist</th>
<th>Occupational Therapist</th>
<th>Adjustment Counselor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building Support</td>
<td>1.0</td>
<td>-</td>
<td>-</td>
<td>1.0</td>
<td>1.0</td>
<td>0.8</td>
<td>1.0</td>
</tr>
<tr>
<td>Co-taught</td>
<td>5.0</td>
<td>5.0</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>STEP</td>
<td>2.0</td>
<td>4.0</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Glover Total</td>
<td>8.0</td>
<td>9.0</td>
<td>-</td>
<td>1.0</td>
<td>1.0</td>
<td>0.8</td>
<td>1.0</td>
</tr>
</tbody>
</table>

**Tucker Elementary School:** 423 Students, including 37 students with IEPs

<table>
<thead>
<tr>
<th>School</th>
<th>Special Education Teacher</th>
<th>Paraprofessional (Classroom, ABA and 1:1)</th>
<th>Certified Nursing Assistant</th>
<th>Team Chair</th>
<th>Speech Language Therapist</th>
<th>Occupational Therapist</th>
<th>Adjustment Counselor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building Support</td>
<td>2.0</td>
<td>-</td>
<td>-</td>
<td>1.0</td>
<td>0.8</td>
<td>0.6</td>
<td>1.0</td>
</tr>
<tr>
<td>Co-taught</td>
<td>3.0</td>
<td>2.0</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>STEP</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Tucker Elementary Total</td>
<td>5.0</td>
<td>2.0</td>
<td>0</td>
<td>1.0</td>
<td>0.8</td>
<td>0.6</td>
<td>1.0</td>
</tr>
</tbody>
</table>

**Pierce Middle School:** 901 Students, including 121 students with IEPs

<table>
<thead>
<tr>
<th>School</th>
<th>Special Education Teacher</th>
<th>Paraprofessional (Classroom, ABA and 1:1)</th>
<th>Certified Nursing Assistant</th>
<th>Team Chair</th>
<th>Speech Language Therapist</th>
<th>Occupational Therapist</th>
<th>Adjustment Counselor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building Support</td>
<td>3.0</td>
<td>4.0</td>
<td>1.0</td>
<td>1.0</td>
<td>0.1</td>
<td>1.5</td>
<td></td>
</tr>
<tr>
<td>Team Taught Inclusion</td>
<td>6.0</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
</tbody>
</table>
### ADDITIONAL STAFFING RECOMMENDATIONS

Given the programmatic and school-based responsibilities of Pupil Personnel Services office, the perception that additional positions are needed appears to be justified. As mentioned by focus group participants, it is difficult to provide quality support and grow programs when spread so thin. Further, given that the recommendations in this report are far reaching, MPS should consider augmenting current staff positions to carry out this work.

The following is a list of positions that MPS should consider adding as part of its mission to improve the academic achievement of students with disabilities:

- **Board Certified Behavior Analyst (BCBA) (1.0 FTE).** Given the broad array of behavior challenges students exhibit, the District could benefit from an additional BCBA position.

- **Coordinator for Data, Compliance, and eSped (1.0 FTE).** The intent of this position to strengthen the department’s internal operations and develop structures to streamline data collection and reporting for state and federal reporting measures, improve usage of the special education IEP system, and ensure the District is compliant with all state and federal technical advisories. Further, adding this position will allow the Pupil Personnel Services Director to spend time focused on instructional support. This role would complement the current district data specialist.

- **French-Speaking Psychologist (as needed).** This position can be filled by a contractor on an as needed basis in order to conduct evaluations for students in the French Immersion program.

- **Special Education Parent Ombudsman (0.5 FTE).** This position will act as a liaison between the Director of Pupil Personnel Services, the District’s Parent Ombudsman, and the Special Education Parent Advisory Committee (SEPAC), and serve as a voice for parents of children with special needs. He/she will also provide training for parents and others, disseminate communication, and create a resource library for parents.

- **Clinical supervisor for adjustment counselors and psychologists (1.0 FTE).** This position will coordinate specific training for these personnel groups, offer professional guidance for all staff, and help the District expand its social/emotional wellness curriculum.

- **Middle School Language-Based Teacher (1.0 FTE).** This position will help support students in special education in who need more intensive support than what they currently receive through a co-teaching class.
Special Education & Related Services: Personnel Ratios and Support

Each District school has staff to support the provision of special education and related services, including special educators, paraprofessionals, and related service personnel, such as psychologists and speech therapists. Focus groups shared the following positive attributes about the school based special education staff in MPS and their commitment to providing quality services for students with special needs:

- “The staff are wonderful - they really care about kids and are knowledgeable. They work hard to serve students and help them get what they need.”
- “The special educators have a positive relationship with the general educators in their buildings and work in concert to support children’s learning.”
- “The related service providers work together as a solid team and offer real, legitimate collaboration with teachers.”

These anecdotes highlight how strong staff can make an impact on the delivery of special education services. Teaching and learning for students receiving special education services are also impacted by school district staffing patterns and usage. In this section, information is provided that compares MPS staffing ratios to other school districts. The information used to compare MPS staff ratios to other school districts was provided through a survey conducted by the Urban Special Education Leadership Collaborative, which was supplemented by data from reviews conducted independently, or with the Council of Great City Schools and Public Consulting Group. Data from 51 other school districts provide a general understanding of districts’ staffing levels in the following areas: special educators, paraprofessional aides, speech/language pathologists, psychologists, social workers, nurses, occupational therapists, and physical therapists. See Appendix E for detailed information for each surveyed school district. These data do not give precise district comparisons, and the results need to be used with caution. District data are not uniform (e.g., including or excluding contractual personnel) 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. MPS has provided detailed staff ratios by school for special educators, paraprofessionals, speech/language pathologists, psychologists, counselors, occupational therapists, and physical therapists. When informative, relevant information is referenced below.

SPECIAL EDUCATION TEACHERS AND PARAPROFESSIONAL AIDES

This section provides information about MPS special education teacher and paraprofessional aide staffing ratios compared to other school districts, and feedback about their availability and use.

Comparison of Staffing Ratios

As reported in Figure 7.2, MPS has an overall average of 11.7 students with IEPs (including those with speech/language needs only) for each special educator. This average is lower than the 14.4-student average of all districts in the survey, ranking the MPS as 14th among the 52 districts. MPS has an overall average of 10.6 students with IEPs for each paraprofessional aides, which is 4.9 fewer students than the all-district average of 15.5 students, ranking MPS as 13th of the 52 responding districts.

Figure 7.2. Average Number Students with IEPs for Each Special Educator and Paraprofessional Aides

<table>
<thead>
<tr>
<th>Areas of Comparison</th>
<th>Special Educators</th>
<th>Paraprofessional Aides</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of MPS Staff FTE</td>
<td>52.4</td>
<td>57.7</td>
</tr>
<tr>
<td>MPS Student w/IEP-to-Staff Ratios</td>
<td>11.7:1</td>
<td>10.6:1</td>
</tr>
</tbody>
</table>

Sue Gamm, Esq. compiled and continues to maintain this list. She grants PCG permission to use the data in reports.

Ranking begins with districts having a low average number of students to one staff person.
Milton Public Schools | Special Education Review

All District Average Ratios

| MPS Ranking Among Districts | 14th of 52 reporting districts | 13th of 52 reporting districts |

SPECIAL EDUCATION CO-TEACHING PAIRS

MPS has sub-optimally articulated or communicated methodology that reflects how co-teaching pairs are selected. The areas below reflect several concerns expressed by focus group participants regarding the assignment and use of special education teachers, specific to the co-taught classrooms.

- There is a perception that there are not enough staff to deliver co-teaching well, especially at the middle school level.
- Co-teaching pairs report a desire for more effective collaboration time. This desire is particularly strong when a special educator has multiple general education teacher partners. For example, during one focus group session, a special educator shared that she team teaches with two general education teachers over four class periods each day. For three of these periods, she is with the same general education partner. They are able to plan more effectively and truly work as a team. On the other hand, she feels like she is a “glorified aide” in the classroom with the other general education partner. They have little time to plan so the classroom defaults to general educator leading the lesson each day.
- There is no written guidance around co-taught class sizes, though the District adheres to the best practice of capping the elementary co-taught classes at 18 with fewer than half the students on IEPs. This practice becomes less clear at the middle and high school levels.
- There is confusion about the inclusion of students with Section 504 plans in the co-taught setting. Some focus group participants believed they were included, while others noted that their participation was not allowed. District practice is that 504 students can be included in co-taught classrooms, but are not counted as having IEPs.

PARAPROFESSIONAL AIDES

Like other school districts, MPS uses paraprofessional aides for programmatic support (prescribed based on established program parameters and students in a particular school’s program) and for individual or groups of students to support their IEP designated needs. The District has a larger number of paraprofessionals than special education teachers, and while paraprofessionals play a large role in supporting students with disabilities in the general education and special education classrooms, focus group participants shared that more structures could be in place to strengthen the support they provide. Paraprofessionals do not attend IEP meetings or participate in any planning related to classroom activities. It is the District expectation that all paraprofessionals are responsible for knowing the IEP of their students. Yet some focus group participants reported that paraprofessionals have to specifically request to see the IEPs of the students in order to receive them, even though 19% of the aides are assigned as a one-to-one student support. The District should be commended for including paraprofessionals in District trainings. Given the multitude of roles that a paraprofessional aide can play, the District should continue to analyze the use of these personnel throughout the year to determine if they are needed, how they can be organized to improve instructional outcomes for students, and what goals should drive their work.

RELATED SERVICE PROVIDERS

This section provides information about MPS related service provider staffing ratios compared to other school districts, and feedback about their availability and use.

Staff Ratio Comparisons for Psychologists, Speech/Language Pathologists, Social Workers/Adjustment Counselors, Nurses, Occupational Therapists and Physical Therapists
Staffing ratios and other data regarding related-services personnel are summarized below and detailed in Figure 7.3.

**Psychologists.** There is one District psychologist for an average of 190.9 students with IEPs compared to the surveyed District average of 195.3 students, ranking MPS as 26th of the 44 reporting districts.

**Speech/Language Pathologist.** There is one District speech/language pathologist (SLP) for an average of 89.9 students with IEPs compared to the surveyed district average of 109 students, ranking MPS as 25th of the 51 reporting districts.

**Social Workers/Adjustment Counselors.** There is one District social worker/adjustment counselor for an average of 81.5 students with IEPs compared to the surveyed district average of 230 students with IEPs, ranking MPS as 9th of the 36 reporting districts.

**School Nurses.** There is one District nurse for an average of 102 students with IEPs compared to the surveyed district average of 172 students with IEPs, ranking MPS as 9th of the 16th reporting districts.

**Occupational Therapists (OT).** There is one District OT for an average of 161 students, which is much less than the surveyed District average of 420 students, ranking MPS as 8th of the 50 reporting districts.

**Physical Therapists.** There is one District physical therapist for an average of 611 students, which is much less than the surveyed district average of 946 students, ranking MPS as 17th of the 50 reporting districts.

**Figure 7.3. Ratios of Students with IEPs to Staff for Related Service Providers**

<table>
<thead>
<tr>
<th>Related Service Areas</th>
<th>Psychologists</th>
<th>Speech/Language Therapists</th>
<th>Social Workers/Adjustment Counselors</th>
<th>Nurses</th>
<th>OTs</th>
<th>PTs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of MPS Staff FTE</td>
<td>3.2</td>
<td>6.8</td>
<td>7.5&lt;sup&gt;44&lt;/sup&gt;</td>
<td>6</td>
<td>3.8</td>
<td>1</td>
</tr>
<tr>
<td>MPS Students w/IEP-to-Staff</td>
<td>190.9:1</td>
<td>89.9:1</td>
<td>81.5:1</td>
<td>102:1</td>
<td>161</td>
<td>611:1</td>
</tr>
<tr>
<td>MPS All Students-to-Staff</td>
<td>1,289.4:1</td>
<td>606.8:1</td>
<td>550:1</td>
<td>688:1</td>
<td>1085.8:1</td>
<td>4,126:1</td>
</tr>
<tr>
<td>Average of All District Ratios (Students w/IEP-to-Staff)</td>
<td>195.3:1</td>
<td>109:1</td>
<td>230:1</td>
<td>172:1</td>
<td>420:1</td>
<td>946:1</td>
</tr>
<tr>
<td>MPS Ranking</td>
<td>26th of 44 reporting districts</td>
<td>25th of 51 reporting districts</td>
<td>9th of 36 reporting districts</td>
<td>16th of 36 reporting districts</td>
<td>8th of 50 reporting districts</td>
<td>17th of 50 reporting districts</td>
</tr>
</tbody>
</table>

**SUPPORT FOR SCHOOLS**

**Psychologists**
Focus groups participants shared that the school psychologists provide helpful resources for school staff and welcome the feedback and recommendations they provide. While the psychologists are considered district

<sup>44</sup> This figure represents adjustment counselors and does not include district guidance counselors.
resources from a budgetary and allotment perspective, they operate as school based staff. As a result, it was reported that there is disparity between caseloads of the psychologists.

**Adjustment Counselors**

In recent years, the District has invested in adding Adjustment Counselor positions so that there is at least one in every school building. Focus group participants attested to the value of these high caliber staff and the support they bring to students with IEPs who require social, emotional, and/or behavioral support.

While their roles vary slightly by building, these staff actively manage many duties: participating in Student Support Team, Section 504, and IEP meetings; managing testing accommodations; leading lunch groups and in class support for students; helping connect parents to outside resources (e.g., doctors, therapists, etc.); and monitoring the academic progress of students with IEPs in their schools. Caseloads differ for adjustment counselors, with the average of 20-30 for each elementary school, 300-340 in the middle school, and 250-275 in the high school. Given the size of their caseloads and the often complex needs of the children they serve, adjustment counselors often operate as solo staff in their school buildings. The District should explore the possibility of adding a centrally based clinical supervisor to lead the adjustment counselor staff. This position would provide cohesion and leadership for implementing the District’s social/emotional wellness curriculum and offer professional advice to the adjustment counselors when they need support, guidance, and training.

**Speech Therapists, Physical Therapists, and Occupational Therapists**

A few concerns were expressed regarding the provision of related services, which are summarized below:

- **Progress Monitoring.** Speech therapists are required to complete quarterly progress reports which are related to measurable goals and objectives. They are expected to take data regularly in accordance with IEP expectations. While this standard exists, the methodology varies. There is no consistent process for collecting and organizing data to monitor the progress of students who receive speech/language services, and various methodologies are used. A more uniform process could provide valuable data about the effectiveness of services and how they could be improved for students with various needs.

- **Scheduling.** There is a general concern expressed by focus groups of the challenges faced when trying to schedule therapy sessions, especially make-up sessions, with students. The District may want to explore various schedules to allow therapists the time they need to deliver services and complete their other workload assignments.

**Team Chairs**

As noted above, the District has 6.8 FTE Team Chair positions; each school building (Collicot, Cunningham, Glover, Tucker, Pierce, and Milton High School) has a Team Chair. The preschool also has a Team Chairperson (0.5 FTE), a new position this school year. Focus group participants noted that this addition has been a positive one for parents of preschool aged children and for staff in the preschool, pre-K, and kindergarten teachers.

The Team Chair is a 10 month position that provides overall case management for students with IEPs in each building. Job responsibilities include:

- Scheduling, facilitating, and chairing all annual IEP meetings and IEP meetings held as issues arise
- Coordinating and scheduling all initial evaluation and reevaluation meetings
- Managing and participating, along with other team members, in the evaluation/reevaluation and IEP writing
- Monitoring student progress, in conjunction with classroom teacher(s) and related service providers
- Managing special education documents (e.g, progress reports, ESY reports, IEP invitations, etc.) and corresponding with parents
• Distributing paper copies of IEPs to all staff in their buildings at the beginning of the school year and create master school binder for related service providers and principals
• Entering all IEP and other special education documentation records in eSped and verifying data against Admin Plus 2-3 times/year\(^45\)

While Team Chairs have many responsibilities, which can vary slightly school to school, one thing they do not do is provide direct instruction or service delivery to students on their caseloads. Many focus group participants noted the benefit of this set-up, in that Team Chairs can offer objective feedback for IEP teams and remain a neutral voice for parents and District staff in the IEP process. This arrangement also allows teachers to maintain positive relationships with parents in the event the IEP team and parent disagree on the provision of services. Though Team Chairs essentially serve as department chairs for special education in their buildings, they are included in Unit A with their peer teachers.

Team Chairs are required to print out their caseloads monthly from eSped and submit the document to the Pupil Personnel Services Director. As the District moves to create more efficient data systems, the Department should explore ways in which these data can be pulled directly at the central office level to eliminate the time spent duplicating this information.

Team chairs indicated wanting more targeted professional development relevant to the role they play in the district.

**Inclusion Specialist**

Focus group participants unanimously agreed that the addition of the Inclusion Specialist is an affirmative one, especially as the District continues to act upon its inclusion philosophy. Since the role is new for the 2015-16 school year, many questions still remain as to the focus of this position and where the Inclusion Specialist should spend her time. Some view the role as case by case support, while others view it as in-class teacher coaching. In the first few months of school, the Inclusion Specialist has conducted outreach to every building, met with each building principal, and monitored the sub-separate programs. She has also: observed the co-taught classrooms, recruited qualified paraprofessionals to work as one-to-one aides, worked with the Reach program to develop processes for inclusion, and worked in high school classes alongside teachers.

In order to bring focus to this important work, the Director of Pupil Personnel Services should work with the Inclusion Specialist to create a work plan, including goals and progress reporting, for the remainder of the 2015-16 school year and for subsequent school years. They should meet weekly to prioritize requests for support and jointly seek out resources that can be shared to increase the knowledge base of all teachers. As part of this work plan, the Inclusion Specialist, and other teachers to the extent possible, should observe high quality inclusion programs districts in Massachusetts and elsewhere.

**Staff Position Allocations**

The District does not appear to have written guidance on caseload limits or a documented process for determining special education position count, as supported by student data, for each school year. The Superintendent, Assistant Superintendent and PPS Director meet quarterly with each principal to analyze student achievement data/ internal assessments in order to reassign existing staff based on the academic needs of the students. Schedules are reviewed regularly to insure compliance with IEPs and contractual teaching loads. Focus group participants shared that the District leadership is responsive and willing to add staff when principals bring a need to their attention. Related service providers work as a team, communicate regularly, and often support each other to ensure evaluation and service delivery requirements can be met.

\(^45\) Based on PCG’s data collection this practice has already been updated. Team chairs must now record all changes to esped and submit to the registrar on a regular (i.e. immediate basis) so that this data can be entered in to Admin Plus.
Technology Use

TECHNOLOGY IN THE CLASSROOM

There has been a huge influx of technology in recent years, and school districts, like MPS, are trying to figure out how best to integrate these new tools into the classroom, how best to store new devices, and how to make them accessible for students with special needs. Teachers across the district are using a combination of district supported online resources, such as, Study Island, Everyday Math, etc., along with teacher requested online resources, to which building leadership often funds. Special educators, in particular, see the value of tools like BookShare and Audible to help students’ access text in different ways. Based on the school population and the request of teachers buildings may have access to a variety of different online resources, along with the common resources shared throughout the district.

Milton has begun to use Google Apps for Education district-wide with everyone, including all students in grades 2-12 having Google accounts. Teachers and students minimally use Google documents to share resources and collect data. Many teachers throughout the district have also begun to utilize Google Classroom as a classroom management tool. Through the District wide Director of Educational Technology, staff are given individualized and small group support with the use of the devices as well as the Google Tools available. Professional Development strands of up to seven hours are offered in various facets of technology and are available to all staff. The district also subscribes to an online professional development website which offers over 1,000 webinars in technology, to which 96 staff across the district are currently enrolled and participate in.

ASSISTIVE TECHNOLOGY

According to the National Dissemination Center for Children with Disabilities, assistive technology increases a student’s opportunities for education, social interactions, and potential for meaningful employment. It also supports a student’s participation in learning experiences in the least restrictive environment. Assistive technology is a tool to help students benefit from the general education curriculum, and access extracurricular activities in home, school and work environments.46

In September 2014, MPS staff presented to the School Committee a plan for addressing the special education achievement gap47, which included information about how assistive technology can support this focus. The presentation included the following updates:

- iPads, laptops, and Chromebooks are now in every school
- Students who previously required scribes are instead being acclimated to keyboards, allowing more independence
- Communication software, such as Pro Lo Quo, was made available for non-verbal students
- Technology such as a “camera mouse” which focuses on facial movements has been used to help students communicate. Use of books on tape (and downloaded) now available through various programs
- Continued implementation of FM systems, sound field towers, and headsets/microphones for hearing impaired students
- Special Education Assistive Technology Consultant

46 http://nichcy.org/schoolage/iep/meetings/special-factors/considering-at
47 http://www.miltonps.org/committee-presentations.php
In MPS, there does not appear to be one office responsible for procuring and managing AT devices and developing a larger strategy around the integration of these devices for students in the classroom. In some cases, the principal orders specific items, while in other cases the Technology Department completes the order and provides follow up training for school staff.

A few additional areas of concern are summarized below.

- **Criteria for Need.** MPS does not appear to have a checklist or criteria for determining the need for AT. The decision for which devices to provide for a student is a shared decision by the team.
- **Knowledge of AT Devices.** Last year the SEPAC hosted an AT presentation, but it was reported that there was no follow up within the District. Special education staff meet with the Director of Educational Technology to receive support with the devices being purchased.
- **Awareness of AT.** Some focus group participants expressed concern that teachers and parents do not have sufficient information about AT and the referral process. Information about AT and the referral process was not found on the MPS general or special education website.
- **Lost Devices.** MPS does not have a policy or procedure for addressing lost AT devices in a uniform manner.
- **Strategic Plan for AT.** Focus group participants shared that schools often just use what is in the building to fulfill an AT need, rather than to explore the newest devices and understand what resources are available for students of varying need. Rather than depend on parents or advocates to provide AT recommendations, MPS should conduct a needs analysis, investigate new devices, and educate teachers and school staff on AT devices.

**Professional Development**

High quality professional development must be sustained, intensive, and classroom-focused (not one-day or short-term workshops or conferences) to have a positive and lasting impact on classroom instruction and the teacher’s performance in the classroom. Research reports that elementary school teachers who received substantial professional development—an average of 49 hours—boosted their students’ achievement by about 21 percentile points.

Quality teaching in all classrooms and skilled leadership in all schools will not occur by accident. They require the design and implementation of the most powerful forms of professional development.

The National Staff Development Council’s *Designing Powerful Professional Development for Teachers and Principals* is based on a three-part premise:

- Quality teaching makes a difference in student learning;
- Teachers and principal professional learning is a central factor in determining the quality of teachers; and
- District structures and culture surrounding school play a critical role in determining the quality of professional learning experienced by teachers and principals.

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The text box below provides the definition of professional development provided in the glossary for the In TASC Model Core Teaching Standards.

**Professional Development**

Professional development provides comprehensive, sustained, and intensive learning opportunities to expand the professional knowledge base available to teachers and to engage them in an ongoing process of critically examining their teaching practices to find new and more effective ways to improve student learning. Professional development needs to address both an individual teacher’s goals for professional growth and the larger organizational learning priorities for school improvement. Professional learning engages teachers in working with others to deepen their content knowledge, sharpen their instructional skills, and develop their ability to use data for meaningful decision-making. Thus, professional learning is an ongoing, job-embedded process that supports transfer of newly learned knowledge and skills to practice. Such learning also needs to be continuously evaluated and refined.

Focus group participants expressed a need to look at MPS’s structure for and level of staff development necessary for special/general educators and others involved in the education of students with IEPs. Parents, in particular, expressed a desire for more professional development for teachers, especially in the areas of social/emotional support and inclusive practices.

**STRUCTURE FOR PROFESSIONAL DEVELOPMENT**

For the 2015-16 school year, the District had three all-day professional development sessions (August 31, September 1, and October 9) and four half-day sessions (December 2, January 13, March 2, and April 6) scheduled. On these days, teachers and related service providers attend a combination of district-sponsored and school-specific trainings. Principals, Coordinators and Department Heads collaborate at the beginning of the year and between sessions to plan based upon the needs of the district, schools, departments and students. Though the professional development times are published on the school calendar in advance of the start of the school year, it was reported that teachers and related service providers often do not know which sessions will be provided until a day or two ahead of time. Many expressed a desire to see a professional development calendar for the entire year.

The district offers an array of professional developments outside of the school day. These opportunities are developed by a committee of teachers and administrators. Any teacher can submit a topic that may be considered relevant to their colleagues.

It was also reported that teachers attend professional development outside of their school day and regularly pay for these sessions themselves. Many have sought out professional development sessions outside of the District because they have not felt that the sessions provided by MPS does not meet their needs. On a related note, adjustment counselors and guidance counselors must seek out and pay for the professional development required to maintain their licensure, as District-sponsored professional development has not addressed this in the past. Focus group participants expressed a strong desire for additional professional development at all levels of the organization, and training for parents, on myriad topics, examples of which are provided below.

**AREAS OF PROFESSIONAL DEVELOPMENT**

Focus group participants commended the District’s decision to have Dr. Thomas Hehir from Harvard University provide an opening session at the beginning of the 2015-16 school year for all teachers around inclusive practices. Many said that though they have a lot more work to do to implement effective inclusionary practices, focusing on this topic at the school opening sent a strong statement that the District is committed to improving the educational
outcomes of students with disabilities and those other social/emotional/intellectual differences. They attribute this positive decision to the influence and forward thinking of the new Director of Pupil Personnel Services.

With that said, focus group participants expressed a general concern that the professional development over the past few years in the area of special education has not met the learning needs of the entire staff. This applies to training for general educators to teach students with disabilities, for special educators and related service providers, and for paraprofessionals. Many expressed optimism that this will change as the new Director of Pupil Personnel Services begins to drive this forward. The extensive professional development that has occurred this fall has already begun to demonstrate this positive change.

Paraprofessional training:

- August 31, 2015- "Helping Students in the Classroom" (eligibility process, disabilities, IEPs, expectations of the role)
- December 2, 2015- "Understanding the IEP Process" (Collaboration, eligibility, measurable goals, IEP meetings)
- January 13, 2016- "Supporting Students in Inclusive Settings: The Paraprofessional Experience" (by Dina Traniello) (collaboration, roles, legislation, fostering independence)

Educators/service providers:

- September 1, 2015- "Welcome Back" (service providers) (Department/District priorities, use of data at IEP meetings, measurable goals)
- September 1, 2015-service providers-"Principles of Social Cognition: Practical Strategies for Helping Individuals with Social Cognitive Deficits Succeed: A Language Processing Perspective" (Sean Sweeney from Ely Center) (Social cognitive deficits, social pragmatics, executive functioning, classroom strategies)
- September 14, 2015- "Section 504 Review and Data Collection"-(guidance counselors and adjustment counselors, team chairs) (504 criteria, process, rights, forms, data collection)
- October 9, 2015-"Instructing Students with Special Needs" (entire middle school faculty) (overview of disabilities, accommodations, modifications, grading, IEPs).
- October 9, 2015 "The Team Approach and Writing Measurable Goals (Milton High Special Educators, Occupational Therapists, Physical Therapists, Adjustment Counselors, Speech/language Therapist) (IEP teams, measurable goals, use of data at meetings/collection of data)
- October 9, 2015 "Social Pragmatic Skills" (with Sean Sweeney) (Speech/language therapists, adjustment counselors) - Creating school wide plans to address social pragmatic/social emotional skills.
- November 2, 2015 "IEP and Writing Measurable Goals (Collicot/Cunningham special education staff (teachers, team chairs, service providers)

Focus group members provided the following feedback about the District’s professional development needs and areas in which they would like more training. Many of these topics were also included in the “Addressing the Achievement Gap in Special Education” presentation to the School Committee in September 2014.51 While the district has completed training already on a number of these topics, focus group participants expressed wanting to go deeper. Topics include:

- Best practices around and the methods of inclusion and co-teaching for all teachers
- Consistent understanding and application of accommodations vs. modifications in IEPs
- How continuity of instruction and vertical alignment can and should look between grades

51 http://www.miltonps.org/committee-presentations.php
- Understanding resources available to support students with social/emotional issues, “toolkit” for supporting students exhibiting challenging behaviors, and access to a social/emotional/wellness curriculum.
- Legal and compliance training so teachers feel they are up to date on state and federal requirements\(^{52}\)
- Training on online curriculum resources, like Everyday Math, for special education teachers.
- Sessions focused on the needs of different provider groups (i.e., adjustment counselors, speech therapists, psychologists, etc.)
- Resources to improve behavior and classroom management
- Training on how to effectively use technology in the classroom.
- Understanding and applying the principles of Universal Design for Learning
- Using data to determine focused interventions
- How to implement RtI/MTSS intervention models
- Understanding, efficacy, and use of assistive technology

**Fiscal Issues**

As with all school districts across the country, the area of special education is seen as a constant for expanding costs. There is a perception, however, that the MPS leadership has stopped spiraling costs by placing a concentrated effort on bringing students previously placed in out of district settings back to District schools. The following figures reflect fiscal data pertaining to special education spending.

**DISTRICT SPECIAL EDUCATION EXPENDITURES\(^{53}\)**

Figure 7.4 below shows the percent of MPS spending in the 2013-14 school year for the area of Pupil Personnel Services as compared to five other Massachusetts districts and the state. These data show that MPS’s spending rate of 6.7% is less than the state’s 8.6%. The spending percentages for the six districts range from a high of 10.3% in Walpole to low of 5.9% in Burlington. Only 1 school district, Burlington, has a lower spending rate than MPS.

**Figure 7.4. Percent of Special Education Spending of Total: MPS vs. Comparable Districts and State (2013-14)\(^{54}\)**

![Figure 7.4. Percent of Special Education Spending of Total: MPS vs. Comparable Districts and State (2013-14)](image)

Figure 7.5 reflects the growth in special education per pupil cost and special education enrollment from 2005-06 to 2013-14. During these school years, the per pupil special education cost increased from $10,204 to $14,544. At the

\(^{52}\) The district currently dedicates professional development time in having our Special Education attorney provide updates for all staff and has created a video that all staff must view and sign off on annually.

\(^{53}\) http://profiles.doe.mass.edu/state_report/ppx.aspx

\(^{54}\) Does not include Payments to Out of District Schools
same time, the number of children and youth with IEPs, including children in birth-to-five programs, decreased from 603 to 547.

**Figure 7.5. Nine-Year Comparison of Total MPS Special Education Cost & Total Special Education Enrollment**

![Graph showing nine-year comparison of total MPS special education cost and total special education enrollment.]

This figure shows that the rate of total Pupil Personnel Services spending has increased from 2005-06 (5.3%) to 2013-14 (6.7%).

**Figure 7.6. Percent of MPS Pupil Personnel Spending from 2005-06 to 2013-14 Budget**

![Graph showing percent of MPS pupil personnel spending from 2005-06 to 2013-14 budget.]

Figure 7.7 shows that the rate of total Out of District Placement spending percentage of the budget has decreased from 2005-06 (11.0%) to 2013-14 (8.5%). However, actual costs for Out of District Placements increased from $4,144,888 to $4,454,393.

**Figure 7.7. Percent of MPS Out of District Placement Spending from 2005-06 to 2013-14 Budget**

![Graph showing percent of MPS out of district placement spending from 2005-06 to 2013-14 budget.]

Costs include Pupil Personnel and Out of District Placements. Student totals include special education students in district programs and in out of district placements.
Figure 7.8 shows that the rate of total special education spending (Pupil Personnel Services and Out of District Placements combined)\(^{56}\) has decreased from 2005-06 (16.4%) to 2013-14 (15.3%).

![Figure 7.8. Percent of MPS Special Education Spending from 2005-06 to 2013-14 Budget](image)

**ADVANCEMENT BUDGET**

Through the efforts of the School Administration, the School Committee, and the Warrant Committee\(^{57}\), MPS received an “Advancement Budget,” a three-year dedicated funding source for use in FY 14, FY 15, and FY 16 to increase student outcomes of all students in the areas of Literacy, Science, and Science, Technology, Engineering, and Math (STEM) as well as to accelerate the learning outcomes of targeted groups who were not meeting the level of success expected by the District.\(^{58}\) Specifically, funds were targeted to the following three areas:

1. Emphasizing Early Literacy Achievement (PK-3)
   *Identified Need:* 29% of Milton Public Schools current fourth graders scored below Proficient on their Grade 3 spring 2012 English/Language Arts MCAS.

2. Closing the Achievement Gap (PK-12)
   *Identified Need:* Based on 2012 MCAS results, MPS determined that the following achievement gaps needed focus resources to address.

   At the elementary level, proficiency gaps existed:
   - Between the High Needs (students with disabilities, students identified as low income, and English Language Learners) subgroup and Non-High Needs students in ELA and Math
   - Between African American/Black and Hispanic/Latino in ELA and Math as compared to Asian and White

   At the middle and high school levels, proficiency gaps existed between all subgroups and their counterparts in ELA, Math and STE (Science, Technology/Engineering).

3. Advancing Science and STEM (Science, Technology, Engineering, and Math) Initiatives (PK-12)
   *Identified Need:*
   - At grade five 37% of the students scored Warning or Needs Improvement.
   - At grade eight 52% of students scored Warning or Needs Improvement.

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56 Costs include Pupil Personnel and Out of District Placements.
57 The Warrant Committee is an appointed committee with the primary goal of analyzing financial matters: [http://www.townofmilton.org/Public_Documents/MiltonMA_BComm/WC/WC](http://www.townofmilton.org/Public_Documents/MiltonMA_BComm/WC/WC)
58 Information about the Advancement Budget was taken from numerous School Committee presentations for FY 14, FY 15, and FY 16, which are available on the MPS website: [http://www.miltonps.org/committee-budget.php](http://www.miltonps.org/committee-budget.php)
• At the high school 18% of students scored Warning or Needs Improvement in Biology.

The total Advancement Budget was $1,644,000. Funds allotted for “Closing the Achievement Gap” were meant in part to focus on reducing the gap between students with IEPs and those without. The following chart shows the summary of funding by initiative and fiscal year.

**Figure 7.9. Advancement Budget**

<table>
<thead>
<tr>
<th>Initiative</th>
<th>FY 14</th>
<th>FY 15</th>
<th>FY 16</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Emphasizing Early Literacy Achievement (PK-3)</td>
<td>$242,000</td>
<td>$168,000</td>
<td>$125,000</td>
</tr>
<tr>
<td>2. Closing the Proficiency Gaps (PK-12)</td>
<td>$85,000</td>
<td>$67,000</td>
<td>$248,000</td>
</tr>
<tr>
<td>3. Science/STEM (PK-12)</td>
<td>$188,000</td>
<td>$80,000</td>
<td>$218,000</td>
</tr>
<tr>
<td>4. Support for All Advancement Initiatives</td>
<td>-</td>
<td>$223,000</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>$515,000</td>
<td>$538,000</td>
<td>$591,000</td>
</tr>
</tbody>
</table>

Funds were utilized to hire staff, purchase materials, provide professional development for teachers, and provide extended learning opportunities for students throughout the school year. As was demonstrated in the FY 16 Advancement Budget Presentation to the Warrant Committee conducted on December 18, 2014, the Advancement Budget is having a positive impact on student achievement. Preliminary results show improvements in these areas:

- Internal reading assessments showed significant growth in grades 1 and 2:
  - Grade 1 English students improved from 68% on or above benchmark in September 2013 to 86% on or above benchmark in June 2014
  - Grade 2 English students improved from 81% on or above benchmark in September 2013 to 86% on or above benchmark in June 2014
- District-wide, the gaps in ELA and STE between African American/Black students and white students decreased between 2013 and 2014
- At the middle school, the number of students in the High Needs subgroup who scored Proficient or Advanced in ELA increased by 11%
- At the high school, 96% of students are Proficient/Advanced in ELA, 92% in Math, and 88% in Science

The Advancement Budget is scheduled to conclude at the end of this school year. Many of the initiatives contained in the Advancement Budget are continuing beyond the initial three years. While the improvements funded under this initiative are showing a positive impact, it will take sustained investment to continue the momentum. The Warrant Committee and School Committee should consider adding a permanent budget line item for these initiatives in order to continue the focus on improving educational outcomes for all students.

**SPECIAL EDUCATION BUDGET**

The FY 16 Advancement Budget Presentation to the Warrant Committee, conducted on December 18, 2014, contained a section about special education cost increases. Cost increases were attributed to the following:

1. DESE regulations and refinement of MPS practices
2. Development of MPS special education programs
   a. Investment in long range savings
   b. In absence of services, need to contract out
3. Out of District (OOD) tuition costs
4. Transportation for OOD and Homeless students
5. Stimulus funds eliminated/ Circuit Breaker fluctuations

The District believes that "it is a better practice, both financially and philosophically, to increase the District’s capacity to provide for students in our own community schools, rather than to send them out of Milton to costly Out of District placements." As was reported during focus group sessions, the District has been taking proactive steps to reduce expenditures by developing in-house programs that support a broader range of students with severe needs. The renovation of MPS buildings have also contributed to the District’s ability to bring students back into the public schools, as they are now seen by parents as attractive and welcoming places. The addition of an out of district placement coordinator who places focused attention on communicating with parents has also encouraged many to consider returning to MPS schools. It is the District’s intent to realize long range savings (#2 above) by reducing OOD tuition and transportation costs.

Parent/Family Engagement

Overall, MPS benefits from highly involved parents. They are proactive, organized, and expect results. This general statement also applies to parents of children with special needs as demonstrated by the active engagement of the Milton Special Education Parent Advisory Council (SEPAC).

MPS SPECIAL EDUCATION PARENT ADVISORY COUNCIL

According to its website, the Milton Special Education Parent Advisory Council (SEPAC) is “a parent run, nonprofit organization in Milton, Massachusetts dedicated to providing information, support and advocacy to families with children with special needs and/or learning disabilities in the Milton Public Schools.” It was established in accordance with Massachusetts state statute requiring districts to offer a parental advisory council that offers membership to parents of eligible students.

The organization seeks to foster parent involvement by offering opportunities for parents to get to know each other, communicate information, exchange ideas and suggestions, and provide education and advocacy. The Milton SEPAC has a website which provides information about special education resources in the following areas: Parental Rights; IEP; Disability Definition and Resources; ADHD; Autism; Section 504 of the Rehabilitation Act; No Child Left Behind; MPS Programs, Policies, and Presentations.

The Milton SEPAC Executive Board is comprised of four parents who each have children at different schools and grade levels. There are an additional seven members-at-large. The Board attempts to have representation at MPS School Committee and other school meetings to ensure that students with special needs are addressed during discussions of broader issues, e.g., the achievement gap. Overall, the Milton SEPAC is still growing and working to establish itself as a resource for parents. It may want to consider conducting presentations about its purpose at PTO school group meetings or at other parent-focused group activities.

59 This presentation highlights the increased cost for out of district placements with regards to actual dollars. As noted in the explanation of Figure 7.7 however, the percent of money that this line item represents in the overall district budget has decreased over time.
60 FY 16 Advancement Budget Presentation to the Warrant Committee: http://www.miltonps.org/committee-budget.php
61 http://www.miltonsepac.org/
62 Id.
GIVING PARENTS INFORMATION AND VOICE

One aspect of the Milton SEPAC is to help parents communicate with each other and with the District, and to provide them with information about the special education process, including what the law does and does not require. Board members also spend much of their time listening to parents who, for a variety of reasons, feel like their children are not seen for the assets and benefits they can bring to the classroom and that parental perspectives are not fully valued and taken seriously. They share a concern that parents new to the special education process are not aware of available resources or how to navigate the process. As a whole, parents appreciate the attention of MPS’s new Director of Pupil Personnel Services. They perceive her as actively working to understand the perspective of parents and their concerns.

ACCOUNTABILITY FOR EXPECTED PRACTICES & RESULTS

In the fall of 2011, the Council of the Great City Schools (Council) published its report *Pieces of the Puzzle: Factors in the Improvement of Urban School Districts on the National Assessment of Educational Progress.* The report summarizes preliminary and exploratory research the Council conducted with the American Institutes for Research (AIR) regarding common characteristics in the improving and highest performing urban school districts participating in the National Assessment of Educational Progress’ (NAEP) Trial Urban District Assessment (TUDA). The first of the common characteristics, which is applicable to all school districts regardless of size, pertained to the existence of: clear system wide goals and staff members are held accountable for results, which creates a culture of shared responsibility for student achievement.

MPS’s mission “is to educate, challenge, and empower all students to be productive, caring, and contributing members of society.” To that end, the District has established a brief system that focuses on the conditions upon which children learn best, and the role of parents, community members, and teachers in this process, and the expectation of educational excellent. The District’s vision is to create a “dynamic community that challenges all students to thrive and achieve. Our schools provide a well-funded teaching and learning environment in state-of-the-art facilities. In partnership with the community, we equip our students with the skills and knowledge necessary to adapt and contribute to a changing world.”

Throughout this report, PCG explored and commented upon the extent to which MPS has established and implemented standards for practice and student achievement that pertain to the area of special education. This section discusses MPS’s system of accountability for expected practices and results for students with disabilities and learning challenges.

COMPREHENSIVE STANDARD OPERATING PROCEDURE MANUAL

School systems use policies, which are approved by the School Board, and more commonly a manual of procedures and expected practices, which is developed typically by the special education department, to guide district-wide and school-based activities for the administration and operation of special education. The use of a comprehensive standard operating procedure manual (SOPM) enables all personnel, parents, and other stakeholders to have a consistent understanding of a school district’s expectations regarding special education procedures and practices. Many school systems have an SOPM that is on-line and publicly available. Such a manual does not appear to exist for MPS. During focus group sessions, there was an expressed need for a single comprehensive manual that is user friendly, provides information that is clear, and that offers for a single message. In the absence of such a

document, MPS personnel sometimes provide inconsistent information that can be confusing to other staff and parents.

The Director of Pupil Personnel Services has already begun to create the framework for an SOPM so that it can be available for staff and parents as soon as possible. The SOPM development should involve the broad input of stakeholder groups, align to the Massachusetts state regulations and technical advisories, and be sure to include detail about the following topics:

- The IEP process and how to write measureable, annual goals
- Guidelines for specific learning disability eligibility for students
- Best practices to ensure consistency across IEP meetings
- Roles and responsibilities for IEP team members
- Guidance around grading policies for students with IEPs
- Clarification of regulations around parent signature on IEP documents
- Procedures about how to manage paper and digital records for students receiving special education services

Once the SOPM is completed, the District should conduct professional development for all staff and training sessions for parents on the topics included in the manual.

**Data Use**

**CURRENT DISTRICT PRACTICES**

There was inconsistency among focus groups as to the current expectation of data use across the District. Some groups reported that they look at data routinely, while other groups said that MPS needs a more formal approach to collecting and using data and more user friendly systems. The addition of a District data analyst is a positive step toward providing consistent information. While special education data has not been the focus of this role, special education should be included in all District data reports.

**IEP DATA MANAGEMENT SYSTEM**

MPS uses eSped, a web based product that was customized for the District's IEP teams, to prepare and finalize various special education documents. It is managed by the Pupil Personnel Services office.

Focus group participants said that eSped is not a user-friendly tool that staff feel comfortable or competent in accessing. At the school level, it was reported that only Team Chairs primarily access eSped and that special education teachers have received little training on how to use it. There were some questions regarding the provision of sufficient on-going training, particularly for staff members having difficulties with the program.

Access to eSped’s reporting functionality also seems to be limited. Focus group participants shared that they believe eSped has greater reporting capabilities but that very few staff have been trained well enough to use it effectively. Special education reports are generally pulled from Admin Plus, not eSped, and staff spend significant time trying to reconcile the data reports from each system. It was reported that rosters generated from eSped often show students from several years ago who were either exited from special education services or graduated.

Some focus group participants strongly expressed the need for more data entry staff and personnel to make updates in eSped and Admin Plus. However, others advocated for a new IEP system, one that allows staff to access relevant student data and connect to Admin Plus. The District should explore both routes to determine how best to manage
special education data in the short and long term. Additionally, given the start-up of the parent and teacher portals in the District, MPS should also investigate how to integrate the special education system into these plans.

**SPECIAL EDUCATION WEBSITE**

The District’s current Special Education/Pupil Personnel Services page has contact information for central office personnel and Team Chairs and includes the following documents: PARCC Accessibility and Accommodation Overview for MA Educators, 2014-15 MPS Special Education Programs, Special Education Parents Rights Brochure, Extended School Year (ESY) and Extended Day, and Extended Day Services. The District should consider investing time in substantially expanding and updating the resources available on the website. Doing so would allow all various stakeholder groups to understand the District’s services and for staff to go for additional information. Upon the completion of the SOPM, the District should also post the manual to this site.

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66 http://www.miltonps.org/special-education.php
VIII. RECOMMENDATIONS

1. MTSS. Build on MPS’s RTI process and curricular framework to develop/implement a framework of multi-system of supports (MTSS) for academic achievement, positive behavior, and social/emotional growth (including enrichment) for all students. Although MTSS is a general education initiative that covers all students, it is critically important to special education since 2nd and 3rd tier interventions must be considered during an IEP evaluation.

   a. Framework. Establish a framework for the implementation of MTSS, including a written description and guidelines, for students in grades kindergarten through 12 performing below grade level standards.

   b. Leadership. Under the direction of the Assistant Superintendent of Curriculum and Personnel, engage the District’s leadership team, including school principals, the Administrator of Pupil Personnel Services, etc., and representatives from every educational unit (e.g., World Languages, ELL).

   c. Standards. Confirm or establish standards for universal screening, tiers of increasingly intensive evidence-based interventions, progress monitoring/use of data to make educational decisions, and the engagement of families.

   d. Messaging and Documentation. Develop internal and external materials that explain the connection between MTSS and SST and the research base for following a structured intervention process. Create a 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 MPS.

   e. Instructional Leadership Teams. Establish standards for district-wide and school-based instructional leadership teams regarding the use of problem-solving and data-based decision making at all tiers to match instructional (academic and behavior) resources to need for supporting academic advancement and positive behavior; and supplement teams as needed to support teachers.

   b. Staffing. Designate a district-wide coordinator for MTSS. This individual will have responsibility for the implementation of PCG recommendations related to MTSS. This position may be less than full-time, at least initially, and may be well-suited for an existing staff member.

   a. Reporting. The MTSS coordinator should report directly to the Assistant Superintendent of Curriculum and Personnel, but will need to work closely with a cross-functional district team and school administrators. All work will need to align to initiatives of the Administrator of Pupil Personnel Services.

   b. Role. The MTSS coordinator should be responsible for the consistent district-wide implementation of a culture of tiered intervention for all students, including special education, ELL and academically advanced students. This individual’s role should focus on both development of systems and supports for schools, along with professional development and on-site coaching for school staff. At least initially, this individual should participate in school-based MTSS meetings.

   c. Professional Learning. Provide a high-quality and ongoing professional learning curriculum that will enable principals/all relevant school personnel to implement the above activities (and other recommendations in this report). Identify the core information that various staff members need to implement the framework and differentiate professional learning, and provide a certificate of demonstrated performance.

   d. Cross-Function Training. Initiate cross-function training of administrators and other school support groups from every educational division, including the Finance Office, to expand their knowledge and ability to

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67 This information includes components that are based on the Literacy Education for All, Results for the Nation Act (LEARN Act), H.R. 2272, which if passed would authorize state grants to improve birth through grade 12 literacy.
support school-based personnel. Consider mandating training to ensure that staff members needing professional development receive it.

e. **Content.** Include information related to language development, second language acquisition, consistent progress monitoring, analysis and use of data for decision-making, implementation of scientific research-based interventions at varying levels of intensity, etc.

f. **Parent Involvement.** With parent stakeholder groups, consider how training will be made available for families/caregivers to reinforce activities that will support the learning of their children.

g. **Implementation.** Based on these standards, develop an expedited two-to-three year district-wide implementation plan. As part of this planning process, consider how each school will have access to sufficient evidence-based interventions to meet the needs of most students and access to additional interventions for students with additional needs. As part of this process, consider the fiscal implications of enabling schools to retain special education staff to provide interventions for all students if the need for these teachers is reduced because of lower incidence rates for students with IEPs. Identify staff members who have relevant knowledge/expertise and who could provide training to their peers.

h. **Intervention Models.** Identify models for intervention, including those for ELLs and advanced learners. Consider how students with IEPs may access appropriate interventions with their nondisabled peers for IEP goal areas, with supplemental consultation/collaboration provided by a special educator.

1) **Communication & Feedback.** Establish a timely communication/feedback process to share solutions to implementation barriers. Several problem areas are likely to require a targeted group of knowledgeable people to resolve issues as they arise. For example, schools often have difficulty providing services with existing staff and would benefit from feedback from individuals able to analyze the situation, give meaningful suggestions, and recommend different staffing arrangements.

2) **School-based Planning.** Use a school-based process for planning the framework’s implementation. Provide a template that includes the core components necessary to support successful inclusive practices: school-based planning, professional development, data gathering/review, and support for plan implementation. Integrate the plan with school improvement plans.

i. **Use for Referral/Qualification for Specially Designed Instruction.** Establish standards for the use of MTSS for: referring students for special education evaluations; and using results as part of the process for determining the existence of a specific learning disability, and any other disability areas as permitted by state law/regulations. As part of this consideration, consider research showing the use of MTSS to reduce racial/ethnic disproportionality in the identification of students with disabilities and suspensions.

j. **Accountability.** Include in the District’s system of accountability measurable expectations for implementing the core curriculum and MTSS framework. Establish, communicate, support, and monitor clear expectations and “non-negotiables,” establishing clear lines of accountability and responsibility across departments and schools, aligning them with relevant standards and guidance. Incorporate the expectations into administrator, principal, teacher, paraprofessional aides, and related-service personnel evaluations. Have schools incorporate activities into their school improvement plans that would enable them to meet these expectations.

k. **Financial Models.** Provide examples of how schools can use funds to support MTSS implementation. Consider how funds currently appropriated under Title I and Title III of the Elementary and Secondary Education Act (ESEA) and Coordinated Early Intervening Services (CEIS) funds under the Individuals with Disabilities Education Act (IDEA) may be used to support MTSS. Provide other funding models for school consideration.

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68 Implementing RTI Using Title I, Title III, and CEIS Funds; Implementing RTI Using Title I, Title III and CEIS Funds: Key Issues for Decision-makers at [www.ed.gov/programs/titleiparta/rti.html](http://www.ed.gov/programs/titleiparta/rti.html).
2. EVALUATION PROCESS. Target activities to assess practices for students with disabilities in high-risk areas to inform future practices; and to support appropriate special education evaluation referrals for students in areas of possible under-identification.

   a. Referrals. Develop a centralized system to track all referral and eligibility data, including the referral source. Maintain this information centrally and update frequently. Monitor referrals to determine if schools with a stronger MTSS program see a reduction in unnecessary referrals.

   b. Eligibility. Develop a process to review recent eligibility documentation for students with disabilities. Use a facilitator for school-based personnel to review together random files for students with similar characteristics to identify any patterns and trends, including the extent to which students had received documented progress monitored research-based general education interventions, and their achievement growth after receiving an IEP.

   c. Disproportionality.Monitor the identification of students in a racial/ethnic subgroup to ensure that it is not at least two times more likely than peers to be identified as having a disability area, (i.e., risk ratios). Benchmark initial referrals and eligibility determinations by race/ethnicity in the areas of concern. Twice yearly, track whether the use of MTSS is reducing racial/ethnic disparities in initial referrals and eligibility determinations in these areas. For students who appear to be underrepresented in a disability, provide teachers with information regarding their characteristics to support the appropriate referral of students with these characteristics for an evaluation of their eligibility and any need for special education services.

   d. 504. Ensure schools have the necessary systems in place to identify students who may require a 504 plan. Monitor schools with overly high rates to ensure appropriate identification. Offer training to improve staff understanding. Streamline tracking system to ensure accurate capture of 504 data.

   e. Track Data. Monitor the results of MTSS activities to determine if they are having any impact on the identification of students in areas of concern, and to take follow-up action as appropriate. Also, review data for initial evaluations monthly to ensure mandated timelines are being met.

3. ORGANIZATION OF SPECIAL EDUCATION. Maximize special education support to schools by increasing communication in ways that include but are not limited to the following:

   a. Set a clear, measurable, and long term vision for the department. Essential to the new director’s job will be the development of a cohesive, collaborative vision with clear expectations around the department’s goals for the next 3-5 years. The vision should include quantifiable benchmarks that detail who is responsible and the expected level of progress for each initiative. Spend time crafting this vision collaboratively to ensure school and internal and external community buy-in. The vision should dovetail with expansion of the inclusion vision.

   b. Create efficient data systems. Evaluate the District’s current data systems for collecting student information and financial data related to special education. Determine where duplicate data entry occurs and, to the extent possible, eliminate it. Review compliance data points such as reevaluation and annual IEP dates on a monthly basis. Document how data are tracked and calculated for the State Performance Plan (SPP) Indicators and develop a plan to review these data well in advance of state reporting deadlines.

   c. Foster partnerships and conduct public outreach. Establish regular meetings with the SEPAC and potentially with outside advocacy groups to share departmental updates. Hold regular parent trainings, post additional resources to the District’s website, and disseminate newsletters with upcoming events, departmental updates, etc.

   d. Change Management. Expect that all significant changes that impact a class, school, or groups of schools are communicated broadly and, to the extent possible, consider feedback by relevant stakeholder representatives, including parents.

   e. Inclusion Vision. With stakeholder input, further develop the District’s inclusion vision, goals for
expansion, and measurement on student achievement.

4. **ACHIEVEMENT GAP.** Maintain a district-wide and unrelenting focus on closing the special education achievement gap. Ensure instructional practices and policies support closing this gap. Provide students with IEPs supports and services in general education classrooms to increase their access to rigorous Common Core curriculum. While the District has a laudable number of students currently educated in inclusive settings, take steps to ensure instruction is meaningful and supported. As part of this process:

   a. **Educate.** Ensure all principals and school-based staff understand the district’s special education achievement gap and understand the commitment to close it.

   b. **Define, Provide Guidelines, Training, and Expectations around Teacher Collaboration.** Consider the research base of consultation and collaboration by special educators to support general educators and their instruction of students with IEPs.69

   c. **Maximize the Benefits of Creating Scheduling Priorities.** Schedule students with IEPs first for general education classes. By scheduling students with IEPs first, it is much easier to plan inclusive instruction, including co-teaching, and provide accommodations and interventions that students with IEPs need. Without a purposeful scheduling design, the outcomes are less coordinated and effective.

   d. **Ensure Access to Relevant and Challenging Courses.**

      1) **Advanced Placement/World Language Classes.** Consider how course participation rates for students with IEPs may increase either immediately or in the future at the high school. Review impediments for students with IEPs to these courses and with a stakeholder group develop strategies to lessen the impediments, to increase enrollment, and to support teaching and learning of students with IEPs.

      2) **French Immersion Program.** While the district policy is that any interested student can participate in the French Immersion program, students with IEPs do not choose to enroll at the same rates as their non-disabled peers. Review practices that may reduce the perception of access for students with IEPs, the extent to which service delivery can be modified to facilitate greater access, and instruction can be differentiated and accommodations provided to address the needs of accepted students.

5. **INCLUSION MODEL.** Strengthen the inclusion model of co-teaching across the district to ensure student access to rigorous Common Core standards. Develop a multi-year plan to build on current strengths to expand this program. Without appropriate training, resources, and administrative supports, the quality of and effectiveness of co-teaching classroom practices are unrealized.70 This point can be stated in other terms: When a district sees the benefits and invests its financial resources to place two highly skilled teachers with a distinct set of skills in the same classroom to address the needs of all students and the teachers are not prepared or supported to do so, nothing will change for students. Without support, teachers typically fall into the roles of “teacher” (general educator) and “aide” (special educator). These recommendations will lead to more successful implementation.

   a. **Develop written guidelines.** Create written guidelines that provide clear expectations and directions to all and provide an institutionalized record to which all staff, including new teachers, and parents can refer. Guidelines should include, at a minimum: student entry criteria, program description and roles/responsibilities for co-teaching pairs.

   b. **Consider program expansion.** Review student numbers at all grade levels to determine potential opportunities for expansion. Consider expanded co-taught courses to Chemistry and US History at the high school. Consider adding co-teaching to Cunningham and adding additional courses, at a minimum,

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69 Collaborative Consultation: [https://sites.google.com/site/inclusionsecondaryclassroom/collaborative-consultation](https://sites.google.com/site/inclusionsecondaryclassroom/collaborative-consultation)

Collaborative Consultation: [https://sites.google.com/site/inclusionsecondaryclassroom/collaborative-consultation](https://sites.google.com/site/inclusionsecondaryclassroom/collaborative-consultation)

at Glover. Prior to hiring additional staff, see if existing special educators can be reallocated to teach these classes.

c. **Full day co-teaching.** Commit to dedicated team teaching pairs at the elementary level. Extend co-teaching to a full day in all 4th and 5th grade classes for next year. Additional staff will need to be hired to support this change.

d. **French Immersion program.** Evaluate the feasibility of creating French co-taught strands to increase access to that program. If feasible the introduction of this strand would be best done in one pilot elementary school and beginning in the first grade with additional grades added each year. PCG recommends waiting at least until the 2017-18 school year if this model is adopted to allow for appropriate planning.

e. **High school course scheduling for co-teaching.** Ensure there is a more appropriate distribution of students with and without IEPs to promote academic rigor in high school team taught courses. Aim to reconfigure course schedules so that no more than 40% of students have an IEP in a co-taught class. This shift will require additional coordination and collaboration between departments.

f. **Provide consistent, on-going professional development.** Professional development serves as the basis for creating common understanding and shared experiences among all staff and provides a foundation upon which other systems change supports can be anchored. Develop a professional development plan specific to co-teaching and ensure it is embedded in the larger district-wide training plan. Create multiple avenues for this training, including more traditional workshops and also job embedded coaching (i.e., observing and providing feedback to peers as they are conducting co-teaching lessons). Coaching practice and feedback refines practices and guides educators to a deeper understanding.

g. **Develop supportive structures that allow effective co-teaching teams to create efficiency and build investment.** When co-teaching teams have spent time to develop effective communication, have established a cohesive working partnership, and are seeing positive results in student achievement, administrators must seriously consider the investment in time and effort that it takes to create an effective partnership and seek ways to maintain these teams. Develop a plan to enable successful co-teaching teams, whenever possible, to remain together from year to year. Conduct a review of co-teaching teams annually to ascertain the success of the partnership and make changes to staffing pairs when needed. Communicate staffing changes early.

h. **Common co-teaching planning time.** Experts in co-teaching suggest that to be effective, teams should invest regularly scheduled time to co-planning, whether within a provided planning block or on their own. Equally important as the actual time spent co-planning is teachers’ preparation to plan, how they use their time, and how they use unstructured planning methods to augment their formal planning time. Provide guidance on when, where, and how often, at a minimum, co-teaching teams should collaborate. While these structures appear to exist at the elementary school, ensure there is similar dedicated co-planning time at the middle and high schools.

i. **Guidance.** Develop a MPS specific ‘Guide for Inclusive Education’ and other evidence-based practices to support these outcomes. Make this information available in one electronic, web-based document that addresses:

- All disability areas with respect to the continuum of characteristics and needs of students with IEPs, including those for students with IEPs who are ELLs;
- Universal Design for Learning, differentiated instruction, and access to the MA Curriculum Frameworks within an MTSS framework;
- Flexible grouping in and outside of regular classrooms;
- Inclusive instructional models, such as co-teaching, collaborative consultation, etc.;

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• Opportunity for students in special programs to interact with nondisabled peers to the maximum extent appropriate, and strategies for maximizing appropriate interactions;

• Identify which students are best served in a fully included environment and which students are best educated in specialized programs;

• Enhancing student engagement through interactive teaching;

• Effective development and use of functional behavior assessments and behavior intervention plans;

• Appropriate use of paraprofessionals and assistants in an inclusive setting;

• Problem-solving and use of data for decision-making;

• Transition support for students attending another school the following school year; and

• Guidelines for educating students outside of general education classes, regular schools, and the District.

6. COMPLIANCE. Review district practices to ensure timelines and meeting dates are met.

   a. **Electronic System.** To the extent feasible, move all recordkeeping to a centralized electronic format to allow for more streamlined communication and prevent missed timelines and meeting dates.

   b. **Reports.** Develop and maintain reports that monitor status of key timelines. Share reports monthly with all principals. Regularly review these reports at senior leadership meetings.

   c. **Expectations.** Set expectations that special education compliance is a non-negotiable. Ensure checks are in place for all 56 metrics monitored by the state and aim to have no findings on the District’s next state audit.

7. IEP QUALITY. Strengthen IEP writing to ensure better understanding of IEP intent by both staff and parents.

   a. **Professional Development.** Provide training to strengthen IEP writing. Focus on goal development, and how to create concise, meaningful, measureable and appropriate goals that support student growth.

   b. **Quality Control.** Devise a system to read, review and comment on all IEPs until quality is deemed appropriate.

8. VERTICAL TRANSITIONS. Develop a district-wide plan with input from key stakeholders to create consistent practices that support successful vertical transitions for students with IEPs. Seek ways to ensure that students’ transitions between each school year and teacher are facilitated to support appropriate and successful classroom learning experiences.

   a. **Standardization.** Developing a district-wide process for transition planning and implementation will pave the way for better outcomes. The plan should address the transition process, timelines, and schedules for successful implementation, participants and their roles, and internal and parent communication. Consideration should be given to how teams can be supported with time or other resources to meet the charge of creating a successful vertical transition program that supports classroom instruction.

   b. **Written protocols.** Review and revise as necessary any written standards regarding the transitioning of students from one grade level to another, including the manner in which IEPs are to be developed collaboratively by staff from the two schools. Communicate the standards and have coordinators monitor their effectiveness and usage.
9. **ADDITIONAL STAFF.** Augment current staff positions to better support the programmatic and school-based responsibilities of the Pupil Personnel Services office. Current central office staff is thin compared to many other like districts. Given that the recommendations in this report are far reaching, MPS should consider augmenting current staff positions to carry out this work. The following is a list of positions that MPS should consider adding as part of its mission to improve the academic achievement of students with disabilities:

- **Multi-Tiered Systems of Support (MTSS) (0.5 FTE).** This position should be housed in the Curriculum Department (not the Pupil Personnel Services Office) and drive the District’s expansion of general education intervention services to support struggling students. This role may be added to the job description of an existing staff member, but it will need to become a focused part of their job duties.

- **Coordinator for Data, Compliance, and eSped (1.0 FTE).** The intent of this position to strengthen the department’s internal operations and develop structures to streamline data collection and reporting for state and federal reporting measures, improve usage of the special education IEP system, and ensure the District is compliant with all state and federal technical advisories. Further, adding this position will allow the Pupil Personnel Services Director to spend time focused on instructional support. PCG considers this position critical to the Department’s success.

- **French-Speaking Psychologist (>0.5 FTE).** This position can be filled by a contractor on an as needed basis and is needed in order to fully support students struggling with reading in the French Immersion program.

- **Special Education Parent Ombudsman (0.5 FTE).** This position will act as a liaison between the Director of Pupil Personnel Services, the District’s Parent Ombudsman, and the Special Education Parent Advisory Committee, and serve as a voice for parents of children with special needs. He/she can also provide training, disseminate communication and create a resource library for parents. These responsibilities may be adopted, at least initially, by the district’s Parent Liaison but will require targeted professional development to support their understanding of special education.

- **Clinical supervisor for adjustment counselors and psychologists (1.0 FTE).** This position will coordinate specific training for these personnel groups, offer professional guidance for all staff, and help the District expand its social/emotional wellness curriculum. This position may be divided as a 0.5 clinical supervisor and a 0.5 adjustment counselor.

- **Middle school Language-Based Teacher (1.0 FTE).** The position will support the reading needs of middle school students. The role should be modeled to emulate the success of the district’s high school language-based program.

- **Co-teachers.** At least 2.0 FTE additional special educators to support the expansion of full day co-teaching in 4th and 5th grade. If the district expands co-teaching to other grades or courses, additional staff may be required. If the district expands co-teaching into the French Immersion program, an additional French-speaking special educator would need to be hired.

10. **PERSONNEL RATIOS/CASELOADS & SUPPORT.** Based on all available data, including a review of personnel ratios and caseload data included in the PCG study, reallocate or add resources to ensure that MPS expectations regarding the provision of SDI/related services are reasonably capable of being met.

   a. **Overall Special Educator & Paraprofessional Aides/Assistant Ratios.** Data showing the very small per student ratio for paraprofessional aide/assistant (average of 10.6 students each) and the larger ratio for special educators (average of 11.7 students with IEPs each). Consider how these ratios could change to smaller special educator to student and larger paraprofessional aide/assistant to student ratios in a cost neutral way. In this way, more educators would be available to provide instruction to students with IEPs, support the expansion of the co-teaching model, and address teacher retention and many of the
recommendations in this report. As part of this process, communicate with parents and schools regarding any ratio changes and the advantages associated with more reliance on special educators than assistants.

b. **Related Services.** With representatives of related services personnel and schools, discuss the issue of scheduling related services, the extent to which they are provided in/out of general education classes, and the relative values of and best-practice circumstances for each approach. Based on these discussions, establish written expectations regarding scheduling and effective models and expectations around consistent progress monitoring.

c. **Staffing Allocations/Assignments.** Develop protocols for reviewing and managing caseloads and staff assignments on a regular basis. Conduct an in-depth analysis of caseloads and document how and when decisions are made to review the caseload distribution. Reviews should occur at least quarterly. Analyze the current assignments of co-teaching pairs. Determine if and how often teaching pairs should be rotated and assignments made so that special educators are not assigned to co-teach with more than two general education teachers.

d. **Job Descriptions.** Create a job description for the inclusion specialist and ensure all other positions that accurately reflect the type of work they are expected to do.

e. **Additional Positions.** In order to increase the achievement for students with disabilities, consider adding the positions recommended in this report.

11. **TECHNOLOGY USE.** Ensure the District’s recently hired Digital Education Coordinator provides training and coordination for special educators as well as general education teachers.

12. **ASSISTIVE TECHNOLOGY.** Maximize access of students with IEPs to assistive technology. Review and revise, as appropriate, MPS’s assistive technology criteria and procedures, including standards for lost devices. Along with the special education administrators, have principals/designees help to disseminate the procedures widely and ensure their appropriate use by school-based personnel. More students with IEPs can access Common Core state standards-based curriculum when provided instruction through a universal design for learning and related assistive technology. Consider the benefits and fiscal costs of having the more common assistive technology devices available at every school with upfront training, to maximize access and to enable assistive/technology personnel more time to evaluate and support students with a need for more sophisticated devices.

13. **PROFESSIONAL LEARNING.** Based on all of the areas in these recommendations that require professional learning for effective implementation, plan a differentiated professional learning program for all affected educators, paraprofessionals, assistants, etc. Infuse learning opportunities that are ongoing and job-embedded, including new teacher induction and leadership development. As part of this planning process consider the following provisions.

a. **National Standards.** Have the professional learning activities be consistent with national Learning First standards.72

b. **Toolkits.** Through a web-based instructional toolkit, include: all aspects of MTSS, including models/examples for the master schedules to support implementation; inclusive education, and evidence-based specially designed instruction; collaboration and co-planning; progress monitoring; research showing the benefits of inclusive instruction; etc. Include in the toolkits videos, webinars, and facilitate WebEx

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72 National Staff Development Council, *Designing Powerful Professional Development For Teachers and Principals*, Dennis Sparks at www.learningforward.org/news/sparksbook/sparksbook.pdf. The document at pages 1-2 to 1-4 links a variety of national research-based reports summarizing the importance of professional development for teachers and parents.
meetings to maximize communication and collaboration.

c. **Cross-Functional Training.** Initiate cross-function training of administrators and other school support groups from every educational division to expand their knowledge and ability to support school-based personnel.

d. **Mandated Training.** Consider mandating training and other approaches if necessary to ensure that staff members needing professional development receive it for specific purposes.

e. **Differentiated Training Opportunities.** Offer professional learning in a differentiated and targeted manner for all types of personnel (e.g., paraprofessionals, adjustment counselors, special education teachers, etc.), and determine how the training will be offered to enable the all staff to attend.

f. **Best Practices.** Establish ways for school personnel to share across schools and with other school districts their successful practices and to problem-solve solutions, including the identification of schools of excellence, use of exemplary school-based personnel to include as trainers, informal common time for guided discussion, and communication via Wiki.

g. **Parent Involvement.** With parent stakeholder and representative groups, consider how training will be made available for families/caregivers to reinforce activities that will support the learning, social/emotional skills, and positive behavior of their children.

h. **Communication & Feedback.** Establish timely communication/feedback processes to share solutions to implementation barriers. Several problem areas are likely to require targeted groups of knowledgeable people to resolve issues as they arise. For example, schools often have difficulty providing services with existing staff and would benefit from feedback from individuals able to analyze the situation and give meaningful suggestions for instruction and use of staff.

14. **ADVANCEMENT BUDGET.** To the extent possible, create a budget line item that continues the Advancement Budget initiatives and focuses additional resources in special education.

15. **PARENT AND FAMILY ENGAGEMENT.** Enhance communication with parents/families by improving the MPS/Special Education websites and resolving disputes.

   a. **Websites.** Use MPS’ website as a mechanism for keeping stakeholders aware of District activities relevant to the PCG recommendations and implementation status, as well as other enhancements and changes for special education.

   b. **Facilitated IEP Process.** Initiate the neutral-party facilitated IEP process for complex meetings (and upon request). This process has been extremely effective for enabling participants to engage in positive communication, reducing conflict, and focusing meetings on the needs of children.\(^{73}\)

16. **SPECIAL EDUCATION MANUAL.** Create an MPS special education manual to support current and user-friendly access to procedures/practices relevant to the management/operation of special education.

   a. **Public Access.** Provide public access to the manual by posting the document on the MPS special education webpage, and provide links to available online resources. Ensure staff is available to update the manual regularly with current information and resources.

   b. **Content.** Include criteria, procedures and practices for each area relevant to the implementation of

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these recommendations, e.g., criteria for child find; referring students for a special education evaluation; inclusive instruction for preschool children; instruction for ELLs with IEPs; use of MTSS and state/local criteria for determining eligibility for Specially Designed Instruction (SDI) and advantages of early identification and support; support for on-going needs of preschool children and school-aged students who are referred but are not evaluated or not qualified for services; expectations and tools to facilitate communication to teachers regarding the IEP-specified needs of students in each of their classes; participation of general education teachers in IEP meetings; role of various IEP participants and general/special education personnel in various circumstances; etc.

c. **Collaboration with Stakeholders.** Collaborate with preschool personnel, principals, other school-based groups, and SEPAC representatives to consider information and resource links that would be useful for each relevant group to include in the manual.

d. **Parents/Families.** In collaboration with the SEPAC, plan face-to-face training and online modules to provide parents an understanding of the information in the manual. If feasible, publish a modified document appropriate for parents and supplement it with one-page brochures for further access to this information. Ensure training is accessible to parents with diverse linguistic needs and sensory limitations.

**17. DATA AND SYSTEMS. Ensure decision-makers have access to quality data.** More effectively use electronic systems to support and streamline data collection and maintenance.

a. **Data Quality.** Develop systems and processes that allow for consistent, timely and accurate reporting of program data (such as referral and eligibility data). Data should be maintained in a format that allows for easy manipulation and analysis.

b. **System/process review.** Work with the special education management system vendor to complete a system/process crosswalk to ensure the District is currently using the tool to its full capacity. Consider hiring an outside group to analyze the District’s use of systems and provide recommendations to improve data quality and reporting capability.

c. **Data Integration.** Work with the special education management system and Student Information System vendors to investigate the electronic transfer of data (and eliminate all duplicative data entry by hand) between systems.

d. **Reporting.** Use the special education data management system to develop reports to monitor compliance and manage programs. Ensure District staff have necessary training and skillsets to manage reporting needs.

e. **Training.** Consider expanding users with access to the special education management system and provide trainings as needed. Ensure all new staff receive dedicated training of the District’s special education data management system.
APPENDICES

Appendix A. PCG Security and Confidentiality Policy for Protected Data

Public Consulting Group (PCG) is committed to ensuring the security and confidentiality of data that is entrusted to it by its clients and others, including “protected health information” under the Health Insurance Portability and Accountability Act (“HIPAA”), “education records” under the Family Educational Rights and Privacy Act (“FERPA”), and other data that is confidential under other applicable laws, regulations, contracts, or ethical standards (collectively, “Protected Data”).

This policy codifies PCG practices and procedures relating to the security and confidentiality of Protected Data. All PCG employees are expected to read, understand, and comply with this policy. For purposes of this policy, the term “security” relates to external threats to Protected Data, such as fire and theft. The term “confidentiality” relates to improper use and disclosure of Protected Data.

Questions regarding this policy may be directed to the appropriate manager or to PCG Legal Counsel.

A. BASIC PRINCIPLES

1. PCG will maintain and use appropriate administrative, physical, and technical safeguards to reasonably protect the security, integrity, and confidentiality of Protected Data.
2. PCG will not disclose Protected Data to any employee, contractor, or other person unless that person has executed an appropriate agreement relating to the security and confidentiality of the Protected Data.
3. PCG will not use or disclose the Protected Data except as authorized in writing by the source of the Protected Data.
4. PCG will immediately investigate any reported breach of its security and confidentiality safeguards. If a breach is confirmed, PCG will notify the source of the Protected Data, and will take appropriate steps to correct the problem and to mitigate any harm.

B. SECURITY SYSTEMS

1. PCG utilizes physical and electronic systems to secure Protected Data. Physical systems include building access controls. Electronic systems include computer passwords, firewalls, virus detection software, and encryption. Employees are prohibited from bypassing these systems.
2. The Director of Information Technology Services maintains detailed procedures for PCG electronic security systems, including how the HIPAA Security Rule is addressed, and is responsible for electronic security awareness and training.

C. PROJECT REQUIREMENTS

For each project that involves the use of Protected Data, the Project Manager is responsible for ensuring and documenting compliance with: (a) the security and confidentiality requirements that are contained in the contracts under which Protected Data is made available to PCG for the project; and (b) this policy.

1. Project documents. For each project that involves the use of Protected Data, required project documents include the following: (a) this policy; (b) a HIPAA “business associate” agreement or other written agreement with each source of Protected Data, pertaining to the use and disclosure of that Protected Data; (c) agreements with any project contractors and other non-PCG individuals or entities relating to the use or disclosure of MPS Protected Data that they did not provide; and (d) the Protected Data itself.
2. Security of Electronic Protected Data. The Project Manager will consult as necessary with the Director of Information Technology Services with respect to the security of Protected Data that is held or used in electronic form. This includes encryption, the availability of secure data storage facilities, the use of computers and laptops, and the disposition of Protected Data at the end of a project (pursuant to the Project Record Retention Plan).

3. Security of Non-Electronic Protected Data. The Project Manager will consult as necessary with the appropriate office manager and Practice Area Director with respect to the security of Protected Data that is held or used in non-electronic form. This includes ensuring the availability of secure data storage facilities, and the disposition of the Protected Data after the expiration of the contract (pursuant to the Project Record Retention Plan).

4. Use of Protected Data. Protected Data may be used only for the specific purpose(s) for which it was made available to PCG, as documented in a HIPAA Business Associate Agreement or other written agreement with the entity that made the data available, or as may be required by law. To the extent that Protected Data is used or disclosed “as required by law,” rather than pursuant to the documented agreement with the source of the Protected Data, that use or disclosure will be documented in the project file.

5. Access to Protected Data. Access within PCG to Protected Data is limited to PCG employees and contractors who require such access for purposes of a project for which the Protected Data was provided. Protected Data must not be discussed or made accessible outside a secure environment.

6. Transmission of Protected Data. Protected Data may be transmitted only in a way that protects its security and confidentiality. For non-electronic data, this includes the use of a delivery service that allows packages to be tracked. For electronic data, this includes encryption.

D. TRAINING

1. Training. PCG will make available to its employees appropriate training relating to the security and confidentiality of Protected Data. To the extent appropriate, the training will focus on new developments and use actual scenarios. All PCG employees are required to complete such training.

2. Temporary employees. Training requirements apply as well to temporary employees who may have access to Protected Data.

3. Subcontractors and contractors. Training requirements may apply as well to subcontractors and other PCG contractors, depending on the nature of their work.

E. PERSONNEL RESPONSIBILITIES

All PCG employees have responsibilities relating to this policy.

1. Every PCG employee is responsible for understanding the policy, complying with the policy, and reporting violations of the policy to an appropriate supervisor or to PCG Legal Counsel. Every PCG employee is required to read and acknowledge this policy before having access to Protected Data, and to sign an acknowledgement form. The executed acknowledgement form will be kept in the employee’s personnel file.

2. Project Managers are responsible for ensuring compliance with the policy on the project, including by any temporary employees and contractors. In the event of a breach of security or confidentiality, the Project Manager is responsible for notifying PCG Legal Counsel and for taking the steps recommended by Legal Counsel to notify the source of the Protected Data, to correct the problem, and to mitigate any harm.

3. PCG Legal Counsel is responsible for implementing and maintaining the compliance program, for addressing reports of violations, and for reporting directly to senior management on the reported violations and other aspects of the compliance program. Legal Counsel also will answer employee questions regarding compliance or ethics issues. Temporary employees, subcontractors, and other contractors also are subject to this policy, except as indicated under Section C (Training).

F. REPORTS OF VIOLATIONS
1. Reports. Employees are to report violations of the policy to their supervisors, who will promptly notify PCG Legal Counsel, or directly to PCG Legal Counsel.
2. Confidentiality. Reports to Legal Counsel may be made on a confidential basis by calling the PCG Compliance Hotline, at x1129.
3. Response. Legal Counsel will log each report of non-compliance, will address each report, and periodically will report to senior management on each violation and its disposition.
4. Retaliation. Employees making a good faith report of non-compliance will not be retaliated against on account of the report.
5. Documentation. Reports of violations relating to a project will be documented in writing, and will be included in the project file as a project document along with documentation of the corrective actions taken, with an appropriate level of documentation also sent to the Director of Human Resources.

G. EVALUATIONS

1. Adherence to this policy, including the fulfillment of training requirements and the timely reporting and proper handling of violations, will be elements of employee performance evaluations.
2. The exit interview for employees leaving PCG will ask whether the employee was aware of any violations of this policy, and any reports will be investigated by Legal Counsel.

H. MONITORING

Legal Counsel and the Director of Quality Assurance will monitor the operation of this policy, and will recommend and implement any necessary modifications.

I. DOCUMENTATION

PCG will keep appropriate documentation relating to this policy. Documentation includes the project documentation required in Section C, the acknowledgments referenced in Section D, and the reports of violations and corrective actions referenced in Section F.

FERPA COMPLIANCE POLICY

In the course of providing contract services to education agencies, PCG gains access to confidential student information as necessary to perform the contracted services. PCG is committed to ensuring the security and confidentiality of the student information it receives, specifically, information contained in “education records” that must be protected from improper disclosure under the Family Educational Rights and Privacy Act (“FERPA”). PCG’s commitment to protect the confidentiality of student information is memorialized in this FERPA Compliance Policy. All PCG employees and subcontractors with access to confidential student information are expected to read, understand, and comply with the FERPA Compliance Policy.

Questions regarding this Policy may be directed to the appropriate manager, Compliance Counsel for the Education Services Practice Area (ESPA), or to PCG’s Corporate Counsel. Individuals are also encouraged to review the FERPA federal regulations codified at 34 CFR Part 99.

A. DEFINITIONS FOR PURPOSES OF THIS POLICY

1. “Disclosure” or “disclose” means to permit access to or the release, transfer, or other communication of personally identifiable information contained in education records by any means, including oral, written, or electronic means, to any party except the party identified as the party that provided or created the record.
2. “Education records” means, with specified exceptions, those records that are (1) directly related to a student; and (2) maintained by an educational agency or institution or by a party acting for the agency or institution.

3. “Improper disclosure” means the use or disclosure of personally identifiable student information for any purpose not authorized by the client that provided PCG with the information.

4. “Personally identifiable information” or “confidential information” means
   - the student’s name,
   - the name of the student’s parent or other family member,
   - the address of the student or student’s family,
   - a personal identifier, such as the student’s social security number or student number,
   - a list of personal characteristics that would make the student’s identity easily traceable, or
   - any other information that would make the student’s identity easily traceable.

B. PCG’S FERPA COMPLIANCE STANDARDS

PCG maintains and uses appropriate administrative, physical, and technical security systems to reasonably protect personally identifiable student information from improper disclosure.

PCG does not allow access to personally identifiable student information to any employee or subcontractor unless that individual has reviewed and signed the Acknowledgment of the PCG FERPA Compliance Policy, which contains the individual’s agreement to protect student information from improper disclosure. (Note: Execution of the Acknowledgment of Security and Confidentiality Policy for Protected Data form satisfies the signature requirement.)

PCG uses or discloses personally identifiable student information only as authorized by the client that provides PCG with access to the information as permitted by FERPA regulations.

PCG will immediately investigate any reported breach of its security and confidentiality safeguards. If a breach is confirmed, PCG will notify the LEA or SEA source of the student information, and will take appropriate steps to correct the problem and to mitigate any harm.

C. SECURITY SYSTEMS

1. PCG utilizes physical and electronic systems to secure student information. Physical systems include building access controls. Electronic systems include computer passwords, firewalls, virus detection software, and encryption. Employees are prohibited from bypassing these systems.

2. The Director of Information Technology Services maintains detailed procedures for PCG electronic security systems, including how the Health Insurance Portability and Accountability Act (HIPAA) Security Rule is addressed, and is responsible for electronic security awareness and training.

D. PROJECT REQUIREMENTS

1. For each project that involves the use of personally identifiable student information, the Project Manager is responsible for ensuring and documenting compliance with: (a) the security and confidentiality requirements that are contained in the contracts under which personally identifiable student information is made available to PCG for the project; and (b) this Policy.

2. For each project that involves the use of personally identifiable student information, required project documents include the following: (a) this Policy; (b) agreements with any project subcontractors relating to the use or disclosure of personally identifiable student information; and (c) each employee’s and subcontractor’s signed Acknowledgment of the PCG FERPA Compliance Policy.

3. The Project Manager will consult, as necessary, with the Director of Information Technology Services with respect to the security of personally identifiable student information that is held or used in electronic form.
This includes encryption, the availability of secure data storage facilities, the use of computers and laptops, and the disposition of personally identifiable student information at the end of a project.

4. The Project Manager will consult, as necessary, with the appropriate office manager and Practice Area Director with respect to the security of personally identifiable student information that is held or used in non-electronic form. This includes ensuring the availability of secure data storage facilities and the disposition of the personally identifiable student information after the expiration of the contract.

5. Personally identifiable student information may be used only for the specific purpose(s) for which it was made available to PCG, as documented in a written agreement with the entity that made the information available or as otherwise authorized in writing by that entity. The agreement is maintained by the Project Manager.

6. Access within PCG to personally identifiable student information is limited to PCG employees and subcontractors who require such access for purposes of the project for which the personally identifiable student information was provided. Personally identifiable student information must not be discussed or made accessible outside of a secure environment.

7. Personally identifiable student information may be transmitted only in a way that protects its security and confidentiality. For non-electronic data, this includes the use of a delivery service that allows packages to be tracked. For electronic data, this includes encryption.

E. FERPA COMPLIANCE TRAINING

PCG will make available to its permanent and temporary employees, as well as subcontractors, training relating to FERPA compliance. To the extent appropriate, the training will focus on new developments and use actual scenarios. All PCG employees and subcontractors are required to complete such training.

F. PERSONNEL RESPONSIBILITIES

1. Every PCG employee and subcontractor is responsible for understanding the FERPA Compliance Policy, complying with the Policy, and reporting suspected violations of the Policy to an appropriate supervisor or to PCG Legal Counsel. Every PCG employee and subcontractor is required to read the Policy before having access to personally identifiable student information, and to sign the Acknowledgment of the PCG Compliance Policy. The employee’s executed Acknowledgment will be verified by the Project Manager or the individual’s immediate supervisor and kept in the employee’s personnel file maintained by the Human Resources Department. The subcontractor’s executed Acknowledgment will be verified by the Project Manager.

2. Project Managers are responsible for ensuring compliance with the Policy on the project, including temporary employees and contractors. In the event of a breach of security or confidentiality, the Project Manager is responsible for notifying the ESPA Compliance Counsel and for taking the steps recommended by Counsel to notify the source of the personally identifiable student information, to correct the problem, and to mitigate any harm.

3. The ESPA Compliance Counsel is responsible for implementing and maintaining the compliance program, for addressing reports of violations, and for reporting directly to senior management on the reported violations and other aspects of the compliance program. Counsel will answer employee questions regarding compliance or ethics issues. Temporary employees, subcontractors, and other contractors also are subject to this Policy, except as indicated under Section C (Training).

G. REPORTS OF VIOLATIONS

1. Employees shall report suspected violations of the Policy to their supervisors, who will promptly notify PCG Legal Counsel, or directly to PCG Legal Counsel.

2. Reports to Legal Counsel may be made on a confidential basis by calling the PCG Compliance Hotline, at 617-426-2026 x1129.
3. Legal Counsel will log each report of non-compliance, will address each report, and periodically will report to senior management on each violation and its disposition.

4. Employees making a good faith report of non-compliance will not be retaliated against on account of the report.

5. Reports of violations relating to a project will be documented in writing, and will be included in the project file as a project document along with documentation of the corrective actions taken, with an appropriate level of documentation also sent to the Director of Human Resources.

H. EVALUATIONS

1. Adherence to this Policy, including the fulfillment of training requirements and the timely reporting and proper handling of violations will be elements of employee performance evaluations.

2. The exit interview for employees leaving PCG will ask whether the employee was aware of any violations of this Policy, and any reports will be investigated by ESPA Compliance Counsel.

I. MONITORING

ESPA Compliance Counsel, in conjunction with PCG’s Corporate Legal Counsel, will monitor the operation of this Policy, and will recommend and implement any necessary modifications.
Appendix B. District Data Reviewed

PCG reviewed and analyzed a plethora of data using MPS’s Student Information System. Data with a strikethrough was not available for analysis.

DATA

1. For all enrolled MPS students (with & without IEPs), the number of:
   a. All students (total enrollment)
   b. Students by race/ethnicity (matching subgroups given in 2 below for students with IEPs)
   c. Students by grade level (early childhood, elementary, middle school & high school)
   d. Students who are English language learners
   e. Students who are eligible for Free and Reduced Lunch

2. The number of all MPS students w/IEPs & by disability area: learning disability (LD), speech/language (S/L), developmental delay (DD), other health impairment (OHI), autism, emotional disability (ED), intellectual disability (ID) and other.
   a. Same as 2 by race/ethnicity (matching subgroups given in 1 above)
   b. Same as 2 by grade level
   c. Same as 2 for students who are English language learners
   d. Same as 2 for students who are eligible for Free and Reduced Lunch

3. Number of total enrolled students & students w/IEPs by school (sorted by elementary, middle & high)

4. For students referred for an initial special education evaluation (for ‘12-13, ‘13-14 and ‘14-15 school years if possible)
   a. Total number of students referred
   b. Of students referred, number with completed evaluations by grade level
   c. Of number completed, number found eligible for an evaluation by grade level
   d. Of those found eligible, the number of eligible students by disability area & by grade level

5. Performance. Percentage of students with/without IEPs meeting/exceeding proficient standard in reading and math performance for the last school year. Include the AYP target for last school year and this year. If possible, provide this information for elementary, middle and 10th grade. Provide data for the last 5 years if easily accessible; if not, provide for the years available.

6. Graduation. Number of students with/without IEPs who graduated with a regular diploma. If available, number by race/ethnicity for each group & by disability area.

7. Dropout. Number of students with/without IEPs who have dropped out of school. If available, number by race/ethnicity for each group & by disability area.

8. Suspensions/Dismissals/Expulsions. For students with/without IEPs, number suspended by total school days last school year & by grade level.
   a. 1 to 5
   b. 6 to 10
   c. 11-15 days
   d. 16-20 days
   e. 21-25 days, etc. until all included
   f. For 8a-e by race/ethnicity if possible

9. Educational Settings (least restrictive environment). Using the federal educational setting criteria, e.g., students w/IEPs in general education setting 80% or more of the time, between 40-80% of the time, less than 40% of the time, special schools (public & private), provide the numbers:
   a. For all students with IEPs & by the 9 disability areas described in Question 2 above.
   b. If feasible:
      i. Same as 9.a. by grade level
      ii. Same as 9.a. by race/ethnicity
      iii. Same as 9.a. by ELL status (grade level is not necessary)
iv. Same as 9.a. by eligible for **Free and Reduced Lunch**

10. **Special Programs.** For example, program for students with autism
    a. For all students in special programs, the number by grade level & school
    b. Number of special program classes by grade level & school

11. **504 Plans.** Students in MPS currently on 504 plans.
    a. Number and Percent of students by grade level
    b. Number and Percent of students by school
    c. Number and Percent of students by race/ethnicity

12. **Advanced Classes.** Provide the number of students at MPS (with and without IEPs) by each advanced class, e.g., honors English, AP Math, etc.

13. **Career and Technical Education.** Provide the number of students at MPS (with and without IEPs) enrolled in career and technical education classes. Provide data for each class.

14. **Staffing.** Number of FTE staff (including contractual) in the following areas:
    a. Special education teacher
    b. Paraprofessional + assistants for students with IEPs
    c. Psychologists
    d. Social Workers
    e. Nurses
    f. Occupational Therapists
    g. Physical Therapists

15. **Data reports.** Provide copies of any regular data reports or documents currently available for special education administrators and local school administrators to help them manage and coordinate services, monitor performance, and ensure compliance for students with disabilities; and for students who are struggling academically and behaviorally.

**GENERAL INFORMATION**

For the following categories please provide documentation wherever possible

16. **Student Performance.** Provide copies of any plans implemented to improve student performance for students with IEPs.

17. **RtI/PBS/MTSS.** Provide any district documentation related to implementation of response to intervention, positive behavior supports or multi-tiered system of supports.

18. **Case Management.** Provide any written documentation related to school-based roles and responsibilities for overseeing/implementing special education and case management for assessments and IEP meetings, including titles or description of individuals responsible.

19. **Curriculum & Instruction**
    a. **Interventions.** Provide a list of research/evidence based interventions in place for reading and math for general education students achieving below grade level standards & for students with IEPs. For each, indicate the grade levels/school(s) at which they are available.
    b. **Inclusion and Co-Teaching.** Please provide any data, documents, policies, and/or procedures around the use of inclusion practices and co-teaching at MPS.

20. **Referrals.** Documentation that describes any initiatives taken during the past several years that relates to ensuring the appropriate referral of students for a special education evaluation and the responsibility of school principals and other school-based staff for overseeing this process.
    a. **Child Find.** Please provide any documentation or a description of the Child Find process as it currently exists in MPS.

21. **Configuration of Special Education Services.** Documentation that describes:
    a. District practices regarding the use of **differentiated instruction and other support** for students with IEPs receiving education in general education classes.
    b. MPS’s use of resource services.
    c. Each of MPS’s **special programs** for students with IEPs.
d. Any initiatives taken during the past several years that relate to ensuring students are placed and provided support in the **least restrictive environment** and the responsibility of school principals and other school-based staff for overseeing this process.

e. Efforts to reduce the number of students placed in **separate school settings** and any challenges or barriers experienced in this respect.

**22. Support for Transition to Post-Secondary Activities & Education.** Documentation that describes the various supports and structures in place to support students for post-secondary transition, including community-based training on job sites, interest assessments, etc.

**23. Personnel**

a. **Assistants & Paraeducators.** Description of job qualifications for assistants and paraprofessionals, how they are assigned to classes/schools, & total cost associated with each group.

b. **Caseloads and workloads.** Describe the caseloads and workloads for various personnel groups providing support for students with IEPs.

c. **Contractual Personnel**
   i. Provide the number and related cost for various personnel groups who are employed through contractual services and the comparable cost for district personnel.

d. **Annual Staffing Plan (copy)**

**24. Professional Development (PD).** Provide number of days available for staff development and any current policies regarding mandatory nature of any PD for special education.

a. If available, share the current and previous year’s PD calendar for special education with course titles.

b. List all PD offered in the last three years related to co-teaching and inclusion. Please note any mandatory courses.

**25. Description of public/private partnerships.**

**26. State Performance Plan Indicators.** Provide a copy of:

a. The last notice from the Massachusetts Department of Elementary and Secondary Education (ESE) regarding MPS’s **state performance plan indicator outcomes**

b. MA ESE’s **IDEA compliance determination letters** for the last school year for MPS, any related communication (e.g., self-review), and any documents regarding actions MPS may have been required to take.

**27. Due Process.** For the last two years, number of due process and any additional data readily available about the case issues, cases settled, hearing decisions, compensatory services, attorney fees, etc.


**29. MPS criteria for determining student eligibility for each disability area and for related services.**

**30. Fiscal**

a. **Total budget for MPS,** showing federal, state, and local share

b. **Total budget for special education & transportation,** showing federal, state and local share.

c. Provide financial information related to **high cost areas** involving special education and related services. For out-of-district placements, describe financial arrangements and how tuition rates are established.

d. Description of **state reimbursement** for students with IEPs placed in **nonpublic facilities vs. district facilities** for MPS students, and how it has changed (along with fiscal impact).

e. Provide list and brief description of all contracted services and total amount and term for each contract.

f. Describe all grants (aside from IDEA), dollar amount, and purpose of each one.

g. Describe any contracted services currently being procured by MPS to serve students with IEPs.

**31. Sample Forms.** Sample of completed Eligibility Determination form; and samples of completed IEP forms for each grade level.

**32. Accountability.** Describe aspects of the MPS’s system of accountability for administrators and schools and ways in which it includes activities related to the performance or instruction of students with disabilities. Provide copies of any illustrative reports, etc.

**33. Organization.** Please include a copy of MPS’s organizational chart for central office, and in more detail for the academic office and the special education department.
34. **Technology.** Describe technology available to track data and/or support students with RTI plans, 504 plans and/or IEPs, including any plans in place for future initiatives. Include professional development available.

35. **Parents.** Sample communication with parents of students referred for or involved with the RTI and/or IEP process – e.g., flyers, informational brochures, webinars, etc.
Appendix C. PCG Team Members

Anna d’Entremont, a Senior Consultant based in Boston, brings over 15 years of education and management experience to this project. She has a strong background in understanding the organizational policies and practices essential to support the instructional needs of students with disabilities. She has worked with numerous districts across the county delivering special education consulting services. Prior to joining PCG Education in 2008, Anna was the Director of Operations of the Edward W. Brooke Charter School in Boston, MA. In this role, she served as co-director and the operational leader of a high-performing K-8 urban charter school. Anna also worked as a Program Officer at New Visions for Public Schools, where she managed a diverse portfolio of initiatives designed to support and develop innovation in 85 new small high schools across New York City. In this role, she led small high schools to design inclusive learning environments for their students with disabilities and ELLs, and ensured schools met district and state requirements for these populations. She has also contributed to the successful creation of three New York City charter schools, where she wrote their special education policies and procedures. Anna began her career as a bilingual kindergarten teacher for the Houston Independent School District and as an elementary school ESL teacher in the DC Public Schools. She is also a Teach for America alumna, completed graduate coursework in the Teaching of ESL at the University of St. Thomas, and received her EdM in Education Policy from Teachers College, Columbia University, in Education Policy.

Dr. Jennifer Meller, a Senior Consultant for PCG Education, has over 15 years of experience. Jennifer brings expertise at the district level in the areas of data use, fiscal policy, and operational effectiveness as applied to special education, behavioral health and school health services. She is a member of the PCG Education teams currently working on special education assessment projects across various states, technology implementation projects in New Mexico, Colorado, and Utah, and business development efforts for several states in the Western US. Jennifer also served as the project manager for the Bill & Melinda Gates Foundation on a research engagement designed to inform the Foundation’s Data Team about current educational trends and develop a strategy for future data grant portfolio investments. Prior to joining PCG Education, she was Director of Operations in the School District of Philadelphia’s Office of Specialized Instructional Services, where she focused on implementing student-focused data management systems and oversaw several multi-million dollar federal grants. This work received written commendation from the Pennsylvania Department of Education (Bureau of Special Education) and recognition from other urban school districts. Jennifer earned a MS.Ed. in Higher Education Management and an Ed.D. in Educational and Organizational Leadership, both from the University of Pennsylvania. She also has a B.A. in English from Dickinson College.

Allie Panetta is a business analyst in PCG Education’s Boston Office where she provides data analysis and research support to PCG clients including school districts and state education agencies. Most recently, Allie led the data analysis component of PCG’s special education reviews in Burlington Township, NJ and Somerville, MA. She provided research and data analysis on the review of the Massachusetts education data site, known as Profiles. The project used research-based best practices and design principles to provide recommendations on public consumption of state education data through the use of a layered data site with accessible and relevant data displays and user interfaces. In 2013, Allie worked on the strategic roadmap for the elementary schools in the Roman Catholic Archdiocese of Boston (RCAB). In this engagement, PCG analyzed the current state of education in the Archdiocese, met with individual schools, and created a vision and roadmap for future sustainability. The project culminated in a strategic roadmap for the RCAB Catholic Schools Office (CSO), a scorecard for individual schools as well as a comprehensive report analyzing the current and future outlook of the schools in the Archdiocese. Recommendations were based upon a complete battery of data collected and analyzed from the archdiocese and over 80 individual schools. Allie also manages the RTI system pilot in Cambridge Public Schools, MA and supports PCG’s strategic planning projects. She has a degree in political science and economics from the College of the Holy Cross in Worcester, MA.

Annelise Eaton, a business analyst in PCG’s Boston office, will provide project support and coordination. Annelise provides project management, data analysis, and project support for PCG Education clients. Annelise recently
provided data analysis and project coordination for the Special Education Review in Somerville, MA. Additionally, she provides all logistical coordination for the Connecticut State Department of Education’s Systems of Professional Learning, involving 210 professional development sessions, statewide launch events, and a series of webinars focused on Common Core implementation. In this capacity, Annelise oversees event management for all sessions and directs participant communication efforts. She also facilitates weekly project management calls to coordinate between project team members, facilitators, participants, and other stakeholders. Annelise previously worked at Harvard Law School, where she developed communications materials, managed the website, and provided meeting facilitation for the Public Service Venture Fund. Annelise is a graduate of Boston College, where she received a B.A. in English and a M.A. in Developmental and Educational Psychology.

Patricia Crowley, a special education subject matter expert, currently offers direct consulting services, mentoring, and support to Boston Public Schools and recently finished an engagement with Lawrence Public Schools, MA. Pat comes to PCG Education with more than 30 years’ experience as a senior administrator in special education in Boston Public Schools. In this role, she had direct accountability for assuring compliance with State and Federal Regulations as well as the Court Ordered Mandates. These responsibilities included: the designing, aligning and implementing of systems to ensure quality assurance of timelines, service delivery and a continuum of services: development and training of systemic policy and procedures: interfacing IEP goals with curriculum standards and providing ongoing operational technical support. She has also served as a guest lecturer at several universities, including Harvard, Boston University and Boston College, in special education regulations compliance and accountability.
Appendix D. Explanation of Terms

The following is a list of terms used in the report with a brief explanation of their meaning. When applicable, website addresses are provided for more information.

**Assistive Technology (AT)** includes a piece of equipment or product system that may be used by a person with a disability to perform specific tasks, improve functional capabilities, and become more independent. It can help redefine what is possible for people with a wide range of cognitive, physical, or sensory disabilities. AT can ensure that students with disabilities receive a free and appropriate public education (FAPE) by allowing access to the general education curriculum and settings, providing opportunities for active participation with same age peers, and facilitating progress toward their educational goals. In addition, AT can significantly impact independence, self-expression, self-esteem, and overall quality of life (http://www.vats.org/Default.htm).

**Common Core State Standards (CCSS)** are rigorous grade-level expectations that have been established for instruction in English language arts (ELA) and math. These standards identify the knowledge and skills students need to be successful in college and/or careers. A fundamental CCSS goal is the promotion of a culture of high expectations for all students (http://www.corestandards.org/).

**Differentiated Instruction** is tailored to the learning preferences of different learners. Learning goals are the same for all students, but the method or approach of instruction varies according to the preferences of each student or what research has found works best for students like them (http://www.ed.gov/technology/draft-netp-2010/individualized-personalized-differentiated-instruction - see also, http://www.diffcentral.com/index.html).

**Emotional/Behavioral Disability (EBD), or Emotional Disturbance (ED).** A disability that adversely affects a child’s educational performance due to any of the following characteristics: inability to learn that cannot be explained by intellectual, sensory or health factors; an inability to build or maintain satisfactory interpersonal relationships with peers and teachers; inappropriate types of behavior or feelings under normal circumstances; a general pervasive mood of unhappiness or depression; a tendency to develop physical symptoms or fears associated with personal or school problems. Schizophrenia is included under this disability (http://idea.ed.gov/explore/view/p/rootregs300A300%252E8.C).

**Early Childhood (EC).** Refers to children ages zero to eight (0-8). During this time period children experience significant brain growth which is their foundation for learning and development later in life (http://www.unesco.org/new/en/education/themes/strengthening-education-systems/early-childhood/). In the context of special education, early childhood services are offered to young children who are at risk of developmental delay or disability. In most cases early childhood services refer to interventions or services prior to a child becoming school-aged (0-5, or through PreK). With a referral, some services are available at birth (http://www.parentcenterhub.org/repository/ei-overview/).

**English Language Arts (ELA).** Defined as “the subjects (reading, spelling, literature, and composition) that aim at developing the student's comprehension and capacity for use of written and oral language” (http://www.merriam-webster.com/dictionary/language%20arts).

**English Language Learners (ELL).** Individuals learning the English language in addition to their native language (http://www.hhs.gov/ocr/civilrights/resources/specialtopics/lep/index.html).
**Individuals with Disabilities Education Act (IDEA)** provides federal funding to state and local education agencies and requirements for the provision of special education and related services to eligible school-aged students with disabilities. The law also provides funding and requirements for early intervention services for children birth through two (http://idea.ed.gov/).

**Individualized Education Program (IEP).** A written document that is developed, reviewed, and revised in a meeting based on detailed IDEA requirements. The IEP has various components including each student’s present levels of academic achievement/functional performance; measurable annual goals and benchmarks/short-term objectives; progress monitoring; services and program modifications/supports; the educational setting for services; assessment requirements; and postsecondary transition services and activities (http://nichcy.org/schoolage/iep/iepcontents).

**Intellectual Disability (ID).** Also called mental retardation, this disability means significantly sub-average intellectual functioning, existing concurrently with other deficits in adaptive behavior which manifest during the developmental period and adversely affect a child’s educational performance (http://idea.ed.gov/explore/view/p,%2Croot%2Cregs%2C300%2CA%2C300%252E8%2C).

**Least Restrictive Environment (LRE).** A core principle of Section 504 and IDEA that states to the greatest extent possible, children with disabilities are to be educated with other children who are not disabled. Separate classes, facilities, and removal of children from the general education setting only occur in cases when the nature or severity of the child’s disability prevents the student from adequately performing, even with the help of supplementary aids and services. A child whose needs can be met by modifications, and supplementary services or aids should not be removed from an age appropriate classroom. In this context, LRE refers to the amount of time a child with disabilities spends in the general education setting. Inclusion in general education more frequently, or higher percentages of time in general education are seen as a less restrictive environment. On the contrary, separate classes or schools are seen as more restrictive, as it takes students with disabilities away from their non-disabled peers (http://idea.ed.gov/explore/view/p,%2Croot,statute,I,B,612,a,5.).

**Massachusetts Comprehensive Assessment System (MCAS).** The MCAS is the state’s standardized assessment system and is administered starting in grade 3. The 10th grade assessment is part of the MA state graduation requirements. Subtests include Mathematics, English Language Arts and Science, Technology, and Engineering (http://www.doe.mass.edu/mcas/overview.html).

**Massachusetts Department of Elementary and Secondary Education (ESE).** The Massachusetts state department of education (http://www.doe.mass.edu/http://www.doe.mass.edu/).

**Multi-Tiered System of Supports (MTSS)** is a framework supports the early identification of students struggling in academic and behavioral areas so that they may be provided with systematically applied strategies and targeted instruction at varying levels of intervention. It is an educational practice designed to ensure that all students have access to effective instruction and support to achieve positive outcomes. It is designed to reduce achievement gaps for all students, including general education students, English Language Learners (ELLs), and students receiving special education services. In addition, through this process students who are excelling may be identified and provided with enriched instruction and activities (Common Core State Standards and Diverse Students: Using Multi-Tiered Systems of Support) (http://rtinetwork.org).

**National Research Council (NRC).** Part of the National Academy of Sciences and the National Academy of Engineering, the National research council’s mission is to improve government decision making and public policy.

**Occupational Therapy (OT).** Services provided by a qualified professional that contribute to improving, developing or restoring functions impaired or lost through illness, injury, or deprivation; improving ability to perform tasks for independent functioning if functions are impaired or lost; and preventing, through early intervention initial or further impairment or loss of function (http://idea.ed.gov/explore/view/p/rootregs.300.A.300%252E34).

**Office for Civil Rights (OCR)** The U.S. Department’s Office for Civil Rights has the responsibility for enforcing various civil rights laws pertaining to school districts, including Section 504 (http://www2.ed.gov/about/offices/list/ocr/index.html).

**Office of Special Education Programs (OSEP)** is the federal office that is dedicated to improving results for infants, toddlers, children and youth with disabilities ages birth through 21 by providing leadership and financial support to assist states and local districts (http://www2.ed.gov/about/offices/list/osers/cf/index.html?src=mr). (http://www2.ed.gov/about/offices/list/osers/osep/index.html?src=mr).

**Other Health Impairment (OHI).** Impairment, generally stemming from chronic or acute health conditions, that adversely affects a child’s educational performance by limiting strength, vitality, or alertness. Health problems contributing to OHI may include asthma, attention deficit disorder, epilepsy, sickle cell anemia, or Tourette syndrome (http://idea.ed.gov/explore/view/p%2Croot%2Cregs%2C300%2CA%2C300%252E8%2C).

**Physical Therapy (PT).** A related service provided by physical therapists to assist a child with a disability succeed in the educational environment by reducing pain, and improving or restoring physical mobility (http://idea.ed.gov/explore/view/p/rootregs.300.A.300%252E34,, http://www.apta.org/AboutPTs/).

**Professional Development (PD).** In education, professional development refers to a “comprehensive, sustained, and intensive approach to improving teachers’ and principals’ effectiveness in raising student achievement”. This may include any activity sponsored by the school or conducted by qualified professionals that enhances staffs’ effectiveness in the classroom by promoting job embedded training or coaching. Other PD activities to support these goals include workshops, institutes, conferences, and memberships to educational organizations or associations (http://learningforward.org/who-we-are/professional-learning-definition#.VMqiPGh4qsg).

**Related Services.** Transportation and such developmental, corrective, and other supportive services as are required to assist a child with a disability to benefit from special education, and includes speech-language pathology and audiology services, interpreting services, psychological services, physical and occupational therapy, recreation, including therapeutic recreation, early identification and assessment of disabilities in children, counseling services, including rehabilitation counseling, orientation and mobility services, and medical services for diagnostic or evaluation purposes. Related services also include school health services and school nurse services, social work services in schools, and parent counseling and training.
Response to Intervention (RtI). Rigorous implementation of RtI includes a combination of high quality, culturally and linguistically responsive instruction; assessment; and evidence-based intervention. Comprehensive RtI implementation will contribute to more meaningful identification of learning and behavioral problems, improve instructional quality, provide all students with the best opportunities to succeed in school, and assist with the identification of learning disabilities and other disabilities.

Section 504 of the Rehabilitation Act of 1973 (Section 504 or 504) is a civil rights law that prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Specially Designed Instruction (SDI) for children with disabilities is a requirement under IDEA. SDI refers to the teaching strategies and methods used by teachers to instruct students with learning disabilities and other types of learning disorders.

Specific Learning Disability (SLD). Disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written. It includes the imperfect ability to listen, think, speak, read, write, spell or to do mathematical calculations. This extends to perceptual disabilities, brain injury, minimal brain dysfunction, dyslexia, and developmental aphasia.

Speech/Language Impairment Disability (S/L). Disorder that impacts child’s ability to communicate and adversely affects academic performance, like stuttering, impaired articulation, language impairment, or voice impairment.

State Performance Plan (SPP). IDEA requires states to monitor school districts under an SPP that includes baseline data, targets and improvement activities for indicators specified by the U.S. Department of Education.

Title 1 is one section of the No Child Left Behind Act of 2001, which provides funds to school districts to improve the academic achievement of children from low-income homes. Funding is based on a minimum percentage of children from low-income families, typically the percentage of students eligible to receive free and reduced-price lunch.

Transition Services. IDEA defines "...transition services as a coordinated set of activities for a student designed within an outcome oriented process, that promotes movement from school to post school activities, including post-secondary education, vocational training, integrated employment (including adult services, independent living, or community participation)." APS coordinates implementation of transition activities for students with disabilities from preschool age to young adulthood.
Universal Design for Learning (UDL). Through a UDL approach, curriculum is initially designed with the needs of all students in mind so that methods, materials, and assessment are usable by all (www.udlcenter.org/).

Universal Screening. In the context of an RtI/MTSS prevention model, universal screening occurs for all students to help identify those who are at risk for learning difficulties (www.rtinetwork.org). United States Department of Education (USDE). An agency within the executive branch of the federal government, the USDE establishes policy, administers and coordinates most federal assistance to education. The office of Special Education Programs (OSEPS) is an office with the USDE (http://www2.ed.gov/about/landing.jhtml).
## Appendix E. MPS Staffing Ratios Compared to Other Districts

<table>
<thead>
<tr>
<th>District</th>
<th>Total Enrollment</th>
<th>% SpEd</th>
<th>Incidence</th>
<th>SpEd Educator</th>
<th>Paraeducator</th>
<th>Speech/Lang</th>
<th>Psychologist</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deer Valley Unified SD</td>
<td>36,086</td>
<td>9%</td>
<td>3,289</td>
<td>190 (18)</td>
<td>229 (15)</td>
<td>49 (68)</td>
<td>108 (31)</td>
</tr>
<tr>
<td>Cambridge Pub Schools</td>
<td>6,000</td>
<td>20%</td>
<td>1,200</td>
<td>176 (7)</td>
<td>103 (12)</td>
<td>20 (60)</td>
<td>22 (55)</td>
</tr>
<tr>
<td>Lincoln</td>
<td>1,060</td>
<td>12%</td>
<td>128</td>
<td>21 (7)</td>
<td>21 (7)</td>
<td>5 (26)</td>
<td>2 (64)</td>
</tr>
<tr>
<td>Bridgeport, CT</td>
<td>20,300</td>
<td>13%</td>
<td>2,618</td>
<td>204 (13)</td>
<td>254 (10)</td>
<td>25 (105)</td>
<td>33 (79)</td>
</tr>
<tr>
<td>Naperville IL 203</td>
<td>16,903</td>
<td>12%</td>
<td>1,978</td>
<td>150 (13)</td>
<td>237 (8)</td>
<td>33 (59)</td>
<td>22 (90)</td>
</tr>
<tr>
<td>Denver Public Schools</td>
<td>78,352</td>
<td>12%</td>
<td>9,142</td>
<td>592 (16)</td>
<td>528 (18)</td>
<td>94 (98)</td>
<td>98 (94)</td>
</tr>
<tr>
<td>Lakota Local</td>
<td>18,500</td>
<td>10%</td>
<td>1,800</td>
<td>126 (15)</td>
<td>120 (15)</td>
<td>39 (47)</td>
<td>18 (100)</td>
</tr>
<tr>
<td>Sun Prairie Area S Dist</td>
<td>6,656</td>
<td>10%</td>
<td>697</td>
<td>62 (12)</td>
<td>93 (8)</td>
<td>14 (50)</td>
<td>7 (100)</td>
</tr>
<tr>
<td>Scottsdale, AZ</td>
<td>26,544</td>
<td>11%</td>
<td>2,891</td>
<td>246 (12)</td>
<td>230 (13)</td>
<td>39 (73)</td>
<td>28 (102)</td>
</tr>
<tr>
<td>Oak Park SchDist 97</td>
<td>5,400</td>
<td>16%</td>
<td>875</td>
<td>78 (12)</td>
<td>90 (10)</td>
<td>14 (63)</td>
<td>8 (110)</td>
</tr>
<tr>
<td>Kyrene School District</td>
<td>17,910</td>
<td>9%</td>
<td>1,544</td>
<td>141 (11)</td>
<td>124 (13)</td>
<td>27 (58)</td>
<td>14 (111)</td>
</tr>
<tr>
<td>D.C. Public Schools</td>
<td>48,991</td>
<td>18%</td>
<td>8,603</td>
<td>669 (13)</td>
<td>653 (14)</td>
<td>90 (96)</td>
<td>78 (111)</td>
</tr>
<tr>
<td>Carpentersville</td>
<td>19,844</td>
<td>16%</td>
<td>3,139</td>
<td>227 (14)</td>
<td>380 (8)</td>
<td>43 (73)</td>
<td>28 (112)</td>
</tr>
<tr>
<td>Round Rock</td>
<td>43,000</td>
<td>8%</td>
<td>3,313</td>
<td>369 (9)</td>
<td>171 (20)</td>
<td>41 (81)</td>
<td>29 (115)</td>
</tr>
<tr>
<td>Portland Public Schools</td>
<td>46,596</td>
<td>14%</td>
<td>6,513</td>
<td>355 (19)</td>
<td>535 (13)</td>
<td>92 (71)</td>
<td>56 (117)</td>
</tr>
<tr>
<td>Arlington VG Pub Sch</td>
<td>21,231</td>
<td>14%</td>
<td>2,952</td>
<td>343 (9)</td>
<td>262 (11)</td>
<td>37 (80)</td>
<td>23 (128)</td>
</tr>
<tr>
<td>West Aurora, IL SD</td>
<td>12,725</td>
<td>13%</td>
<td>1,688</td>
<td>120 (14)</td>
<td>101 (17)</td>
<td>21 (80)</td>
<td>13 (130)</td>
</tr>
<tr>
<td>LAUSD</td>
<td>632,881</td>
<td>13%</td>
<td>82,326</td>
<td>4,470 (19)</td>
<td>8,470 (10)</td>
<td>379 (218)</td>
<td>599 (138)</td>
</tr>
<tr>
<td>Tucson Unified SD</td>
<td>56,000</td>
<td>14%</td>
<td>8,092</td>
<td>409 (20)</td>
<td>419 (20)</td>
<td>41 (133)</td>
<td>54 (150)</td>
</tr>
<tr>
<td>Providence</td>
<td>23,695</td>
<td>19%</td>
<td>4,460</td>
<td>340 (13)</td>
<td>339 (13)</td>
<td>40 (111)</td>
<td>28 (159)</td>
</tr>
<tr>
<td>ESD 112</td>
<td>13,764</td>
<td>14%</td>
<td>1,987</td>
<td>55 (37)</td>
<td>158 (13)</td>
<td>20 (100)</td>
<td>12 (166)</td>
</tr>
<tr>
<td>School District and City</td>
<td>Enrollment</td>
<td>% Eligible</td>
<td>1st Grade</td>
<td>2nd Grade</td>
<td>3rd Grade</td>
<td>4th Grade</td>
<td>5th Grade</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------</td>
<td>------------</td>
<td>-----------</td>
<td>-----------</td>
<td>-----------</td>
<td>-----------</td>
<td>-----------</td>
</tr>
<tr>
<td>Rockford IL Pub S</td>
<td>28,973</td>
<td>14%</td>
<td>4,065</td>
<td>336</td>
<td>12</td>
<td>86</td>
<td>334</td>
</tr>
<tr>
<td>Montgomery CtySch</td>
<td>146,812</td>
<td>12%</td>
<td>17,226</td>
<td>1,588</td>
<td>11</td>
<td>93</td>
<td>1,398</td>
</tr>
<tr>
<td>Williamson CtySch</td>
<td>31,292</td>
<td>9%</td>
<td>2,824</td>
<td>213</td>
<td>13</td>
<td>147</td>
<td>400</td>
</tr>
<tr>
<td>Clark Cty School Dist</td>
<td>309,476</td>
<td>10%</td>
<td>32,167</td>
<td>2,247</td>
<td>15</td>
<td>138</td>
<td>1,346</td>
</tr>
<tr>
<td>Milton Public Schools, MA</td>
<td>4,126</td>
<td>15%</td>
<td>611</td>
<td>52</td>
<td>12</td>
<td>79</td>
<td>58</td>
</tr>
<tr>
<td>Miami-Dade</td>
<td>376,264</td>
<td>11%</td>
<td>40,012</td>
<td>2,500</td>
<td>17</td>
<td>151</td>
<td>1,226</td>
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<tr>
<td>Fort Worth</td>
<td>79,885</td>
<td>8%</td>
<td>6,144</td>
<td>520</td>
<td>12</td>
<td>154</td>
<td>450</td>
</tr>
<tr>
<td>Everett Public Schools</td>
<td>6,100</td>
<td>17%</td>
<td>1,049</td>
<td>74</td>
<td>15</td>
<td>83</td>
<td>51</td>
</tr>
<tr>
<td>Burlington Township SD</td>
<td>4,606</td>
<td>14%</td>
<td>648</td>
<td>75</td>
<td>9</td>
<td>61</td>
<td>95</td>
</tr>
<tr>
<td>Agawam Public Schools</td>
<td>4,347</td>
<td>15%</td>
<td>656</td>
<td>39</td>
<td>17</td>
<td>112</td>
<td>100</td>
</tr>
<tr>
<td>Chicago Pub Sch</td>
<td>419,272</td>
<td>13%</td>
<td>52,409</td>
<td>3,753</td>
<td>14</td>
<td>112</td>
<td>2,905</td>
</tr>
<tr>
<td>Atlanta Public Schools</td>
<td>43,443</td>
<td>11%</td>
<td>4,950</td>
<td>431</td>
<td>11</td>
<td>101</td>
<td>224</td>
</tr>
<tr>
<td>Washoe County ScDist</td>
<td>63,310</td>
<td>14%</td>
<td>8,551</td>
<td>472</td>
<td>19</td>
<td>135</td>
<td>325</td>
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<tr>
<td>Austin Pub S D</td>
<td>84,676</td>
<td>10%</td>
<td>8,062</td>
<td>773</td>
<td>10</td>
<td>110</td>
<td>824</td>
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<tr>
<td>Boston Public Schools</td>
<td>54,966</td>
<td>21%</td>
<td>11,534</td>
<td>1,200</td>
<td>10</td>
<td>47</td>
<td>800</td>
</tr>
<tr>
<td>Elgin U-46, IL</td>
<td>40,531</td>
<td>14%</td>
<td>5,658</td>
<td>273</td>
<td>21</td>
<td>148</td>
<td>277</td>
</tr>
<tr>
<td>Memphis City</td>
<td>110,863</td>
<td>15%</td>
<td>16,637</td>
<td>912</td>
<td>19</td>
<td>122</td>
<td>655</td>
</tr>
<tr>
<td>New Bedford</td>
<td>12,692</td>
<td>21%</td>
<td>2,655</td>
<td>204</td>
<td>14</td>
<td>63</td>
<td>205</td>
</tr>
<tr>
<td>Marlborough Public Sch</td>
<td>4,835</td>
<td>25%</td>
<td>1,198</td>
<td>141</td>
<td>9</td>
<td>35</td>
<td>115</td>
</tr>
<tr>
<td>Pittsburgh Pub Schools</td>
<td>28,000</td>
<td>18%</td>
<td>5,096</td>
<td>359</td>
<td>14</td>
<td>78</td>
<td>252</td>
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<tr>
<td>SchDist of Philadelphia</td>
<td>168,181</td>
<td>20%</td>
<td>33,686</td>
<td>1,535</td>
<td>22</td>
<td>110</td>
<td>610</td>
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<tr>
<td>St. Paul</td>
<td>38,086</td>
<td>19%</td>
<td>7,152</td>
<td>523</td>
<td>14</td>
<td>73</td>
<td>536</td>
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<tr>
<td>Somerville, MA</td>
<td>4,987</td>
<td>21%</td>
<td>1,048</td>
<td>85</td>
<td>12</td>
<td>59</td>
<td>90</td>
</tr>
<tr>
<td>Saugus, MA</td>
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<td>15%</td>
<td>462</td>
<td>28</td>
<td>17</td>
<td>108</td>
<td>29</td>
</tr>
<tr>
<td>San Diego Unified SD</td>
<td>132,500</td>
<td>12%</td>
<td>16,300</td>
<td>1,100</td>
<td>15</td>
<td>121</td>
<td>1,300</td>
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<tr>
<td>School Name</td>
<td>Students</td>
<td>% Special Ed</td>
<td>Enrolled</td>
<td>Males</td>
<td>Females</td>
<td>Males/Enrolled</td>
<td>Females/Enrolled</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>----------</td>
<td>--------------</td>
<td>----------</td>
<td>-------</td>
<td>---------</td>
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<td>-----------------</td>
</tr>
<tr>
<td>Houston Indepen SD</td>
<td>200,568</td>
<td>9%</td>
<td>17,489</td>
<td>1,625</td>
<td>11</td>
<td>1,145</td>
<td>16</td>
</tr>
<tr>
<td>Kalamazoo Pub Schools</td>
<td>12,100</td>
<td>14%</td>
<td>1,667</td>
<td>70</td>
<td>24</td>
<td>2173</td>
<td>15</td>
</tr>
<tr>
<td>Worcester</td>
<td>24,825</td>
<td>21%</td>
<td>5,172</td>
<td>254</td>
<td>21</td>
<td>98</td>
<td>36</td>
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<tr>
<td>Baltimore City PubSch</td>
<td>82,824</td>
<td>16%</td>
<td>12,866</td>
<td>1,121</td>
<td>12</td>
<td>74</td>
<td>620</td>
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<tr>
<td>Cleve Hts- UnivHtsCty</td>
<td>6,000</td>
<td>18%</td>
<td>1,100</td>
<td>83</td>
<td>14</td>
<td>73</td>
<td>58</td>
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<tr>
<td>Davenport CommSch</td>
<td>15,302</td>
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<td>188</td>
<td>10</td>
<td>82</td>
<td>287</td>
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<tr>
<td>Averages</td>
<td>71,063</td>
<td>14%</td>
<td>9,042</td>
<td>618</td>
<td>14</td>
<td>106</td>
<td>590</td>
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</tbody>
</table>