Waterford Township School District

Special Education Program Review

Grades Pre K-6

February 2020

EXECUTIVE SUMMARY

PUBLIC CONSULTING GROUP

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I.   INTRODUCTION AND METHODOLOGY

ACKNOWLEDGEMENT

The Public Consulting Group (PCG) team thanks the many individuals who contributed to this review, including its Superintendent, Dr. Brenda Harring; its Business Administrator, Mr. Dan Fox; its Assistant Principal for Elementary Education and Student Supports, Ms. Ashley Power; and its Technology Integration Specialist Ms. Betty Scola. In addition, PCG is appreciative of the teachers, paraprofessionals, building administrators, and families who participated in focus groups and interviews.

INTRODUCTION

The Waterford Township School District (WTSD) is located in Camden County, New Jersey. It is a Pre-Kindergarten to grade 6 school district serving 893 students during the 2019-20 school year; of those students, 16.6% (148) receive special education services and have an Individualized Education Program (IEP). Following the sixth grade, WTSD's students attend school in the Hammonton Public School District.[1] WTSD is one of three PreK-6 school districts in Camden County. Waterford Township is located 24 miles southeast of Philadelphia, PA; its community has over 10,900 residents.

The mission statement of WTSD is:

> *Waterford Township School District, through our progressive, student-centered curriculum and comprehensive system of supports, provides all students with a safe, equitable learning environment that cultivates academic, social, and emotional growth.*
>
> *We encourage the development of personal strengths, a positive self-image, and an appreciation for the uniqueness of each individual. Through community partnerships and engagement, the district provides a strong foundation for students to reach their full potential as they continue their educational journey[2].*

The vision statement of WTSD is:

> *Lighting the path to success, one child at a time.*

WTSD has three schools: Atco Elementary School (grades 1-2); Thomas Richards Early Childhood Center (grades PreK and K); and Waterford Elementary School (grades 3-6). For the 2019-20 school year, WTSD changed the grade configuration to create a dedicated early childhood, PreK-K school, at Thomas Richards School.

Socioeconomically, WTSD is a middle-class community, with a median household income of $93,858.[3] Approximately 25% of its students are eligible for Free and Reduced Lunch.[4] According to NJDOE 2016 Census Poverty Data by Local Education Agency used to make Title 1 funding determinations for the 2018-19 school year, 7.31% of WTSD's students ages 5-17 are in poverty.[5]

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[1] WTSD has a sending/receiving agreement with Hammonton Public School District. In addition, Folsom School District in Camden County also feeds into the Hammonton Public School District.

[2] WTSD Mission Statement: https://www.wtsd.org/Content2/64

[3] US Census, 2014-2018. https://www.census.gov/quickfacts/fact/table/waterfordtownshipcamdencountynewjersey/BZA010217

[4] District provided data: 2017-18: 27%, 2018-19: 24.4%

[5] https://www.nj.gov/education/title1/funding/201819CENSUS.pdf

Important Accomplishments in the 2019-20 School Year

Accolades

In June 2019, WTSD received attention during a visit by the New Jersey Department of Education (NJDOE) for strong overall student performance improvements in state testing. NJDOE was given presentations by the board of education as well as its Superintendent of Schools.

In July 2019, NJDOE announced WTSD as one of eleven school districts, statewide, to earn the designation of Lighthouse District. WTSD earned this designation for substantial improvement in academic achievement. The Superintendent is quoted saying "Our educators continually monitor student progress by keeping a close eye on student performance data. However, we also know that social and emotional skills play a critical role in the development of the whole child."[6]

Programmatic Highlights

The district leadership team provided a comprehensive overview of recent programs that are positively impacting student outcomes:

- **Creation of Dedicated Early Childhood School:** As described earlier, WTSD changed the configuration of its schools to create a building specifically dedicated to Pre-Kindergarten and Kindergarten, known as the Thomas Richards Early Childhood Center.

- **The GO Math! Program**: This initiative has helped to strengthen math concepts for students by engaging them in a new way of learning. Number talk discussions among students allows them to think differently about math and numbers. The successful implementation of GO Math! can easily be attributed to the 5E instructional model of engage, explore, explain, elaborate, evaluate. This model promises to transform planning and teaching and develops mathematical understanding in students.

- **District participation in the Literacy Leadership Team Institute hosted by Lesley University in Massachusetts**. During the 5-day training, Waterford administrators and teachers learned how to build a culture of collaboration. This work guided the team in developing a common vision of literacy teaching and learning. While at the training, the team focused on lesson planning and student assessment while reviewing research-based models for school improvement, including Literacy Collaborative. Through the work they completed together, participants can actively work to improve student outcomes in reading and writing.[7]

- **Wilson Fundations K-3, all special education teachers/co-teachers and piloting in several general education classrooms**. Based on the Wilson Reading Program, Fundations provides K-3 classrooms with a systematic program in the foundational skills for reading spelling, emphasizing phonemic awareness, phonics-word study, high frequency word study, fluency, vocabulary, handwriting, and spelling.

- **The Friday "Coffee Cart."** A pre-vocational opportunity for students grades 3-6, promoting engagement outside of the self-contained classroom as well as functional and academic skills through coffee sales to teachers and adults in the school building.

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[6] Waterford School District Designated as Lighthouse District for Academic Achievement, South Jersey Observer. https://southjerseyobserver.com/2019/08/01/waterford-school-district-designated-as-lighthouse-district-for-academic-achievement/

[7] As noted in the South Jersey Observer: https://southjerseyobserver.com/2019/06/17/waterford-school-district-recognized-for-strong-improvements-in-state-assessments/

Noteworthy Challenges

Administrative Turnover and Inconsistent Operating Practices

In recent years, WTSD had turnover in the Director of Special Education role. In prior years, WTSD had a 0.5 FTE Special Education Director who it shared with Hammonton Public School District. In June 2017, this arrangement ended. Following that, WTSD had an interim special education director. In 2019-20 school year, it hired a full-time Assistant Principal for Elementary Education and Student Support Services to serve as the district's dedicated leader of special education programming. According to staff, this turnover has impacted consistency in operating practices. In addition, these changes brought significant differences in leadership styles which gave Child Study Teams (CSTs), special education teaching staff, and paraprofessionals varying levels of autonomy, guidance, and communications.

Parent Engagement

According to information from interviews and focus groups, the district has struggled with parent engagement among parents of students with disabilities. WTSD has a Special Education Parent Advisory Group (SEPAG) that it shares with the Hammonton Township School District. However, WTSD recently became part of this SEPAG in the 2018-19 school year. Prior to that point, WTSD did not have a SEPAG.

Limited Data Use to Inform Special Education Instruction and Programming

According to WTSD administration, the district has struggled to leverage student outcomes data to inform special education instruction and programming. Although WTSD has created a robust data culture around its RTI initiative, there is an overall lack of vision for data use as it relates to special education. PCG found limited evidence to support that WTSD's special education program has been using data – including outcomes data that may be readily available – to inform policies, programming, or practices.

In addition, as a department, the Office of Student Support Services has not embraced a culture of innovation around data use. Examples of this are especially apparent as it relates to the creation of IEPs with inconsistent Present Levels of Academic and Functional Performance (PLAAFP) statements and measures of success; inconsistent student academic goals that are **S**pecific, **M**easurable, **A**ttainable, **R**elevant, and **T**ime Bound; and inconsistent and subjective IEP progress reporting.

Significant Achievement Gaps on State Testing for Students with IEPs

Although WTSD was recently awarded the Lighthouse District designation by the New Jersey Department of Education, the achievement gaps for students with IEPs in all tested grades are concerningly notable. Over the past four years of state testing in grades 3 to 6 on both the Partnership for Assessment of Readiness for College and Career (PARCC) assessment and the New Jersey Student Learning Assessment (NJSLA), there has been only one instance when WTSD's students with disabilities met or exceed expectations at a rate higher than the New Jersey population of students with IEPs as a whole—5th grade math in 2017-18. Generally speaking, the district's students with disabilities who are meeting or exceeding expectations has been well below the state's rate of students with IEPs in that category.

These gaps are especially apparent in the 2018-19 administration of the NJSLA:

- Math
  - Grade 3: 5% of WTSD students with IEPs are meeting or exceeding expectations whereas 31% of New Jersey students with IEPs are
  - Grade 4: 7.7% of WTSD students with IEPs are meeting or exceeding expectations whereas 25% of New Jersey students with IEPs are
  - Grade 5: 10% of WTSD students with IEPs are meeting or exceeding expectations whereas 19% of New Jersey students with IEPs are
  - ***Grade 6: None of WTSD's students with IEPs are meeting or exceeding expectations whereas 12% of New Jersey students with IEPs are***

- English Language Arts
  - Grade 3: 9% of WTSD students with IEPs are meeting or exceeding expectations whereas 24% of New Jersey students with IEPs are
  - Grade 4: 7.7% of WTSD students with IEPs are meeting or exceeding expectations whereas 26% of New Jersey students with IEPs are
  - Grade 5: 20% of WTSD students with IEPs are meeting or exceeding expectations, whereas 23% of New Jersey students with IEPs are
  - ***Grade 6: None of WTSD's students with IEPs are meeting or exceeding expectations whereas 19% of New Jersey students are.***

These data are cause for concern – the district will need to act with urgency to address these gaps in a manner that is strategic, consistent, transparent, and across department lines (including Curriculum and Instruction, Special Education, and building leadership). These themes will be addressed throughout this report.

Finances

District administration has expressed frustration that they have not been able to forecast recent cost drivers because of a lack of communication between the past administration of the Office of Student Support Services and the Office of the Business Administrator. The Office of the Business Administrator has expressed concerns that past special education budgets, and the past administrators in that role, did not provide ample justification using areas of need and outcomes data to inform personnel hiring and programming decisions.

The district administration noted a steady increase in children being placed in out of district schools with a limited understanding of the root cause for the shifts. At the same time, the number of paraprofessionals who support students with disabilities has doubled from 10 in the 2018-19 school year to 23 in the 2019-20 school year. In addition, the district hired three new special education teachers in the 2019-20 school year and anticipates adding three new positions in the 2020-21 school year. According to district administration, these areas have become notable cost drivers for the special education budget.

The district's lack of data use to inform programming is apparent and its consequences are far reaching. One unanticipated consequence may be the under-resourcing of special education programs specific to students who may benefit from a less restrictive placement (e.g. from being among typical peers less than 40% of the day to 79-40% of the day). For example, the district has not had any Pull Out Resource classrooms in over five years, instead possibly placing students in settings that may be more restrictive. Although WTSD's overall IEP classification rate is consistent with other districts, over 33% of all students with disabilities are in the general education setting less than 40% of the day, a rate that is twice as high as the state average and significantly higher than peer and neighboring districts.

Thus, as the district expands the number of more inclusive learning environments for students with disabilities, the increasing budget may be the result of a course correction for its special education programs. Nevertheless, it will be essential that the district's Office of Student Support Services leverage student outcomes data to support the expansion of less restrictive individualized special education programs to meet the unique needs of students with IEPs. Program placement should be based on and driven by individual student needs and not dictated by what the district offers or what may be structurally convenient.

PURPOSE OF STUDY

This final special education report, presented to the Superintendent of Schools on February 14, 2020 describes the current state of the special education program in WTSD and is designed to guide the district to continuous improvement. The district's administration has expressed its eagerness in using the

actionable recommendations from this final report to support the role and serve as a roadmap for WTSD's new Assistant Principal for Elementary Education and Student Support Services.

This report examines the following evaluation questions and areas of focus:

1. *To what extent does WTSD support struggling learners who may be referred to a Child Study Team (CST) through its **Intervention and Referral Services (I&RS) and Response to Intervention (RTI)**?*
   - *Intervention Implementation*
   - *Referrals*

2. *To what extent do the **instructional services** in WTSD meet the needs of students with disabilities within the district?*
   - *Self-contained Classes*
   - *Resource Classes*
   - *Inclusion Classes and Co-teaching*
   - *Restraint and Seclusion Practices*
   - *Out-of-district Placement*
   - *Student Achievement*
   - *Program Models*

3. *To what extent is WTSD meeting the needs of students with disabilities and their families in the area of **student Individualized Education Programs (IEPs) and special education standard operating practices**?*
   - *Goals and Objectives in the IEP*
   - *Present Levels of Academic Achievement and Functional Performance (PLAAFP) in the IEP*
   - *Accommodations and Modifications*
   - *Transitional Services*
   - *Related Services*
   - *Data Use*

4. *How does WTSD organize its **staffing** to support students with disabilities?*
   - *Administration*
   - *Teachers and Paraprofessionals*
   - *Secretarial*

5. *To what extent do WTSD's **internal and external communication** practices foster collaboration among staff and families in support of students with disabilities?*
   - *Staff and Parent Engagement and Communications*
   - *Perceptions of Administrators, CST Members, Teachers, Parents, Students, and Community Members*

6. *To what extent does WTSD utilize its **financial resources** to support high quality outcomes for students with disabilities?*
   - *Major Cost Drivers*
   - *Management of Finances*
   - *Greater Opportunities for Efficiencies*
   - *Extraordinary Aid*

METHODOLOGY

During the 2019-20 school year, PCG conducted a mixed-methods study of the special education program in WTSD. The findings and recommendations related to programs, policies, and practices resulted from a comprehensive analysis of several data sources. Sources included **(1) Data and Document Analysis; (2) Focus Groups and Interviews; and (3) Student File Review Focus Groups**. These components drew from research and practice literature to inform the findings and recommendations. PCG used publicly available achievement and financial information to compare key WTSD statistics against local district, state, and national data.

Data and Document Analysis

Population Trends, Programs, Achievement, and Outcomes Analysis

As part of this review, PCG analyzed special education population trends, programs, and achievement outcomes. PCG compared student identification rates and outcomes by disability, ethnicity, gender, and other demographic variables.

Population and program placement trends are significant equity indicators of the extent to which there is overrepresentation of any group in the special education population. They also provide important information about the distribution of the special education population in placements that represent the least restrictive environment. Population trends were analyzed to show, where possible, changes over time by grade level/age, race/ethnicity, disability categories, level of service, and combinations of variables. Student performance data were analyzed to provide a comparative examination of performance by both students with and without disabilities.

Staffing Analysis

In partnership with the Council of the Great City Schools, PCG has compiled special education staffing ratios from approximately 70 school districts (very large to very small) nationwide. The District's staffing ratios were incorporated into these data to consider WTSD staffing information in a broader context.

Staffing comparison data have been used to evaluate the extent to which staff roles, responsibilities, and training are aligned to WTSD's expectations.

Document Review

PCG reviewed nearly eighty documents for information related to district and school structures, programs, policies, and practices. Documents reviewed were in the following general categories:

- Organizational structure, staffing, and resource allocation
- Description of academic programs, services, interventions, and activities
- Documents regarding instruction and professional development
- District procedures and guides, including improvement plans
- Compliance and due process complaints
- Fiscal information
- NJDOE reports
- Measures concerning accountability

Focus Groups

Organizational Focus Groups and Interviews

In October 2019, PCG spent one day conducting two sets of focus groups: organizational focus groups/interviews; and student file review focus groups. During these focus groups and interviews, over 47 district staff and 8 parent stakeholders participated.

PCG worked closely with WTSD to determine the best outreach and communication methods for focus group and interview participation. PCG provided a sample schedule and list of positions required to participate. Student file review focus groups for special education teachers and related service providers were scheduled during the school day. The district also sent an announcement to parents/families inviting them to participate in one evening focus group session.

Within this report, no focus group or interview participants are personally referred to or quoted directly, although position titles may be referenced in some cases when necessary for contextual reasons.

In order to gain an understanding of how special education programs operate broadly within the district, organizational focus groups and interviews were designed to include a range of stakeholders. Focus groups generally consisted of 5 to 8 participants, while interviews ranged from 1-7 participants.[8] Supervisors did not participate in the same focus group or interview sessions with their staff members, in order to give all staff an opportunity to speak candidly and honestly.

WTSD focus groups and interviews included a variety of central office staff, school-based staff, and family participants.

Central office staff included representatives from the following departments/offices:

- Office of the Superintendent
- Office of the Business Administrator
- Office of Student Support Services

School based staff included representatives from the following groups:

- School-based Administrators
- Special Education Teachers
- General Education Teachers
- Related Service Providers

Family and Community representatives included:

- Parents/Families

Student File Review Focus Groups

PCG conducted a series of student-centered file review focus groups that allowed for conversation about school-based practices, and a review of redacted student IEPs. Through this records review, PCG addressed themes related to special education management, student identification, programs and services, curriculum and instruction and staffing, while addressing specific process questions about the development of IEPs, their implementation, and documentation. Participants included special education teachers and related service providers and CST members.

Student records included a wide cross-section of schools, ages, gender, and disability categories. WTSD staff provided relevant documents associated with the selected students for discussion. Approximately 1-2 student records were discussed during each focus group session.

THE PCG APPROACH

PCG's approach to its work with state, county, and district organizations is as a thought partner. That is, we act as an outside agent, with an objective perspective, who works alongside educational entities to identify challenges and provide recommendations for improvement. We follow a mixed methods

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[8] The exception to this was the teacher and paraprofessional focus group, which had over 18 teachers and paraprofessionals.

Collaborative Program Evaluation model that is systematic, based upon both qualitative and quantitative research methods, and produces credible and valid data that proactively informs program implementation, determines gaps, and offers recommendations for the continued improvement of the program.[9] We value the importance of developing trust, open communication, and fostering collaboration between the review team and program staff.

Our philosophy for guiding the transformation of special education in schools and districts is driven by the U.S. Department of Education's Results Driven Accountability (RDA) framework and rooted in key tenets of the Schoolwide Integrated Framework Transformation (SWIFT) model.

Results Driven Accountability

In 2013, the U.S. Department of Education's Office of Special Education Programs (OSEP) recognized that the educational outcomes of children and youth with disabilities have not improved as much as expected even with intensive federal regulatory oversight and funding provided to address closing achievement gaps. The Department subsequently announced movement toward prioritizing improvement of outcomes for students with disabilities, from a one-size-fits-all, compliance-focused approach to general supervision to a more balanced system that looks at results and outcomes.[10] This approach, known as Results Driven Accountability (RDA), is consistent with the IDEA, which requires the primary focus of monitoring to be on improving educational results and functional outcomes for students with disabilities, and ensuring that states meet IDEA program requirements. RDA fulfills these requirements by bringing into focus the educational results and functional outcomes for students with disabilities while balancing those results with the compliance requirements of IDEA.[11] When providing guidance to school districts, PCG offers recommendations that strike this balance as well.

Schoolwide Integrated Framework Transformation (SWIFT) Model

Based on research related to the improvement of achievement and social/emotional outcomes for students with disabilities, the SWIFT model has received recognition by and support from OSEP.[12] SWIFT refocuses existing traditional educational approaches to general and special education and expands inclusiveness for students covered by Title 1, those from low-income backgrounds and English Learners (ELs).

According to researchers and practitioners at the University of Kansas, and as validated by members of the PCG review team's experience working with districts nationally, there are six critical issues facing public schools:

(1) fragmented support "silos" and lack of family partnership with schools;

(2) achievement gaps between subgroups of students based on social, language and/or disability characteristics;

(3) lack of student engagement and behavior that impedes learning;

(4) lack of implementation of both systems level and student-level evidence-based interventions with fidelity;

(5) lack of knowledge sharing and resource availability; and

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[9] Donis-Keller, C., Meltzer, J., and Chmielewski, E. (2013). The Power of Collaborative Program Evaluation, A PCG Education White Paper. Available from http://www.publicconsultinggroup.com/media/1272/pcg_collaborative_evaluation.pdf

[10] April 5, 2012, RDA Summary, U.S. Department of Education. https://www2.ed.gov/about/offices/list/osers/osep/rda-summary.doc

[11] *Id.*

[12] The SWIFT Center's work was supported by a $24.5 million grant from the U.S. Department of Education's Office of Special Education Programs to support SWIFT implementation in states and school districts across the country and remains one of the leading frameworks for school improvement. See for more information see the SWIFT website at http://www.swiftschools.org

(6) lack of sustainability and replication of successful schoolwide models of inclusive education.[13]

SWIFT's core domains for school and district improvement are backed by research and growing evidence that addressing the above six issues is critical for improving outcomes for SWDs. The domains include a Multi-Tiered System of Supports (MTSS), which provides interventions and support for students at varied levels of intensity and focuses on the importance of good first teaching, and a Universal Design for Learning (UDL) curriculum and instruction. It aims to build school capacity to provide academic and behavioral support to improve outcomes for all students through equity-based inclusion. The domains, in detail, are:

- **Administrative Leadership**. A deeply engaged administrative leadership that is committed to transformative inclusive education.
- **Multi-Tiered System of Supports (MTSS)**. Use of a MTSS where all academic and behavioral instruction is delivered through a schoolwide data-driven system utilizing universal design at all grade levels.
- **Integrated Educational Framework**. A strong and positive school culture creates an atmosphere in which everyone feels like they belong. To the extent possible, all students participate in the general education curriculum instruction and activities of their grade level peers. Schools embrace ways to redefine roles of paraeducators and teaching assistants to support all students.
- **Family/Community Partnerships**. Family and community partnerships are formed, and families are actively engaged in both the organizational makeup of the school as well as their child's education.
- **Inclusive Policy Structure & Practice**. District-level support and integrated policy structure are fully aligned and remove barriers and misconceptions surrounding implementation.

In addition, PCG emphasizes the need for intentional support that takes into consideration students' linguistic and cultural diversity. Districtwide and schoolwide practices based on these components provide a practitioner-focused, research-based, and federally recognized approach to improving academic/social emotional outcomes for all students, including students with disabilities and other students who have not achieved at or above expected levels of proficiency.

MEMBERS OF THE PCG REVIEW TEAM

PCG's team members include:

- **Matthew Korobkin**, Project Director. Former Special Education Officer for Strategic Planning and Evaluation, Office of the Secretary, Delaware Department of Education.

- **Elaine Lerner**, Subject Matter Expert and Project Support. Former Administrator at the New Jersey Department of Education.

- **Dr. Jennifer Meller**, Project Advisor. Former Director in Specialized Services for the School District of Philadelphia.

- **Ajanta Shah**, Data Liaison. Former Data Administrator to School Districts in New Jersey.

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[13] Swift Schools. http://www.swiftschools.org/sites/default/files/SWIFT%20FIT%20Technical%20Adequacy%20Report.pdf

II. SUMMARY OF RECOMMENDATIONS

REFERRAL AND ELIGIBILITY

Child Find

Child Find Commendations:

- ✓ **WTSD has a dedicated link on its home page to a detailed PDF on Child Find.**

Child Find Recommendations:

- • **Add a detailed description of Child Find to the Student Support Services webpage, in addition to its present location on the WTSD website.**

PREREFERRAL: INTERVENTION AND REFERRAL SERVICES (I&RS) AND A MULTI TIERED SYSTEM OF SUPPORT (MTSS)

Intervention and Referral Services (I&RS)

District I&RS Commendations:

- ✓ **WTSD has written operating procedures and uses consistent documentation for its I&RS.**

I&RS Recommendations:

- • **Ensure that paper and pencil paperwork and processing requirements are not cumbersome for staff.**
- • **Enhance I&RS process by leveraging an online early warning and intervention management system that automates I&RS process, serve as a step-by-step tool throughout the intervention, and subsequently store intervention and progress monitoring data.**
- • **Through professional development, ensure staff understand that I&RS is not necessarily a prerequisite for a special education referral.**

Response to Intervention

District RTI Commendations:

- ✓ **WTSD has committed significant resources to develop a districtwide RTI.**
- ✓ **WTSD has written operating procedures and uses consistent documentation for its students receiving interventions through its RTI.**
- ✓ **WTSD has instilled a data culture among its RTI interventionists and teachers.**

District RTI Recommendations:

- **Include social emotional and behavioral well being int the district's RTI model; leveraging the state's NJTSS or PBSIS models.**
- **Consider leveraging the NJTSS model as it interconnects both academic supports with social/emotional; NJDOE recently released a handbook on NJTSS that may be a useful tool in the district aligning its RTI to NJTSS:**
  https://www.nj.gov/education/njtss/guidelines.pdf
- **Discontinue use of the words 'eligibility' and 'placement' as it relates to providing RTI tiered interventions. These words possibly cause confusion with special education services. RTI should be part of all instruction and therefore students need not be 'eligible' for it.**
- **Ensure students are moving through tiered interventions when it is appropriate; ensure that students are not locked in a more intensive tier (e.g. Tier II or II) when it may be appropriate to moved to a lower tier of support.**
- **Enhance I&RS process by leveraging an online early warning and intervention management system that automates I&RS process, serve as a step-by-step tool throughout the intervention, and subsequently store intervention and progress monitoring data.**
- **Ensure staff and administration fully understand that RTI is not a substitute for classifying a student who has a disability.**
- **Ensure that students with IEPs are not precluded from receiving RTI interventions when it may be appropriate. Students with IEPs may also receive Title I funded interventions, included RTI initiatives funded with IDEA resources.**
  - **Reach out to NJDOE County Office for further assistance on co-mingling federal resources.**
- **Discontinue use of "Tier II student" or "Tier III" student; RTI is intended to be fluid.**
- **Consider removing the Title I nomenclature from the district-titled 'Title I RTI' programming.**

SPECIAL EDUCATION REFERRAL, EVALUATION, AND DETERMINATION OF ELIGIBILITY

Special Education Referral in WTSD

Referral Commendations:

- ✓ **WTSD has attempted to create a data-informed referral process by requiring building administrators complete a CST Referral Packet.**
- ✓ **WTSD uses student benchmark data for math and ELA to inform CST referrals.**

Referral Recommendations:

- **Redesign contents of packet to clearly identify required versus optional contents.**
    - **Remove requirement of building administrator "sign off" – promptly direct all completed packets to the leader of the Office of Student Support Services.**
    - **Include nurse participation but do not mandate a nurse "sign off" that could possibly slow process.**
    - **Remove sections of the form that are already part of the student's master file (e.g. parental custody agreements, language spoken at home).**
- **As part of compliance training, reinforce that staff may make referrals with and/or without administrator "sign off."**
- **Automate the district's CST referral packet process by including this process in the configuration of the district's IEP case management system.**

Special Education Evaluation and Eligibility in WTSD

90-Day Timeline Commendations:

- ✓ **100% of children who were evaluated for special education services received their evaluations on tine.**

90-Day Timeline Recommendations:

- **Consider using an IEP case management system with robust reporting features to avoid the duplication of efforts in assuring compliance.**

EARLY CHILDHOOD
Supports and Services

Early Childhood Supports and Services Commendations:

- ✓ **WTSD has made recent, significant investments to early childhood programming (1) dedicating a school whose resources are committed to early childhood; (2) applying for the NJDOE expansion grant with the intent of significantly increasing the district's programming for preschool students with disabilities.**

Early Childhood Supports and Services Recommendations:

- **Through professional development, ensure that special education teachers in grades K-2 are familiar with the curricular connections between the district's preschool curriculum (Creative Curriculum) and school age curriculum.**

SPECIALLY DESIGNED INSTRUCTION AND INCLUSION IN THE GENERAL EDUCATION SETTING

Universal Design for Learning (UDL)

Universal Design for Learning Commendations:

- ✓ **WTSD has a 1:1 Chromebook initiative in which many of its instructors are leveraging key aspects of UDL.**

Universal Design for Learning Recommendations:

- • **Engage staff in trainings on UDL. Consider leveraging existing trainings and materials offered by NJDOE.**
- • **Embrace UDL strategies that many staff are already engaging in through the 1:1 district Chromebook initiative.**
- • **Embed UDL in the district's RTI.**

Special Education Programs Offered in WTSD

Special Education Programming Commendations:

- ✓ **63.3% of all students with disabilities are in the general education setting more than 80% of the day.**
- ✓ **WTSD is committing resources to support struggling learners by providing Wilson Reading certification to the teachers who will be providing ELA Pull Out Resource programming in the 2020-21 school year.**

Special Education Programming Recommendations:

- **Considering over 33% of all students with disabilities are in the general education setting less than 40% of the day, a rate that is twice as high as the state average, focus on building programs in less restrictive environments (between 79-40% of the day with general education students).**
  - o **Significantly reduce the number of students with IEPs in a more restrictive environment by offering more Pull Out and In Class Resource programs.**
  - o **Include students with IEPs in RTI programs, as considered appropriate by IEP teams.**
  - o **Engage district contracted behaviorist to assist in assessing need and co-creating high quality BD programming**
- **Ensure WTSD is offering its students with disabilities a full continuum of services; create programs based on student need.**
- **Using student data create programming based on student need and not staffing availability (e.g. Pull Out math and ELA).**
  - o **Data should include benchmark data from Fountas and Pinnell Benchmark Assessment, the GoMath! Assessment, and the STAR MATH assessment.**
  - o **Consider providing Pull Out Resource programming in math to address achievement gaps noted by NJSLA data; consider other data sources.**
  - o **Consider providing Pull Out Support programming in math and ELA to address achievement gaps noted by NJSLA data; consider other data sources.**
- **Through professional development, ensure that district administration and staff are fully informed and aware of the continuum of supports for students with disabilities.**
  - o **A particular focus must be made on the fact that programming decisions must be driven by a student's individual needs.**

Out of District Placements

Out of District Placement Commendations:

- ✓ **WTSD is attempting to address the out of district placements of preschoolers in a more restrictive program through its new early childhood center.**

Out of District Placement Recommendations:

- **Focus on building less restrictive programs, in district, for future students who may potentially be placed out of district.**
- **Study the present needs of its students placed out of district.**
- **Actively engage in activities necessary to transition out of district students to a less restrictive placement, as stated in N.J.A.C. 6A:14-3.6(k).**
- **Seek legal counsel with expertise in special education law to provide opinions on matters such as doctors notes for transportation.**

Co-Teaching in WTSD

Co-Teaching Commendations:

- ✓ **WTSD has a desire to ensure it offers co-taught instruction to students with disabilities.**

Co-Teaching Recommendations:

- **Increase the number of co-taught settings to provide more students with IEPs an education in a less restrictive environment.**
- **Agree to a districtwide definition of co-teaching.**
- **Require ongoing, intensive, job embedded training on co-teaching.**

Use of Paraprofessionals in WTSD

Use of Paraprofessionals Commendations:

- ✓ **WTSD has a committed paraprofessional staff who, in some cases, have worked in the district for several years.**

Use of Paraprofessionals Recommendations:

- **Ensure that all decisions about assigning paraprofessionals are made by the IEP team at the IEP team meeting table.**
- **Ensure that all CSTs have access to standard operating procedures that provide guidance on appropriately determining the need of a paraprofessional.**
- **As it relates to supporting students achieve their academic and functional goals as well as behavioral needs articulated in the BIP, ensure paraprofessionals have appropriate access to relevant sections of the IEP, facilitated by the special education teacher.**
- **Consistently document paraprofessionals in the IEP.**
- **Leverage paraprofessionals in supporting students move from a less restrictive classroom setting.**

SUPPORTING STUDENTS THROUGH THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEP)

The Annual IEP and Triennial IEP Team Meetings and IEP Amendments

IEP Meeting Commendations:

- ✓ **According to APR data and staff interviews, IEP meetings are happening in a timely manner.**

IEP Meeting Recommendations:

- **Immediately discontinue any situation in which IEP team members are circumventing the IEP process.**
- **Through professional development and internal monitoring, ensure that when changes need to be made to the IEP, team meetings are being held and amendments are occurring.**
- **Ensure meaningful and authentic engagement of general education teachers in IEP meetings.**
- **Ensure that district personnel be trained in and knowledgeable of procedural safeguards afforded to parents, specifically around obtaining parental consent and amendment of an IEP without holding a meeting.**
- **Engage families in procedural safeguard training, ensuring that IEP decisions are occurring in a compliant manner.**

Case Management of IEPs

Case Management of IEPs Commendations:

- ✓ **The district leverages its IEP case management system for helping WTSD remain compliant for its mandated timelines**

Case Management of IEPs Recommendations:

- **Consider other IEP case management systems that have more robust data and reporting features.**
- **Consider other IEP case management systems to support the district's I&RS and RTI initiatives through early warning and intervention management solutions.**

Present Levels of Academic Achievement and Functaional Performance

Academic and Functional Goals Commendations:

- ✓ **None**

Academic and Functional Goals Recommendations:

- **Conduct professional development for all present and future special education teachers and CSTs on the creation of SMART, standards based academic and functional goals. As needed, provide ongoing professional development.**
- **Include guidance on the creation of goals in a special education standard operating procedures handbook.**
- **Leverage an IEP case management system that supports CSTs and teachers in the creation of high quality, standards based IEPs.**

IEP Progress Reporting

Academic and Functional Goals Commendations:

- ✓ **None**

Academic and Functional Goals Recommendations:

- Conduct professional development for all present and future special education teachers and CSTs on the creation of SMART, standards based academic and functional goals. As needed, provide ongoing professional development.
- Include guidance on the creation of goals in a special education standard operating procedures handbook.
- Leverage an IEP case management system that supports CSTs and teachers in the creation of high quality, standards based IEPs.

Accommodations and Modifications

Accommodations and Modifications Commendations:

- ✓ **None.**

Accommodations and Modifications Recommendations:

- Ensure that decisions about accommodations and modifications are made by the IEP team and informed by data. Ensure staff aren't selecting all available accommodations in the IEP case management system.
  - o Conduct Professional Development
- Disseminate to CST members and teachers the *New Jersey Student Learning Assessment Accessibility Features and Accommodations Manual.*
  - o For relevant IEP team members, conduct professional development

Functional Behavioral Assessments and Behavioral Intervention Plans

Behavior Intervention Plan Commendations:

- ✓ **WTSD consults with a Board Certified Behavior Analyst to create its Behavior Intervention Plans.**

Behavior Intervention Plan Recommendations:

- **Always conduct an FBA before creating a BIP.**
- **Ensure consistent guidance and use of the consulted behaviorist for the creation of student BIPs.**
- **Clarify the role of the district contracted behaviorist. Although the position is contracted, the district should still have a job description that clearly outlines this position's responsibilities.**

Related Services

Related Services Commendations:

- ✓ **WTSD's related service staff are committed to providing services, even in spaces that may be less than ideal.**

Related Services Recommendations:

- **Ensure that confidential counseling sessions are occurring in spaces that are not interrupted by others (e.g. copier room).**
- **Ensure that related services are occurring in spaces that are conducive to the therapies that are occurring.**
- **Seek a legal opinion from a special education attorney on doctors notes that relate to the amount of time a child is on a van or bus.**

Assistive Technology

Assistive Technology Commendations:

- **The district has a 1:1 Chromebook initiative; it is leveraging this initiative to meet the needs of students with disabilities through accessibility features.**

Assistive Technology Recommendations:

- **Rely on the expertise of a qualified assistive technology consultant to conduct evaluations, support IEP teams in selecting appropriate devices/apps, and ongoing service and support for existing devices.**
- **Create standard operating practices to support CSTs around districtwide assistive technology practices.**

Student Supports for Extracurriculuar Activities

Student Supports for Extracurricular Activities Commendations:

- ✓ **None.**

Student Supports for Extracurricular Activities Recommendations:

- As appropriate, address modifications in extracurricular and nonacademic activities in students' IEPs that will enable them to participate in these activities.

RESTRAINT, SECLUSION, AND TIME OUT
Restraint, Seclusion, and Time Out in WTSD

Restraint and Seclusion Commendations:

- ✓ The district has indicated that seclusion is not allowed in any of its buildings.

Restraint and Seclusion Recommendations:

- Require consistent documentation on student restraint.
- Ensure the district maintains a log of all restraints, with specific details on the restraint.
- Ensure teachers and paraprofessional staff that work with students with behavioral challenges receive CPI training in a timely manner.
- Revise board policy to be consistent with district policy that it does not seclude students.
- Form a Human Rights Committee to ensure that all restraints are monitored and reviewed, at least quarterly.

MEDIATION AND DUE PROCESS
Dispute Resolution

Due Process and Mediation Commendations:

- ✓ WTSD has very few special education disputes that either go to voluntary mediation, due process hearing, or complaint to the NJDOE.

Due Process and Mediation Recommendations:

- None.

LEADERSHIP
Superintendent and Assistant Principal for Elementary Education and the Office of Student Support Services

Organizational Structure Commendations:

- ✓ **The Assistant Principal for Elementary Education and Student Support Services is a 1.0 FTE position that reports directly to the Superintendent.**

Organizational Structure Recommendations:

- • **Engage in further communications with staff about the role of the Assistant Principal for Elementary Education and Student Support Services, making it clear to all staff that WTSD has a full time leader of its Office of Student Support Services.**

SPECIAL EDUCATION AND RELATED SERVICES: PERSONNEL RATIOS AND SUPPORT
Staffing Ratios in WTSD

Personnel Headcount Commendations:

- ✓ **Responding to student needs, the district is hiring more special education teachers to provide Pull Out Resource programming.**

Personnel Headcount Recommendations:

- • **Based on individual student needs, continue hiring personnel to ensure that students with IEPs have access to a full continuum of programs and services.**

SUPPORTING EDUCATORS
Professional Development Opportunities

Professional Development Commendations:

- ✓ **WTSD offers its teachers and paraprofessionals six professional development days.**

Professional Development Recommendations:

- **Leverage outcomes data to provide more targeted professional development opportunities to special education teachers and CSTs.**
- **Make data literacy a professional development priority for CSTs and special education teachers.**
- **Secure a CPI trainer who is easily accessible to ensure that mid-year hires are receiving the trainings.**

FINANCE

Special Education Finance

Finance Commendations:

- ✓ **WTSD is utilizing Extraordinary Aid resources to provide for its students with IEPs whose education costs are significant.**
- ✓ **As a share of the total annual operating budget, WTSD has maintained stable spending in special education.**

Finance Recommendations:

- **Establish a workgroup with the Superintendent, the Assistant Principal for Elementary Education, and the Business Administrator that studies the continuum of services being offered in WTSD to ensure that all of its students are receiving FAPE in the Least Restrictive Environment**
  - o **Assess Extraordinary Aid needs**
  - o **Forecast programming needs in advance; develop programs based on student need and not because of capacity or administrative bandwidth**
  - o **Develop new, in-district programming to return students from out of district placements**
  - o **Further study the programming needs of students with disabilities with typical peers between 40-79% of the day.**

DATA USE

Special Education Data Use

Data Use Commendations:

- ✓ **The district's culture of data use for its RTI program can be harnessed as a model for special education.**

Data Use Recommendations:

- **Form a special education data team consisting of the Superintendent, Assistant Principal for Elementary Education and Student Supports, building principals, Child Study Team Members, and a general education teacher and a special education teacher.**
- **Charge the data team to:**
    - **(1) Establish a vision and policy management;**
    - **(2) assess present data management needs;**
    - **(3) lead data inquiry, analysis; and action;**
    - **(4) establish and conduct professional development; and**
    - **(5) engage in ongoing monitoring and communication both internally and across the district.**
- **Focus on initial areas of concern:**
    - **Bridging PARCC/NJSLA Achievement Gaps**
    - **IEP Progress Monitoring**
    - **Programs and Staffing to Meet Individual Needs of Students**

STANDARD OPERATING PROCEDURES

Special Education Standard Operating Procedures

Standard Operating Procedures Commendations:

- ✓ **None**

Special Education Operating Procedures Recommendations:

- **Immediately develop a Special Education Department Standard Operating Practices Manual (SOPM). Ensure the following:**

  - **Public access. Provide public access to the manual by posting the document on the WTSD special education webpage and provide links to available online resources.**

  - **Content. Include criteria, procedures, and practices for each area relevant to the implementation of this report's recommendations.**

  - **Implementation with Fidelity. Once written and published, annually refine and consolidate guidance where appropriate to provide clear expectations and directions to all and provide an institutionalized record to which all staff, including new teachers, can refer and be held accountable.**

  - **Collaboration with stakeholders. Collaborate with teachers, CST members, principals, and SEAC members to consider information and resources that would be useful for each relevant group to include in the manual.**

  - **Parents/Families. In collaboration with local parent and advocacy groups, 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 to further access the information. Ensure training is accessible to all parents.**

Communications

Communications Commendations:

- ✓ **The new Assistant Principal of Elementary Education and Student Support Services has made a concerted effort to improve communications with all staff.**

Communications Recommendations:

- **From the Assistant Principal of Elementary Education and Student Support Services, provide consistent communications to CSTs and staff.**
- **Ensure CSTs are having meaningful communications with general and special education teachers.**
- **Ensure parent communications from the district to families are occurring consistently across all grades.**
  - **Leverage survey response data to ensure that communications are occurring in higher grades (e.g. low response rate among 5th and 6th grade parents).**

Parent Engagement

Parent Engagement Commendations:

- ✓ **WTSD is attempting to better engage with the families of students with IEPs. In Fall 2019 it administered a special education survey.**

Parent Engagement Recommendations:

- **Instead of partnering with Hammonton, create a WTSD SEPAG.**
- **Continue administering surveys to families of students with IEPs.**
  - o **Consider quarterly administration of survey, assuring representation from parents of all grade levels.**