



FINAL REPORT

**Evaluation of APS Services for
Students with Special Needs**

**by the
Public Consulting Group**

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Acknowledgements

The Public Consulting Group (PCG) team would like to acknowledge the many individuals who contributed to this review of Arlington Public Schools' (APS) services to students with special needs. Their efforts were critical to our ability to obtain a broad and detailed understanding of the system in order to present the best possible proposals for improving special education, 504 and related services for the district's students.

This review would not have been possible without the contributions of Lisa Stengle, Regina Van Horne and Amy Ramirez. They organized the team's interviews and provided all the documents and data PCG needed. The team received well-organized and thorough information and the full cooperation of staff during this process. The details were numerous and time-consuming.

PCG would like to recognize Dr. Patrick Murphy for allowing APS to conduct such an extensive, courageous, and time-consuming evaluation. His support was critical to the success of this evaluation.

PCG thanks the many APS staff members with whom we met. Their commitment to the work they do was evident through their comments and earnest feedback. They work passionately to support children with disabilities and to ensure the district serves these students in the best possible manner. A number of APS administrators, in specific, spent substantial time providing and clarifying information and answering questions: Jeffrey Carpenter, Julie Crawford, Kelly Mountain, Kristi Murphy, Aleta Myers, Michelle Picard, Elaine Porter, Francesca Reilly-McDonnell, Carolyn Theill, and Brenda Wilks. PCG would like to thank them for their tireless pursuit of better outcomes for students with disabilities.

Finally, we thank the parents who provided valuable information. We were impressed by their thoughtfulness and respect for the district and its teachers. We offer a special recognition and appreciation to parents Linda Arnsbarger and Nancy Van Doren, and the Arlington Special Education Advisory Committee (ASEAC). APS has formed an unprecedented and exceptionally strong relationship with ASEAC that appears to have been strengthened through the PCG review process and can be leveraged for future collaboration. PCG was impressed by APS's involvement of parents throughout the Request for Proposal (RFP) development, selection process, the review, and extensive and appreciated feedback to this and other documents. As experienced by PCG, the involvement of parents in this process has served to enhance the comprehensiveness and inclusivity of the project.

PCG acknowledges the many successes and achievements of APS that are recognized throughout this report. Overall, the totality of PCG's conversations with APS personnel and with parents reflected a high regard for APS teachers. The teachers are viewed as committed and highly educated, with multiple certifications. Conversations reflected a perception that APS is known for its special education countywide programs, particularly in its support of students with autism, and that parents move from other school districts to enable their children to benefit from them. The following survey results reflect the high regard respondents have for the district and its support for students with disabilities:

- 72% of parents were satisfied with their child's overall special education services.
- 75% of parents agreed that special education staff members, including therapists, are skilled in providing their child with needed services and support.
- 74% of parents believed that APS was providing services to help their child develop skills that will enable him/her to be as independent as possible.

FINAL REPORT

Evaluation of APS Services for Students with Special Needs

January 2013

Although this report documents areas of concern, they are used as opportunities to formulate recommendations designed to improve the academic performance and social/emotional outcomes of students with special needs, who as a group have lagged behind their very high performing peers. PCG's goal is to assist the district in taking a series of actions that are challenging but that would provide an appropriate, effective and accountable career and college ready education for *all* APS students.

Members of the PCG Team

Members of the PCG team for this project included the following individuals:

- Anna d'Entremont, Ed.M., Senior Consultant
- Sue Gamm, Esq., Special Education Consultant and former Chief Specialized Schools Officer for the Chicago Public Schools
- Pat Crowley, Subject Matter Expert, former Special Education Compliance Officer with Boston Public Schools
- Jane Kaplan, MBA, Consultant
- Kathryn Hennigan, Business Analyst
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- Katherine Deptula, Schools Specialist

Appendix A presents brief biographical sketches of core team members.

Foreword

PCG's assessment of APS's support for students with special needs focused on policies, procedures and practices concerning: the use of Intervention Assistance Teams (IATs, special education services provided under the Individuals with Disabilities Education Act (IDEA), and supplementary aids and services provided under Section 504 of the Rehabilitation Act (Section 504). These three areas are described below to facilitate understanding of the information provided in this report. A graphic representation showing how these areas intersect is provided at the end of this section.

Terminology

For the purpose of this report, the terms included below are used to describe students who are receiving IAT services, Section 504 services, and/or special education services under an individualized education program (IEP) services under IDEA. Each of these terms are further defined later in this section.

- **Students with special needs** refers to students with disabilities who have Section 504 plans or an IEP, and to students receiving services under IAT plans.
- **Students with disabilities** refers to students receiving services pursuant to Section 504 plans or IEPs.
- **IAT services** are provided to promote students' success in the regular education classroom. They include strategies, such as alternative or modified learning instruction and/or behavior management techniques.¹
- **Section 504 services** are supplementary aids/services, including related services, governed by Section 504 requirements and are provided pursuant to Section 504 plans.
- **IEP services** are special education and supplementary aids/services, including related services, governed by IDEA requirements and are provided pursuant to IEPs.

TERMS	IAT Plan	IEP	Section 504 Plan
Special Needs	X	X	X
Students with Disabilities		X	X
IAT Services	X		
Section 504 Services		X	
IEP Services			X

Intervention Assistance Teams

According to APS's Special Education Policies and Procedures, Appendix AA, IATs operate through an informal collaborative process to help promote students' success in the general education class. Intervention strategies are used to support improvement in student academic achievement and positive behavior.

In this report, PCG introduces the concept of Multi-Tiered System of Supports (MTSS) to the district. MTSS has emerged in literature and practice to describe a comprehensive framework that integrates

¹ APS Early Intervention for Students with Special Learning Needs: Intervention Assistance Teams (IAT), Appendix V, Special Education Policies and Procedures Implementation Manual.

assessment and intervention in a schoolwide, multi-tiered prevention system to maximize student achievement and reduce behavior problems.² The framework is based on a presumption that no matter how effectively high-quality curriculum aligned to state standards is developed, supported and implemented, some students will need additional support and interventions to be successful.³

The foundation of MTSS is a high-quality general education core curriculum that provides all students with an opportunity to increase learning. Through a universal design for learning, barriers are removed or reduced for diverse learners, including English Language Learners (ELLs) and/or 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. For ELLs and standard-English learners alike, MTSS incorporates teaching that is culturally responsive and linguistically appropriate, explicit and rigorous.

When implemented according to established standards, MTSS provides an earlier and more appropriate identification of students who are not on track academically and/or socially, allowing for the application of differentiated instruction and intervention as soon as a need is identified. For example, almost half of U.S. students who receive special education have a learning disability related to reading.⁴ Under an MTSS framework, students do not have to exhibit significant academic failure or behavioral difficulties before they receive focused support; as a result, significantly greater percentages of students are likely to meet expected grade level standards. Moreover, the framework leads to greater student engagement and decreased discipline referrals, as well as fewer students requiring special education services. These outcomes help to reduce the disproportionate special education representation of students from various racial/ethnic groups and of students with developing levels of English proficiency. Moreover, special education resources can be deployed in a more concentrated fashion to those students who require more intensive support than those provided through general education.

Individuals with Disabilities Education Act

IDEA, which is supplemented by Virginia provisions, establishes standards for the provision of a free appropriate public education to students with disabilities who require special education and related services to benefit from an education. These standards establish parameters for: the identification and evaluation of students suspected of having one or more of 14 specified disabilities, and the provision of special education/related services in the least restrictive environment (LRE) that are based on an individualized education program (IEP) plan.⁵ A complex system of procedural safeguards governs this process.

² The term MTSS is included in draft language for the reauthorized federal Elementary and Secondary Education Act. Also, the terms Response to Intervention (RtI) and Positive Behavior Intervention and Support (PBIS) are frequently used across the country to refer to the process for providing interventions and support for academic (RtI) and positive behavior (PBIS). PCG's review included a consideration of APS's IAT process and how it aligns with MTSS framework standards.

³ Information in this section was adapted from the Council of the Great City Schools publication, *Common Core State Standards and Diverse Urban Students: Using Multi-Tiered Systems of Support* at www.cgcs.org/domain/8/. Although the document refers to the Common Core State Standards, the description of the MTSS framework is relevant to support instruction based on the Virginia Standards of Learning (SOL).

⁴ [Statement by Dr. Reid Lyon before the House Committee on Education and the Workforce Subcommittee on Education Reform \(2002\)](http://www.hhs.gov/asl/testify/t020606a.html) at <http://www.hhs.gov/asl/testify/t020606a.html>.

⁵ Specific learning disability, speech/language impairment, intellectual disability, emotional disturbance, autism, other health impairment (including attention deficit hyperactive disorder (ADHD)), hearing impairment (including deafness), visual impairment (including blindness), orthopedic impairment, traumatic brain injury, deaf-blindness, or multiple disabilities.

State Performance Plan

Based on an established set of indicators, each state monitors school districts in specific areas through a State Performance Plan (SPP), such as: Standards of Learning (SOL) achievement, graduation and dropout rates; disproportionate representation by race/ethnicity; placement rates in general education and more restrictive settings; disciplinary out-of-school suspensions/expulsions, etc. The last two indicators are monitored also by race/ethnicity student subgroups.

Relationship between MTSS & Special Education Eligibility

Factors other than a disability may account for students having difficulty in language and literacy (as well as numeracy). Such factors may include the nature of a student's educational opportunity, as well as teaching practices or assessment tools that, for example, are insensitive to cultural or linguistic differences.⁶ Other circumstances might include children with limited oral language and literacy experiences who arrive in the classroom behind in vocabulary development, print awareness abilities, and phonological abilities; or a lack of early child-centered written materials in the house or nutritious food.⁷ When implemented with fidelity, however, MTSS can help ensure that these factors are not primarily impacting student achievement as staff members consider making a special education referral or determining eligibility for special education services.

Inclusive Education

One of the overriding principles of IDEA is the education of students receiving special education services in the least restrictive environment, which is based on a presumption of education in the general education setting. However, if the IEP team determines that the nature or severity of a student's disability is such that his/her education in the general education setting with the use of supplementary aids/services cannot be achieved satisfactorily, the team may plan for the student to receive special education/related services in a separate class. In such cases, the removal from a general education class is proportionate to need, ranging from a class portion to full-time placement.

Although the LRE requirement has received much attention since IDEA's 1975 enactment, the provision's relationship to academic achievement was reinforced by No Child Left Behind's emphasis on accountability and student subgroup reporting, which includes the subgroup of students with an IEP. Over time, research and educational practices have highlighted instructional practices that enable more students who receive special education services to be educated successfully within the general education setting for most of the school day, i.e., at least 80% of the time.

Generally, instruction provided in effective inclusive settings enables all students, including those with disabilities, to learn more and have improved outcomes. These settings include such characteristics as: flexible groupings, differentiated instruction, sufficient support, thoughtful and proactive scheduling, appropriate and adaptive materials, and well-trained special and general educators who collaborate and co-plan. Research has consistently reported a positive relationship between inclusive and effective instruction and better outcomes for students with disabilities, including higher academic performance, higher likelihood of employment, higher participation rates in postsecondary education, and greater

⁶ *Response to Intervention Guiding Principles for Educators from the international Reading Association* at http://www.reading.org/Libraries/Resources/RTI_brochure_web.pdf.

⁷ For example, see Hart and Risley's celebrated research, "Meaningful differences in the everyday experience of young American children," showing the long-time impact that insufficient oral language, including language giving positive reinforcement, for preschool children has on learning. Hart, B., & Risley, R. T. (1995). Baltimore: Paul H. Brookes. See also University of Oregon's Big Ideas in Beginning Reading at http://reading.uoregon.edu/big_ideas/voc/voc_what.php.

integration within communities. There is also research showing that the inclusion of students with a range of disabilities in general education classes does not impact the achievement of their nondisabled peers.⁸ When special educators teach students from as many as four grades in one class, it is extremely difficult, if not impossible, for them to focus on each grade's standards with any depth or effectiveness.

When schools are organized in an inclusive manner, they are better able to support students with more significant disabilities and enable more to attend the school they would otherwise attend if not disabled. This model enables more of these students to attend school within their community, supports a more natural proportion of students with an IEP in each school, and reduces transportation time and costs.

Section 504

Section 504 is a civil rights law that prohibits discrimination based on disability in any program or activity receiving federal financial assistance, such as funding from the U.S. Department of Education. Section 504's eligibility standards are significantly broader than IDEA's in several important ways; and the 2007 Americans with Disabilities Act (ADA) amendment expanded the standards further.⁹

As previously discussed, IDEA eligibility requires a student to have at least one of 14 specific disabilities and need special education services to benefit from an education. Section 504, which is less well defined, applies to students with: 1) a physical or mental impairment; 2) that substantially limits; 3) a major life activity.¹⁰ These terms are not limited to lists of specific impairments and major life activities, and eligibility is to be broadly construed:

- There is not an exhaustive list provided for physical or mental impairments "because of the difficulty of ensuring the comprehensiveness of such a list."¹¹
- The nonexhaustive list of major life activities includes items such as: caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, working, etc.
- The term "substantially limits" is not defined and is expected to be construed broadly in favor of expansive coverage to the maximum extent permitted by the law.¹²

When determining a student's eligibility under Section 504, the process must exclude consideration of the ameliorating effects of any mitigating measures that the student is using to accommodate his/her physical impairment, e.g., medication, academic or behavior support, etc.

Section 504 is broader than IDEA in another important aspect. IDEA is limited to students who need special education to benefit from an education. If a student needs related services only, the student is not covered under IDEA. Section 504 does not have this limitation and it includes students who do not need special education. The following graphic illustrates how Section 504 and IDEA intersect.

⁸ See Kalamouka A., Farrell P., Dyson A., & Kaplan, I. (2007, December). The impact of placing pupils with special educational needs in mainstream schools on the achievement of their peers. *Educational Research*, 49(4), 365–382.

⁹ For local education agencies, Section 504 and the ADA have concurrent standards for students.

¹⁰ Section 504 has two additional routes for coverage: 1) an individual has a record of having an impairment; or 2) an individual is regarded as having such an impairment.

¹¹ Protecting Students With Disabilities, Frequently Asked Questions About Section 504 and the Education of Children with Disabilities, Office for Civil Rights, U January 19, 2012 at <http://www2.ed.gov/about/offices/list/ocr/504faq.html>.

¹² Office for Civil Rights, *Questions and Answers on the ADA Amendments Act of 2008 for Students with Disabilities Attending Public Elementary and Secondary Schools* at <http://www2.ed.gov/about/offices/list/ocr/docs/dcl-504faq-201109.html>.

Intersection between Section 504 and IDEA



Students receiving services under Section 504 have a plan that documents their needs, e.g., (non)academic, social, health, etc., and the supplementary aids/services (including transportation) deemed necessary for school and extracurricular activities. These services may include but not be limited to: health related services, extended time for taking tests, positive behavior support, support from a sign language interpreter, etc. Students who meet Section 504 criteria also have procedural safeguards that are similar to, but are not as detailed as, IDEA safeguards.

Relationship between MTSS Framework, Section 504 Services & IDEA 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 based on SOLs 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 these and others who are ELL and/or gifted/talented.¹³

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-based problem-solving and decision-making; instruction is adjusted to continually improve both student performance and the rate at which it progresses. Furthermore, the process is used to assess (using student responses to the instruction) the effectiveness of the tiered instruction/interventions being implemented.

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. As discussed above, the ameliorative effects of mitigating measures, e.g., academic and social/emotional support,

¹³ 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.

cannot be taken into consideration when determining a student’s Section 504 eligibility. MTSS interventions are an example of such mitigating measures; however, the interventions may themselves be supplementary services appropriately included in a Section 504 plan.

Special Education Services

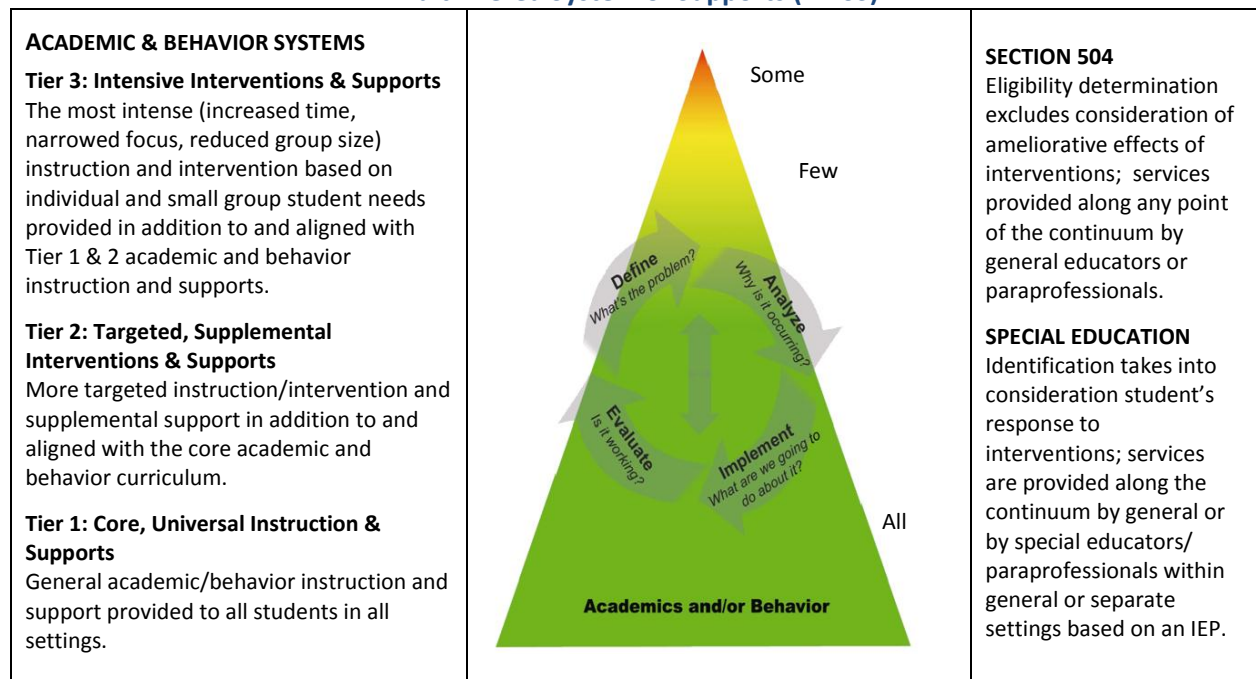
With effective implementation of the MTSS framework, including the early identification of students when they are first having academic and/or social/emotional difficulties, it is more likely that fewer will present a need for a referral for special education services. In some cases, progress monitoring 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.¹⁴ 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.

Graphic Representation

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

Multi-Tiered System of Supports (MTSS)



¹⁴ Tiered Instruction and Intervention in a Response-to-Intervention at Model
<http://www.rtinetwork.org/essential/tieredinstruction/tiered-instruction-and-intervention-rti-model>.

Executive Summary

The Arlington Public Schools (APS) contracted with the Public Consulting Group (PCG) to provide a comprehensive assessment of the district's services to students with special needs. The assessment involved an examination of the effectiveness and efficacy of APS policies, procedures and practices concerning: the use of Intervention Assistance Teams (IATs), special education services provided under the Individuals with Disabilities Education Act (IDEA), and supplementary aids and services provided under Section 504 of the Rehabilitation Act (Section 504). The focus of this evaluation is on the overall effectiveness of these programs, and does not review specific types of services within special education.

Qualitative and quantitative data collection procedures were multifaceted, collaborative, and designed to ensure input from multiple stakeholders. Numerous data collection procedures guided the development of this report, including:

- Outcomes data analysis
- Document review
- Staff, student and parent surveys (*9 total*)
- Interviews and focus groups (*33 total*)
- Case study sessions (*148 student records reviewed*)

PCG provided APS with three interim reports to facilitate timely and ongoing communication with district personnel about information as it was gathered and analyzed. Each of these interim reports targeted distinct areas of the evaluation and shared preliminary findings. This final report brings together the many aspects of the review by highlighting strengths, areas for improvement, and making specific recommendations for future action. PCG has collaborated with APS administrators regarding the development of an action plan to guide the implementation of six core recommendations and five additional recommendations that require less action planning to address.

This final report is organized by seven major themes:

- Section 1. APS Demographics & Academic/Behavior Outcomes
- Section 2. IATs: Administration & Implementation
- Section 3. Section 504: Administration & Implementation
- Section 4. Special Education: Administration & Implementation
- Section 5. ELLs: IAT, Section 504 & Special Education Administration & Implementation
- Section 6. Support for Teaching & Learning for Students with Special Needs
- Section 7. Accountability for Expected Practices & Results for Students with Special Needs

The chart on the following page summarizes the identified areas of strength and opportunities for improvement which are further detailed in this report.

SUMMARY OF STRENGTHS AND OPPORTUNITIES FOR IMPROVEMENT		
Section	Strengths	Opportunities for Improvement
Demographics and Academic/Behavior Outcomes	<ul style="list-style-type: none"> The proportion of students with disabilities by the area of their disability is, as a whole, comparable to national data. Student attendance is high. A larger percentage of students with disabilities passed the Reading and Math SOLs in 2010-2011 than in 2008-09. The graduation rate for students with an IEP exceeds the state target. APS collects a rich pool of data. 	<ul style="list-style-type: none"> Black/African American students are underrepresented in the area of Section 504. Asian American students are underrepresented for IEP and Section 504. Economically disadvantaged students are overrepresented for IEPs and IATs and underrepresented for Section 504. A significant achievement gap remains for students with disabilities compared to their nondisabled peers who have pass rates, at all grades, in reading and math at 90% or above. Achievement data is not centrally collected for students in kindergarten through 2nd grade. Reading and math data is not consistently collected beyond 8th grade. Only SOL scores are centralized and analyzed. Other data used by the district are not centrally collected and used. The Department of Education's Student Growth Percentile is not utilized to track individual student progress.
IATs: Administration & Implementation	<ul style="list-style-type: none"> APS has made progress in implementing the IAT process over the past five years. Staff are familiar with academic/behavior intervention services at their schools and believe parents are encouraged to participate as partners during IAT meetings. Students generally agree that staff explain intervention/IAT services in an understandable way and that the IAT supports and services they receive help them do better in school. 	<ul style="list-style-type: none"> IAT implementation varies greatly from school to school. This includes referral, documentation and protocols for IAT plans. Universal Screening has not been introduced in the district. APS lacks a districtwide and structured approach to the availability and use of interventions in every school and grade level. Staff misunderstand accommodations, modifications and other strategies to be intervention activities. Because student achievement data resides in multiple locations, progress monitoring data analysis is labor-intensive and incomplete.
Section 504: Administration & Implementation	<ul style="list-style-type: none"> APS's Section 504 Procedural Manual was updated. Parents agreed staff included them in Section 504 planning activities and involved them in meaningful 	<ul style="list-style-type: none"> There is a misunderstanding of Section 504 stemming in part from the district's prior procedures. These areas are related to: students with health plans; students with improved performance through the IAT process; the difference between the provision of accommodations and

SUMMARY OF STRENGTHS AND OPPORTUNITIES FOR IMPROVEMENT

Section	Strengths	Opportunities for Improvement
	<p>discussions about their child.</p> <ul style="list-style-type: none"> Students understand why they are receiving Section 504 accommodations. Most staff, parents and students agreed the district's Section 504 processes were being implemented; parents and students confirmed staff explain information and value their input. 	<p>best practices; the difference between Section 504 and IDEA requirements; and standards for determining the application of Section 504's "substantially limits" standard.</p> <ul style="list-style-type: none"> While 73% of staff reported that 504 services were provided consistently, only 31% of parents shared this opinion. Most staff and parents do not consider the professional development they received to be helpful.
<p>Special Education: Administration & Implementation</p>	<ul style="list-style-type: none"> APS special educators are viewed as committed and highly educated. Most parents agreed they are satisfied with their child's special education services. Most students reported positive perceptions of their experiences, believe they are receiving the right level of support and know where to go for help. The Multi-Intervention Program for Students with Autism Spectrum Disorder (MIP-A) program is well-regarded. Strong APS countywide programs have helped reduce the need to send students with an IEP to out-of-district placements. The Experience-Based Career Education Program (EBCE) and Supported Work and Transition Program (SWAT) provide good post-secondary transition activities and services for students. 	<ul style="list-style-type: none"> APS educates a smaller percentage (44%) of students with an IEP in general education at least 80% of the time, compared to 60% at the national level. There are no clear districtwide expectations for co-teaching. General educators' willingness to accommodate students and work with special educators varies greatly. There is an absence of established standards and supports to facilitate collaborative planning between general/special educators. Professional development on strategies for educating students with an IEP in general education classes is needed. As the level of course difficulty increases at the high school level, the percentage of students with an IEP decreases. There was no evident strategy for encouraging students with an IEP to access more advanced courses. The configuration of services for preschool children with an IEP is not based on a model of inclusive education with their nondisabled peers. At the elementary level, students in a special class are in multiple grades, making it more difficult to provide access to each student's grade level core curriculum.

SUMMARY OF STRENGTHS AND OPPORTUNITIES FOR IMPROVEMENT		
Section	Strengths	Opportunities for Improvement
		<ul style="list-style-type: none"> • Parent participation in IEP/placement decisions and the outcome of those experiences vary by school. There was a noted lack of consistency in how schools engage parents and how the eligibility process unfolds. • CLASS does not capture several important data elements related to the instruction of students with special needs. • More attention is required for middle school transition activities.
ELLs: IAT, Section 504 & Special Education Administration & Implementation	<ul style="list-style-type: none"> • The Bridge Manual is filled with excellent material. • The ESOL/HILT checklist is a comprehensive tool that was created to help with the special education identification process. • The Special Education and ESOL/HILT Departments have made deliberate efforts to collaborate and communicate more effectively. They have shared funding and resources to provide professional development opportunities. • APS is working to incorporate the principles of the Sheltered English Instruction Protocol (SIOP) countywide. • Secondary dually certified teachers, when available, collaborate with school staff to provide relevant, appropriate and well thought-out instruction. 	<ul style="list-style-type: none"> • APS personnel have difficulty discerning language and cultural barriers from the cognitive needs of ELLs. Universal training on research-based instruction and intervention for this population is needed. • Bridge Teams vary by school in strength and effectiveness. • The length of the ESOL/HILT checklist distracts from its utility. • Continued effort is needed between the Special Education and ESOL/HILT Departments to understand each other’s processes. • Parents and staff identified concerns regarding the consideration of ELLs’ language needs when providing and planning services for their special need services. • There is a perception that students with an IEP educated in self-contained settings are the least likely to also receive ELL services. • Finding qualified individuals to fill the secondary level dually certified teacher positions has been challenging. • Staff expressed the need for more targeted professional development.
Support for Teaching & Learning for Students with Special Needs	<ul style="list-style-type: none"> • Student Services has an impressive system in place to support students and their families, including staff who support students with substance abuse, students and their families who are homeless, etc. • APS personnel to student ratios are smaller than the average ratios of all surveyed districts (except for 	<ul style="list-style-type: none"> • The current organizational and reporting structure for supervisors makes it very difficult to produce effective staff evaluations of school-based related services providers. • The small number of special education coordinators means limited time at each school site. Time is spent addressing compliance issues instead of

SUMMARY OF STRENGTHS AND OPPORTUNITIES FOR IMPROVEMENT

Section	Strengths	Opportunities for Improvement
	<p>psychologists).¹⁵</p> <ul style="list-style-type: none"> The use of the Arlington County Department of Health Services nurses provides APS with valuable and immediate resources to promote student health and wellness. The Special Education website has specific procedures written in the form of parent brochures to guide the coordination of students with an IEP who are transferring to a new grade level school. Senior leadership level communication between Transportation and Student Services appears solid. APS has several task forces and committees led by key Student Services staff. APS has formed an exceptionally strong relationship with parents. The Parent Resource Center offers an invaluable service to parents who are seeking guidance or support in navigating special education policies and procedures. 	<p>providing active and meaningful support to schools.</p> <ul style="list-style-type: none"> Two Pupil Services personnel share administrative oversight for Section 504, including attending routine Section 504 meetings, in addition to other non-Section 504 functions. Other school districts expect school-based staff to perform these duties. Communication between schools and the nurses is not always fluid. School Test Coordinators (STCs) do not have access to the electronic IEP system to easily identify accommodations.¹⁶ A more systemic communication process for transition, with standard procedures and activities, would ease student and parent anxieties. There is no centralized system to coordinate transportation between schools and the countywide transportation department. Staff members were unaware of the work being done by the district’s task forces and committees. Many parents have never visited the Parent Resource Center. The Special Education PPIM is not comprehensive, intuitive or up to date. Staff were either not aware of its existence or did not use it as a resource.
<p>Accountability for Expected Practices & Results for Students with Special Needs</p>	<ul style="list-style-type: none"> APS has an impressive mission, vision and core values of diversity, inclusivity, and academic and social/emotional wellness. The APS Strategic Plan has a goal of eliminating the achievement gap and has data for all subgroups of students (including those with disabilities). 	<ul style="list-style-type: none"> A culture shift is needed for more inclusivity. The Strategic Plan lacks this reference even though it is an IDEA required performance indicator for Federal/State monitoring, APS’s outcomes miss state targets and are more restrictive than comparable districts and the nation. APS’s programmatic evaluations do not consistently address the special needs areas as a component of the process.

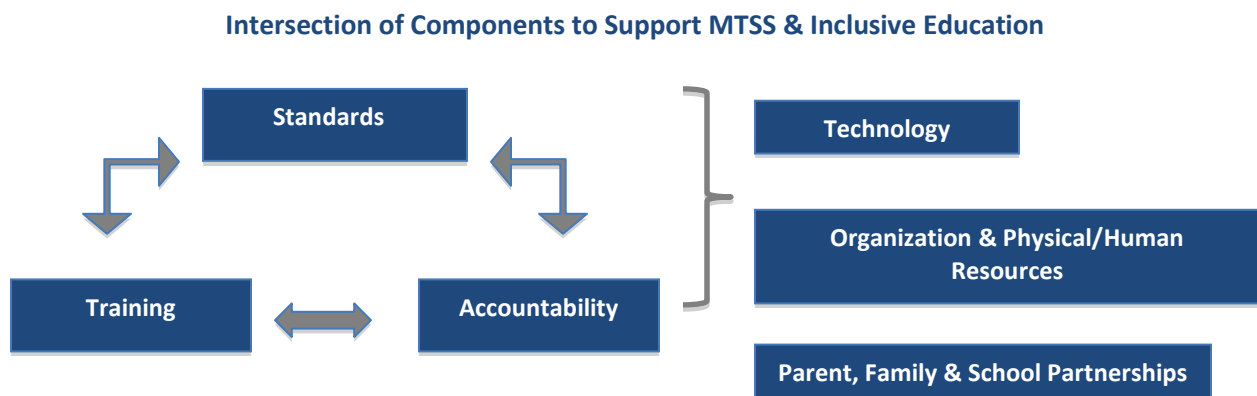
¹⁵ This calculation does not reflect any state caseload or workloads considerations or planning factors, which would be significantly different for each district and would prohibit any meaningful comparison.

¹⁶ APS does not have an electronic system for Section 504 plans.

Priority Recommendations

The recommendations below reflect the six high priority areas for implementation relating to PCG's evaluation of APS services for students with special needs.¹⁷ These six areas pertain to: a multi-tiered system of supports (MTSS), inclusive education, organizational structure and collaboration, operating standards, accountability, and parent, family and school partnerships.

When planning implementation activities, ensure there is an alignment between standards for expected MTSS and inclusive education practices with training and accountability measures. In other words, ensure that all standards are linked to training and accountability; that all training provisions are linked to standards and accountability; and that all accountability measures are linked to standards and training. Support these components with: technology; an effective organization and physical/human resources; and parent, family and school partnerships. The schema below shows the intersection of these components.



The six recommendations are summarized below. Detailed information to support planning and implementation activities for each of the recommendations is provided at the end of this report.

- 1. Multi-tiered System of Supports (MTSS).** Expand on the current IAT process to make it more reflective of a comprehensive and research-based MTSS framework to ensure all students receive the instruction and interventions they need to support academic and social/emotional learning, and to achieve at a higher level of performance.¹⁸
- 2. Inclusive Education.** Actualize APS's vision as a diverse and *inclusive school community*, committed to academic excellence and integrity, by maximizing inclusive and effective instruction, intervention and support for all students, including those with special and dual needs. These students include those who are ELLs and/or receive support through MTSS, a Section 504 plan, and/or an IEP. Lay a foundation for this work by expanding the district's courageous conversations involving race and

¹⁷ For the purposes of this report, students with special needs refer to students involved with MTSS, with Section 504 plans and/or Individualized Education Plans (IEPs). Students with disabilities refer to students with Section 504 plans and IEPs. Special education refers to the provision of services under the Individuals with Disabilities Education Act (IDEA) and the receipt of special education/related services through an IEP.

¹⁸ 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.

ethnicity to include students with disabilities. Have conversations with stakeholders and school board members about the district's current configuration of services for students with disabilities, their performance over time, and the district's fortitude to embark on a journey to provide services in a more inclusive manner. APS will in turn become known as a leader in the state and nation for improved outcomes for students with special needs.

3. Organization & Collaboration. Maximize collaboration between personnel in the Departments of Instruction and Student Services and within Student Services to facilitate the coordination of all APS resources to support teaching and learning. To accomplish this goal:

- **Instruction & Student Services.** Have the Assistant Superintendents for Instruction and Student Services establish a structure for communication, planning, implementation of activities, and sharing website links.
- **Student Services & ESOL/HILT.** Have Student Services and ESOL/HILT personnel engage in consistent and collaborative planning for highly effective instruction/support and professional learning activities, and cross-train staff who support school instructional practices.
- **Student Services.** Organize Student Services in a manner that maximizes support to schools for effective inclusive education practices. Develop a comprehensive implementation plan, which includes professional learning for Student Services and school personnel, to facilitate a well-managed transition.

4. Operating Standards. Produce electronic Standard Operating Procedure Manuals (SOPM) to post policies, procedures and expected practices for MTSS, Section 504 and special education/related services with links to additional information and resources. Include expectations for ELLs regarding their identification and provision of services that are culturally and linguistically appropriate. Post the SOPMs on various pages of APS's website to maximize their accessibility to APS personnel and the community. Support implementation of MTSS and Section 504 through new electronic record systems, and enhance APS's IEP system with a few modifications. In coordination with professional learning activities referenced in Recommendations 1 through 3 above, plan differentiated training for stakeholders, including parents, regarding the SOPMs and new/modified electronic record systems.

5. Accountability. Establish a system of accountability that reflects APS's vision of high expectations for all learners and a service delivery model that is proactive rather than reactive – and inclusive in nature.

- **Advisory Committees.** Establish a principle of universal design for every curriculum-based/focused advisory committee whereby participants and recommendations are expected to address all students, including students with special needs and students who are also ELLs.
- **APS Strategic Plan.** Incorporate components relevant to MTSS, Section 504 and special education/related services in the APS Strategic Plan.
- **School Improvement Plans.** Based on a common template, have schools include in their school improvement plans aggressive implementation activities for MTSS and inclusive education practices based on APS's SOPM.
- **Monitoring.** Develop user-friendly reports and other standard mechanisms to monitor SOPM implementation and any impact on student growth. Use this information to: modify the SOPM

and related practices; target resources; and support progress.

- **Personnel Accountability.** Hold personnel accountable for expected results through incentives and consequences that encourage fidelity in the implementation of standards.
 - **Programmatic Evaluations.** Incorporate a universal design model for all future programmatic evaluations so that they address relevant issues pertinent to students with special needs, including those who are ELLs.
 - **Data.** Use valid and reliable data to regularly review patterns and trends to monitor SOPM implementation and to inform follow-up action.
6. **Parent, Family & School Partnerships.** To promote strong parent, family and school partnerships: increase parent awareness and use of the Parent Resource Center; develop one-page information guides and use the public television system to enhance parent understanding of the MTSS, Section 504 and inclusive education/special education processes; and increase communication between task forces and stakeholders to enhance their effectiveness.

Introduction

The Arlington Public Schools (APS) contracted with the Public Consulting Group (PCG) to provide a comprehensive assessment of the district's services to students with special needs. The assessment involved an examination of the effectiveness and efficacy of APS policies, procedures and practices concerning: the use of Intervention Assistance Teams (IATs), special education services provided under the Individuals with Disabilities Education Act (IDEA), and supplementary aids and services provided under Section 504 of the Rehabilitation Act (Section 504). The focus of this evaluation is on the overall effectiveness of these programs, and does not review specific types of services within special education.

PCG provided APS with three interim reports to facilitate timely and ongoing communication with district personnel about information as it was gathered and analyzed. Each of these interim reports targeted distinct areas of the evaluation and shared preliminary findings. This final report brings together the many aspects of the review by highlighting strengths, areas for improvement, and making specific recommendations for future action. PCG has collaborated with APS administrators regarding the development of an action plan to guide the implementation of six core recommendations and five additional recommendations that require less action planning to address.

Organization of the Report

This report is organized by seven major themes:

- Section 1. APS Demographics & Academic/Behavior Outcomes
- Section 2. IATs: Administration & Implementation
- Section 3. Section 504: Administration & Implementation
- Section 4. Special Education: Administration & Implementation
- Section 5. ELLs: IAT, Section 504 & Special Education Administration & Implementation
- Section 6. Support for Teaching & Learning for Students with Special Needs
- Section 7. Accountability for Expected Practices & Results for Students with Special Needs

Each of these sections concludes with specific recommendations. Overall recommendations are provided at the end, including six priority recommendations with detailed provisions for implementation. In addition, an explanation of frequently used terms is in Appendix BB and a list of acronyms is in Appendix CC.

Methodology

Qualitative and quantitative data collection procedures were multifaceted, collaborative, and designed to ensure input from multiple stakeholders. Numerous data collection procedures guided the development of this report. Analytical tools included database and spreadsheets to analyze outcomes and the patterns of responses in the survey data. Qualitative thematic analysis methods were used to analyze interview and open-ended survey data. The information on the following pages describes the methods PCG used to gather information relevant to its assessment.

Document Review

Pertinent district documents were examined for information related to district and school structures, programs, policies, and practices. Documents that were reviewed are included below. A complete list of all documents provided by the district is provided in Appendix B.

- Student services organization and roles and responsibilities
- Job descriptions of special education staff (teachers, paraprofessionals, and related services staff)
- District financial data
- District procedural/process manuals and guides
- List of out-of-district placements
- List of assessments used for evaluation and progress monitoring
- Description of professional development options
- Reports prepared by the special education director
- Regulatory documents and technical assistance guides
- ASEAC Reports

Staff, Parent and Student Surveys

An online survey process was implemented to acquire data on staff, student and parent perceptions of special education, IAT and 504 services. A total of nine surveys were distributed to each of the above target demographics. The surveys are provided in Appendices C through I.

Survey Items

Survey items were drawn from the research and practice literature in special education and clustered to acquire data from each of the stakeholder groups regarding the extent to which these groups perceived that policies and practices shown in the literature to support effective programming, parent involvement, and positive results for students with special needs are evident in APS. The district reviewed the survey items to ensure relevance and to add items if appropriate. The survey incorporated 5-point rating scales, yes/no questions and included open-ended text areas.

The Survey Process

The district worked collaboratively with the PCG team to facilitate a survey process that would result in the highest possible rate of return. In order to encourage participation, all potential participants were informed of the purpose of the survey and provided with instructions for accessing the survey online. Students were given class time to complete their surveys.

Focus Groups and Interviews

In April 2012, PCG conducted four days of on-site focus groups and interviews and participated in an ASEAC meeting to gather a wide-range of feedback from APS stakeholder groups. During the time on-site, PCG conducted 33 sessions with key stakeholders including the Superintendent, central office administrators, school staff and parents. PCG asked a wide-range of questions of each group to get an overall picture of services provided to students with IAT, 504, Health Plans and IEPs. In addition, PCG attended an ASEAC Committee meeting where parents shared feedback on their child's experiences

with APS. PCG participated in the sessions by presenting a brief overview of the evaluation. An audio file of the speakers at the Committee meeting was provided to PCG for further analysis. In June 2012, PCG hosted two focus groups with students from Wakefield and Washington-Lee High Schools.

Case Studies

In June 2012, PCG visited APS for three days to conduct case study sessions with coordinators, teachers and parents. A total of 148 student records were reviewed in three different groups and included the following breakdown: 68 general education IEPs, 35 IEPs from students in special programs, 22 IATs, 17 504 plans and six health plans. Student records were selected based on a careful methodology laid out by PCG to ensure a breadth of students across disability category and race code.

This was the first time APS and PCG attempted this kind of approach of reviewing records. Since most traditional file reviews focus on compliance and the district does well in that area, PCG worked closely with APS staff to design an alternative approach to go beyond the typical compliance review and to look at student records and their student's performance in school. PCG conducted focus-group style reviews with a variety of student documents from eligibility forms to IEP records to student progress reports. All documents were gathered by APS staff and redacted to ensure anonymity of the student. The focus groups were made up of staff that did and did not have direct knowledge of a particular student. Staff members from each school represented a certain student file and were able to talk about their student's progress and receive advice from peers from other schools. A parent participant, acting in the official capacity of an evaluation team member, attended each session to provide the parent perspective. A note taker from PCG was on-hand to record answers to key questions asked by the facilitator and ensure that all areas of a student's cumulative folder were reviewed. See Appendix J for documents associated with the case study process.

Overall, PCG received positive feedback from key stakeholders involved and many said that the process provided a helpful way of looking at student files. Several suggestions were that could be employed to review records in a different way in the future. If APS were to continue with the case study process as designed with PCG, staff recommended reviewing fewer cases and allocating more time to review each case. Instead of redacting all student information, a very labor-intensive process, APS could get permission to use specific student records and have all parties involved sign a confidentiality agreement. Other suggestions about how to use this case study method moving forward included:

- Having cross-program case studies, e.g., including teachers from various programs and schools;
- Having coordinators lead reviews for tough cases at their own schools;
- Conducting refresher trainings using case studies as a professional development opportunity; and
- Having the Parent Resource Center (PRC) lead case study sessions with hypothetical students to help parents understand the special education process.

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 K.

Section 1. APS Demographics & Academic/Behavior Outcomes

APS provided PCG with a multitude of data files that contained information relevant to students identified as having IAT services, IEPs, and Section 504 plans.¹⁹ These data elements and other public sources were used to prepare detailed tables, charts, and analysis pertaining to demographics of the three groups of students: IAT, Section 504 and IEP. These groups were further analyzed by race/ethnicity, gender, social economic status, and gifted status. In addition, data elements were analyzed for student attendance, student achievement, graduation, and dropout rates.²⁰

Student Demographic Data

The exhibits below reflect student demographic data from the 2010-2011 school year, separated by a variety of demographic groups for the APS pre-kindergarten to grade 12+ enrolled student population, and by students with IEPs, IATs, and Section 504 plans. See Appendix L for a table with more detailed data.²¹

By APS Disability (IDEA) & Comparison School Districts

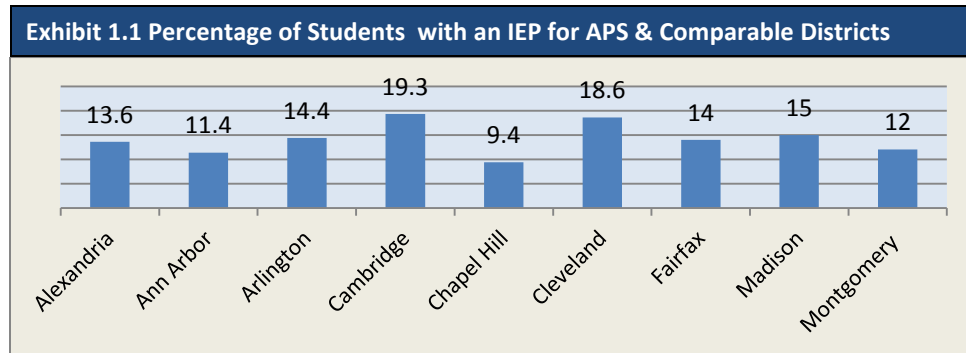
Exhibit 1.1 shows IDEA data for the reviewed school systems. Of those analyzed, APS has the highest percentage of students with an IEP (14.4%) in comparison with other Washington Area Boards of Education (WABE) districts. Although APS is the highest, both Alexandria and Fairfax are within one percentage point of APS, at 13.6% and 14.0% respectively. When compared with similar districts from outside of the WABE cohort, APS fell in the middle and the range of percentages was more varied.²²

¹⁹ End of Year data files (2007, 2008, 2009, 2010, 2011); December 1 Count data file (2011); IAT data files (2007, 2008, 2009, 2010, 2011); and Section 504 data files (2007, 2008, 2009, 2010, 2011).

²⁰ For all tables and displays, PCG omitted raw numbers 7 or less so the data would not be identifiable.

²¹ The Appendix L table is revised from the first draft interim report. Information about the revision is provided in the Appendix. Data provided by APS (EOY 2011.xlsx and IAT 2010-11.xls).

²² At the request of APS, PCG chose several other districts that were part of the Minority Student Achievement Network (MSAN) as comparison districts. These schools included Ann Arbor, MI; Alexandria, VA; Chapel Hill-Carrboro, NC; Cambridge, MA; Cleveland Heights, OH; and Madison, WI. According to its website, "MSAN is a national coalition of 25 multiracial, suburban-urban school districts that have come together to study and eliminate achievement gaps that exist in their districts. MSAN districts have student populations between 3,000 and 33,000, and are most often well-established first-ring suburbs or small/mid-size cities. Additionally, the districts share a history of high academic achievement, connections to major research universities, and resources that generally exceed neighboring districts." Sources: FY 2012 WABE Guide, 2012 Maryland Report Card, <http://www.ode.state.oh.us/reportcardfiles/2010-2011/DIST/043794.pdf>, <https://www.mischooldata.org/DistrictSchoolProfiles/StudentInformation/StudentCount.aspx>, http://www3.cpsd.us/media/network/10516/media/CPS%20Redesign/documents/SpecialEducation/Highlights/Statistical_Report_3_2012.pdf?rev=0, <http://ec.ncpublicschools.gov/reports-data/child-count/reports/december-1>, <http://www.ode.state.oh.us/reportcardfiles/2010-2011/DIST/043794.pdf>, <https://infosvcweb.madison.k12.wi.us/node/976>.



Based on responses from 50 urban school districts to a survey conducted by the Urban Special Education Leadership, and supplemented by information from six districts reviewed by the Council of Great City Schools, the average percentage of students receiving special education services is 12.3%, which is 2.1 percentage points below APS's rate of 14.4%.^{23,24} The surveyed districts IEP rates ranged from 8% to 25%. Appendix M provides a list showing for each district: the total school enrollment and the number/percentage of students with disabilities. In addition, the Appendix shows the percentages in rank order from low to high.

By Primary Disability

As reflected in Exhibit 1.2 on the following page, APS's percentages of special education students by disability area are close to those at the national level, with a few exceptions:²⁵

- **Specific Learning Disability (SLD).** The largest proportion of APS and U.S. students identified with a disability are identified as having a specific learning disability (SLD), 33% and 37%, respectively.
- **Other Health Impairment (OHI).** APS's next largest disability category is for students with other health impairments (OHI), which at 20% is substantially higher than the national rate of 11%.²⁶ Additional discussion about this issue is provided below.
- **Speech/Language (S/L).** In the disability category of speech/language (SL), APS's percentage of 14% is smaller than the national rate of 22%.
- **Autism.** In the disability category of autism, APS's rate (11%) is almost twice the national rate of 6%.
- **Intellectual Disability (ID).** For students with an intellectual disability (ID), APS's rate of 3% is smaller than the national rate of 7%.
- **Emotional/Behavioral Disability (ED).** APS's rate of students with ED (3%) is less than half of the national rate of 7%.
- **Developmental Delay (DD).** APS and the nation have 6% of students with an IEP identified as DD.
- **Multiple Disabilities & Other.** APS's rate for multiple disabilities and all other disability areas similar to national rates: 3% to 2%, and 2% to 3%, respectively.

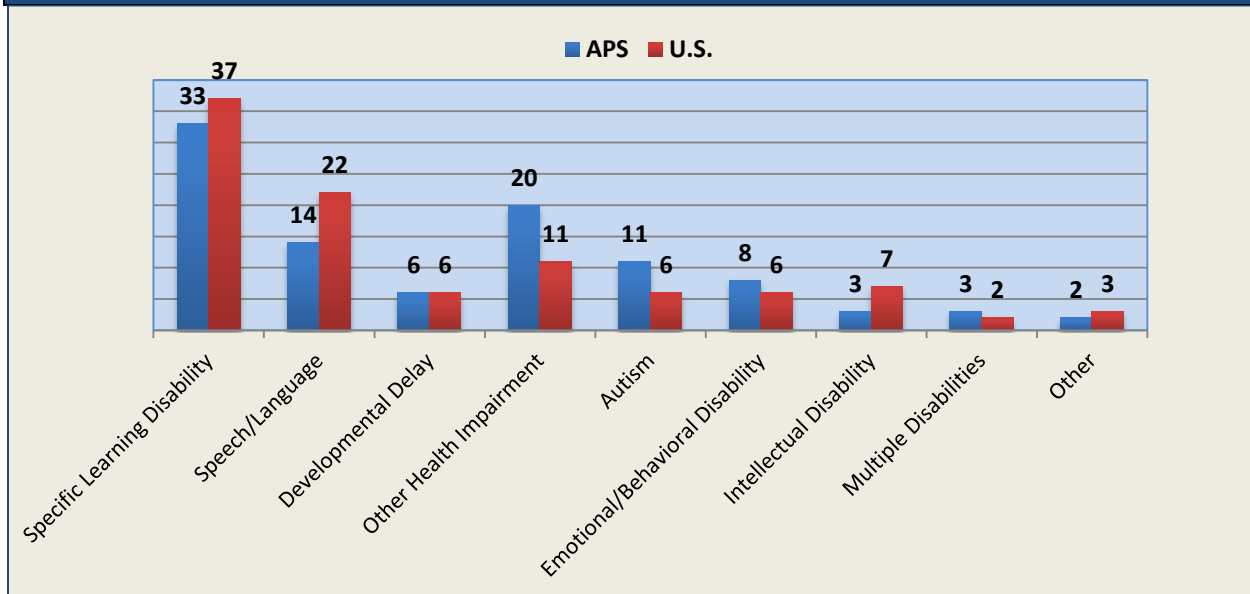
²³ The Urban Special Education Collaborative is a membership organization of almost 100 urban school districts across the country. See the Collaborative's website at <http://www.urbancollaborative.org/membership> and see Appendix M for the results of the survey.

²⁴ Percentages may vary slightly based on data source or reporting year.

²⁵ National data provided by the Data Accountability Center, Table 1-3. Number of students ages 6 through 21 served under IDEA, Part B, by disability category and state: Fall 2010 http://www.ideadata.org/arc_toc12.asp#partbCC.

²⁶ The area of ADHD is specifically included in the IDEA's definition of OHI.

Exhibit 1.2. Percent of Students with Disabilities by Disability Area for APS & U.S. (2010-11)



Other Health Impairment & ADHD

During the 1997 IDEA reauthorization process, advocacy to add ADHD as a separate disability area was rejected; instead, ADHD was added to the OHI definition. Neither the U.S. Department of Education nor the Virginia Department of Education requires school districts to collect data regarding the number of students with OHI due to ADHD; APS does not collect this information either. Although data is not available to indicate APS's percentage of OHI students with ADHD, PCG suspects the large rate (20%) of OHI students in APS, compared to national rate of 11%, may be reflective of how the district offers support services to students with ADHD.

APS has a low usage of Section 504 to address students with ADHD. APS's prior 2008 guidance for Section 504, which was reviewed by PCG, indicated that IDEA is a better approach for addressing student impairments involving learning, reading or thinking.²⁷ However, as PCG wrote in *Interim Report #1*, Section 504 covers students with ADHD (and other disabilities) who do not require special education services but do require supplemental aids/services to support learning. APS's guidance was subsequently revised to reflect this information.

Disability Trends Over The Past Five Years

Appendix O presents the percentages of students by disability area over the past five years. Since the 2006-2007 school year, there has been little percentage change within the disability areas; however, the percentage of students identified as Developmentally Delayed has seen the largest decrease (11% in 2007 to 5% in 2011). This decrease is best explained by the change in definition of DD. The maximum age at which a student may be classified as DD decreased from age 9 to age 6 in 2007. The percentage of

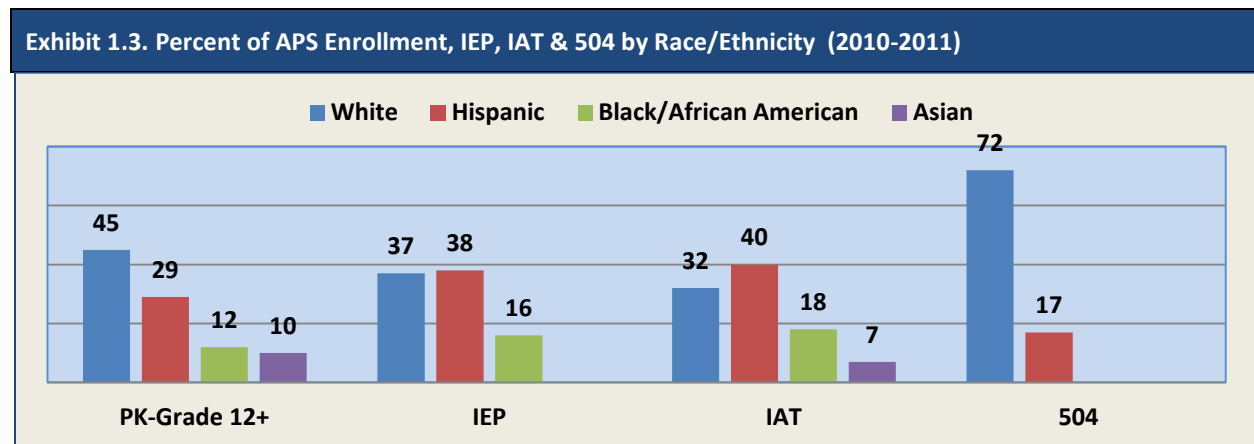
²⁷ See Appendix X for PCG's full review of APS's Section 504 guidelines.

students in the Other Disability Groups category increased substantially: from 8% in 2006 to 13% in 2011.²⁸

By Race/Ethnicity

Exhibit 1.3 below reflects the percentage of APS enrollment as separated by race/ethnicity, IEP, IAT and 504 plans.

- **IEPs.** For students with an IEP, the percentage of white students is disproportionately smaller (37%) than the enrolled percentage of white students in APS (45%). The percentage of Hispanic students is disproportionately higher (38%) than the APS enrollment rate of Hispanic students (29%), as is the percentage of Black/African American students (16% to 12%). The percentage of students with an IEP having a multiple race is similar to their APS population percentage. It is important to note that APS has not been found by the Virginia Department of Education to have policies, procedures, or practices that have resulted in any inappropriate identification of students by race or ethnicity.
- **IATs.** In the area of IATs, white and Asian American students are also underrepresented compared to their APS population (32% to 45%, and 7% to 10%, respectively). Hispanic and Black/African American students are overrepresented (40% to 29% and 18% to 12%, respectively).
- **504s.** Of all students with Section 504 plans, 72% were white and 17% were Hispanic.²⁹



Compared to APS's total student enrollment, and the proportion of each racial/ethnic student population, the most significant disproportionality exists in the following areas:

- **Section 504.** White students are overrepresented, Black/African American and Asian American students are significantly underrepresented, and Hispanic students are underrepresented to a smaller extent.
- **IEPs.** Hispanic students are overrepresented to a small degree, and Asian American students are significantly underrepresented.

²⁸ The disabilities classified in the Other Disabilities Groups classification include Deaf-Blindness, Hearing Impairment, Intellectual Disabilities (2010 and 2011 only), Multiple Disabilities, Mental Retardation, Orthopedic Impairment, Severe Disability, Traumatic Brain Injury, Visual Impairment, and Section 504 (2010 and 2011 only).

²⁹ "Race Other," which includes students classified with a race of American Indian/Alaska Native and Native Hawaiian/Other Pacific Islander, was not included in the Exhibit because of the small numbers. Also, for all tables and displays, PCG omitted raw numbers 7 or less so the data would not be identifiable.

Disability by Race/Ethnicity Over The Past Five Years

Appendix P displays the distribution of students by race/ethnicity and disability area from the 2010-2011 school year. Approximately 40% of all Black/African American and Hispanic students with a disability are identified as having an SLD compared to only 20% of white students. White students with a disability are more likely to be 504 qualified than students of other ethnicities. Autism is most prevalent for white and Asian American students, and ED is more prevalent for Black/African American students.

By School

Appendix Q reflects detailed data regarding the distribution of students with IEPs, IATs, and 504 plans for the 2010-2011 school year. These data elements show the following:

- **IEPs.** The highest percentage of students with an IEP were enrolled in the following schools: Randolph Elementary (27%), Barrett Elementary (26%), Long Branch Elementary (26%), Kenmore Middle School (23%), Wakefield High School (18%) and in an Other Programs/Contract Service Setting (56.8%). Overall, the percentage of students with an IEP at the high school level (14%) was smaller than at the elementary (16%) or middle school (16%) levels. Thus, the percentage of students with an IEP may increase in the future as these younger students move through APS's grade levels and enter high school.
- **IATs.** For the area of IATs, the percentage of students involved with this process ranges from a high of 6% (Claremont Immersion) to two schools with a number that is too small to report (Arlington Traditional and Glebe Elementary).
- **504 Plans.** The following schools enrolled the highest percentages of students with a 504 plan: Claremont Immersion (6%), Gunston Middle School (3%), and Washington-Lee (3%).³⁰

By Grade

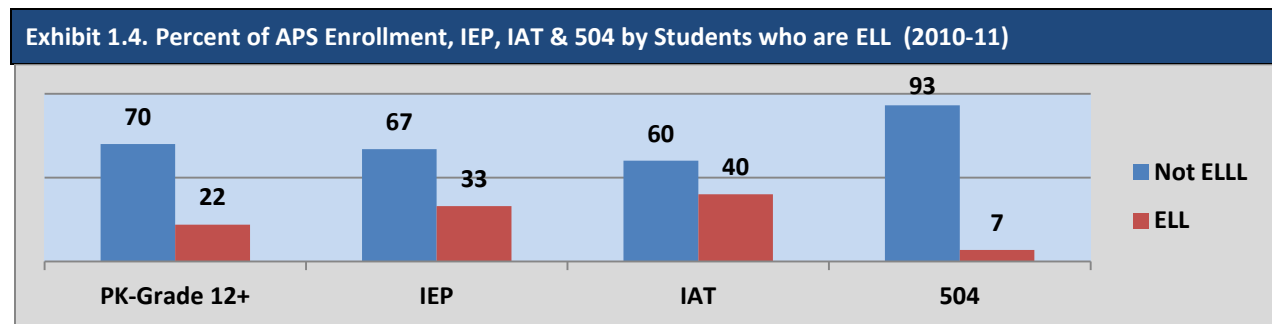
Appendix R reflects data by student grade level from the 2010-2011 school year. This data reflects the following:

- **IEPs.** The highest percentage of students with an IEP are in Pre-Kindergarten (32%) whereas the lowest percentage of students with an IEP are listed in grade Kindergarten (11%).
- **IATs.** There is also a higher concentration of students with IAT plans in grades 2 (4%) and 3 (4%) with the lowest in grade 12 (1%) and students in an Other Programs/Contract Services Setting (1%). This concentration is typical of what is seen in most districts in the nascent stages because existing support material and resources for targeted intervention programs for general education students tend to be most readily available in the early grades.
- **504 Plans.** Overall, about 1% of APS students have 504 plans, and this proportion is fairly consistent across the grades, generally ranging from under 1% to 1%. Interestingly, the sole exception is for the 12th grade (2%).

³⁰ Data provided by APS in the spreadsheets labeled: EOY 2011.xlsx and IAT 2010-11.xls

English Language Learners (ELL)

As reflected in Exhibit 1.4, a disproportionately higher percentage of students with an IEP (33%) and IATs (40%) are ELL, compared to their enrollment rate in APS (22%). A much smaller percentage of students with 504 plans are ELL compared to their APS enrollment (7% to 22%). Of the 720 ELL students with an IEP, 64% of them receive ESOL/HILT services, 24% of them had services declined and 12% are former ELL students.³¹ Of the 79 ELL students with 504 plans, 79% of them receive ESOL/HILT services, 11% had services declined and 10% are former ELL students. Although the overrepresentation of ELL students in the area of IEP is not significant, the overrepresentation is more significant in the area of IAT. Furthermore, the underrepresentation of ELL students in the area of Section 504 is significant.



APS & Comparable Districts

As reflected in Exhibit 1.5 below, APS has the second highest ESOL enrollment (17.6%), as a percentage of total enrollments compared to the other districts. Alexandria City has the highest and Fairfax County has the lowest (22.3% and 12.9%, respectively).

Exhibit 1.5 FY 2011, ESOL Students Enrollment (FY 2012 WABE Guide)

	ESOL Enrollment	Percentage of Total Enrollment
Alexandria City, VA	2,672	22.3%
Arlington County, VA	3,743	17.6%
Fairfax County, VA	22,650	12.9%
Montgomery County, MD	18,735	13.0%

Gender

As reflected in Exhibit 1.6 on the following page, the proportion of all APS students is fairly balanced by gender (48% male and 52% female). However, the percentage of all students with an IEP is more than twice as high for males (69%) than for females (31%). Also, a higher percentage of males (60%) have an IAT compared to females (40%), but the difference is less marked than for IEPs. Comparable percentages of males (52%) and females (48%) have Section 504 plans.

³¹ ESOL/HILT stands for English for Speakers of Other Languages/High Intensity Language Training.

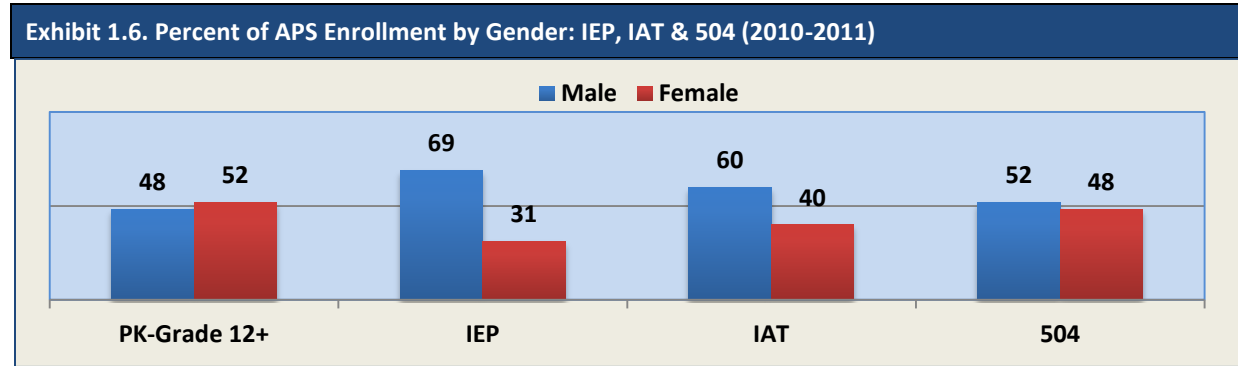
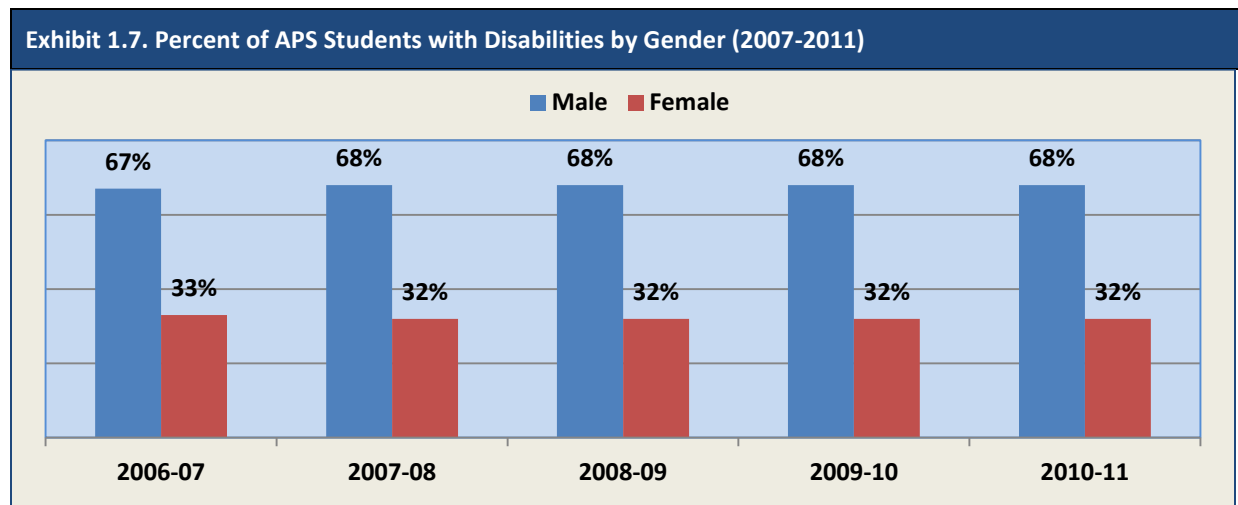


Exhibit 1.7 shows a breakdown of students with a disability by gender. Starting with the 2006-2007 school year, the gender breakdown of these students has stayed relatively consistent: on average 68% are male whereas only 32% are female.³² According to the 2011-12 population data shown in Exhibit 1.8, there are slightly more males in the district than females in the total student body. While this number represents an overrepresentation of males receiving special education services in this district, this gap is consistent with national trends.³³



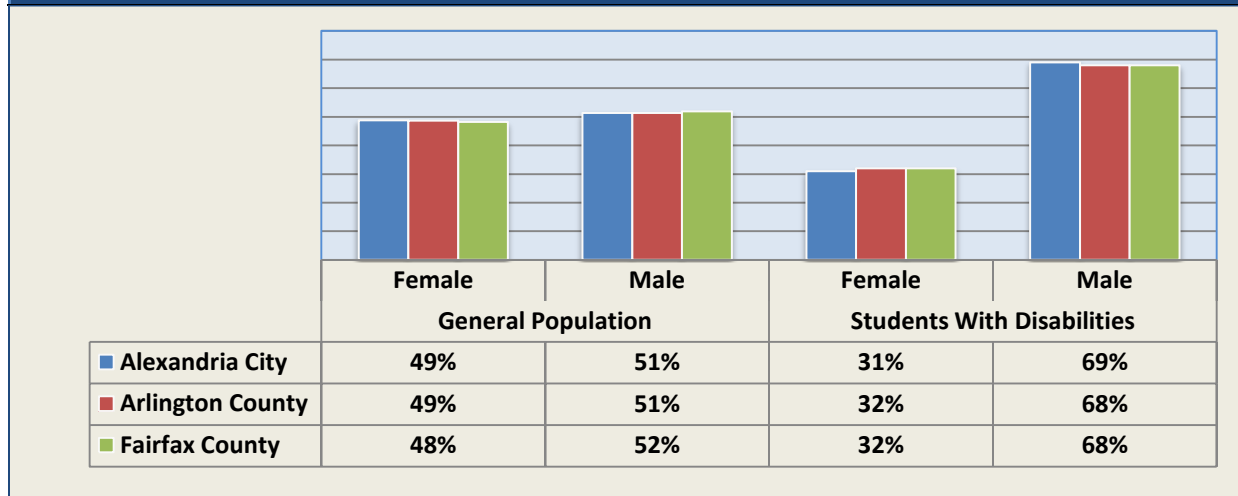
APS & Comparable Districts

Comparable districts show a similar breakdown with respect to gender. They demonstrate the same trend, where over two-thirds of the special education population is male. As noted above, this also follows a national trend in special education.

³² Data provided by APS in the spreadsheets labeled: EOY 2011.xlsx, EOY 2010.xlsx, EOY 2009.xlsx, EOY 2008.xlsx, EOY 2007.xlsx.

³³ Nationally, approximately two-thirds of children receiving special education services are males.

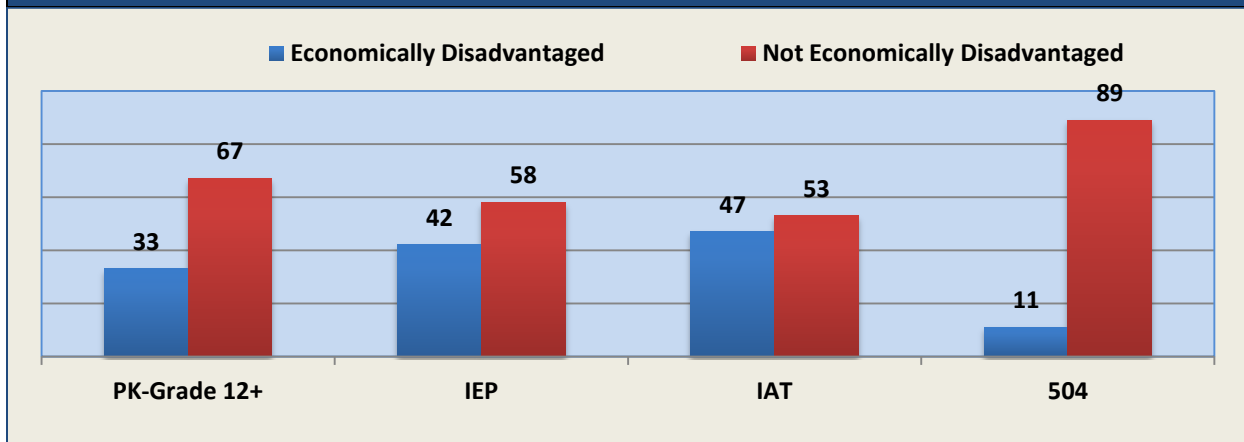
Exhibit 1.8. 2011-12, Population by Gender ³⁴



Economically Disadvantaged

When analyzing data by students’ economically disadvantaged status, a higher percentage of students with an IEP have this status compared to their APS enrollment (42% to 33%), as is true for students involved with the IAT process (47% to 33%). A smaller percentage of students with 504 plans have a status of economically disadvantaged compared to their APS enrollment (11% to 33%).

Exhibit 1.9. Percent of APS Enrollment, IEP, IAT & 504 by Economic Disadvantaged Status by (2010-11)



Gifted Status

Overall, 19.1% of all students at APS are identified as Gifted. Gifted students are underrepresented in the areas of IEPs (6%) and IATs (8%). Conversely, they are somewhat overrepresented in the area of Section 504 (25%).

³⁴ Source: VA DOE Website. Montgomery County, MD was removed from this table because the data was unavailable.

Attendance

Attendance patterns are an important predictor of student success. Overall, student attendance at APS is strong. Appendix S shows absence patterns for the 2010-2011 school year by primary disability. The following are highlights of this data:

- Students classified with a primary disability of ED missed the highest percentage of 16 or more school days across grades PK-12+:
 - **Grades PK-5:** 45% of students with ED compared to 9% of all APS students;
 - **Grades 6-8:** 32% of students with ED compared to 6% of nondisabled peers; and
 - **Grades 9-12:** 28% of students with ED compared to 16% of nondisabled peers.
- Students classified with a primary disability of autism missed the highest percentage of 16 or more school days in middle and high school whereas students with OHI and SLD missed the highest percentage of school days in grades PK-5.
- Students in an Other Programs/Contract Services setting overall missed the fewest number of school days.³⁵

Student Achievement Trends

Student performance on the Virginia Standards of Learning (SOL) assessment is another key indicator for success. Data analysis conducted by PCG shows passage rates in 2010-11 compared to 2008-09 for reading and math for students with and without disabilities.³⁶

Grade 3

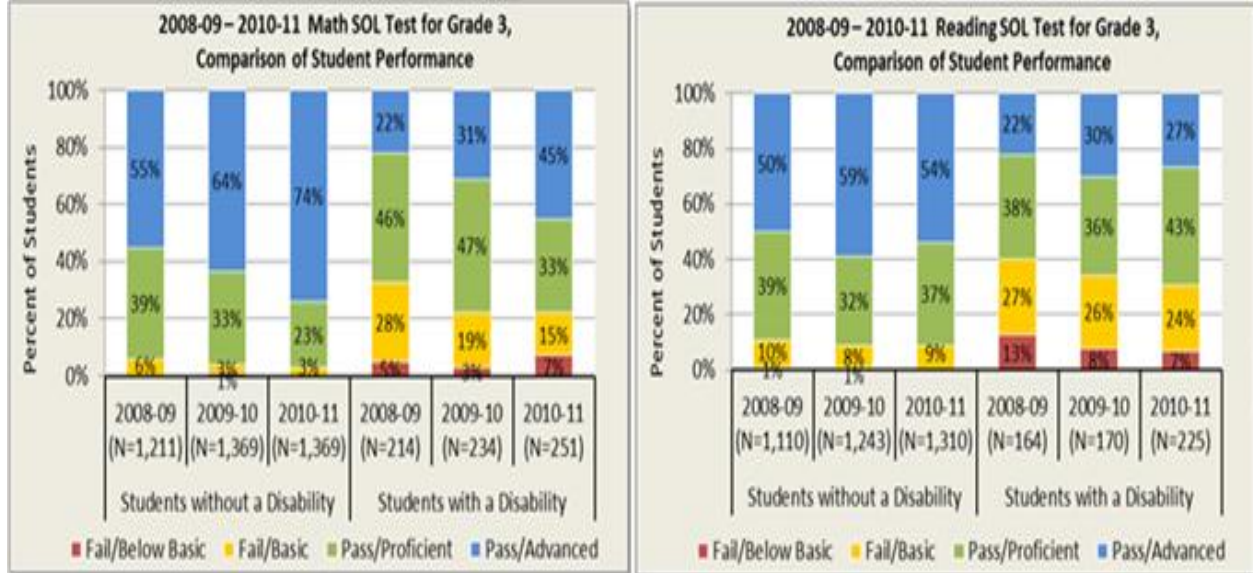
For students participating in Math and Reading SOL in third grade, a larger percentage of students with disabilities passed in 2010-11 than in 2008-09.

- **Reading:** The pass rate of students with disabilities increased by 10 percentage points to 70%, decreasing the achievement gap with nondisabled peers whose pass rate increased by 2 points to 91%.
- **Math:** The pass rate of students with disabilities increased by 10 percentage points to 78%, decreasing the achievement gap with nondisabled peers whose pass rate increased by 3 points to 97%.

³⁵ Data provided by APS in the spreadsheets labeled: EOY 2011.xlsx.

³⁶ Data provided by APS in the spreadsheets labeled: 2008-09 through 2010-11 Spring, Summer and Fall non-writing SOL files and 2008-09 through 2010-11 EOY files. Tests (especially for upper grades) were EOC grades, so students might have more than one score for the year for a given test name/subject. Tests were aggregated into subject and the most recent assessment by subject was determined for tests date fall through summer.

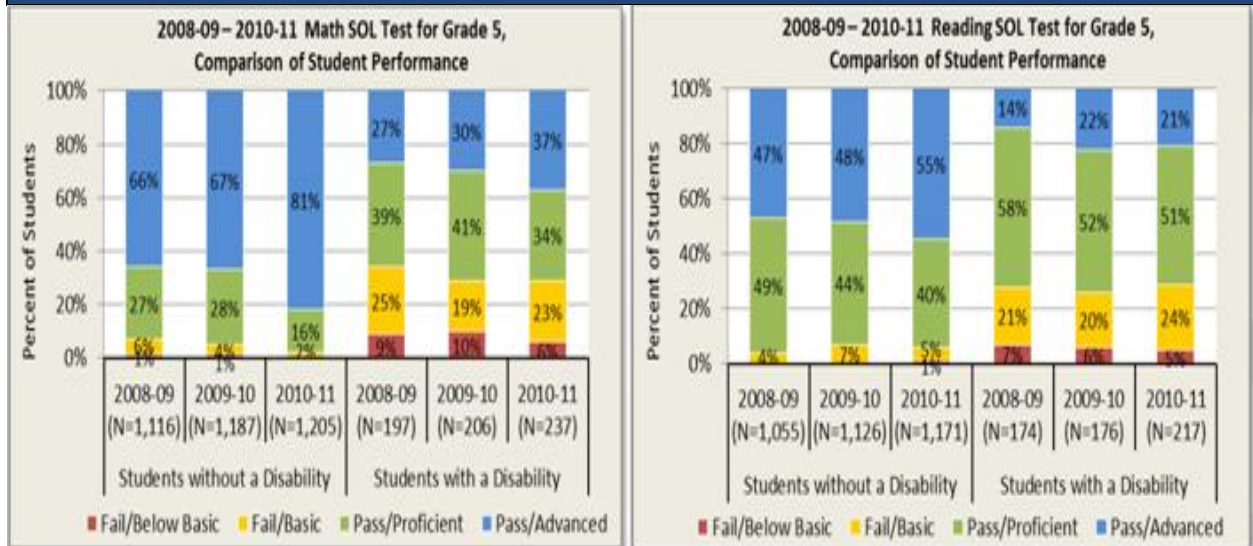
Exhibit 1.10. Grade 3 Math & Reading SOL by Students Without/With Disabilities



Grade 5

- **Reading:** The pass rate of students with disabilities remained the same (72%), and the pass rate of nondisabled peers dropped 1 percentage point to 95%.
- **Math:** The pass rate of students with disabilities increased by 5 percentage points to 71%, decreasing their achievement gap with nondisabled peers whose pass rate increased 4 points to 97%.

Exhibit 1.11. Grade 5 Math & Reading SOL by Students Without/With Disabilities

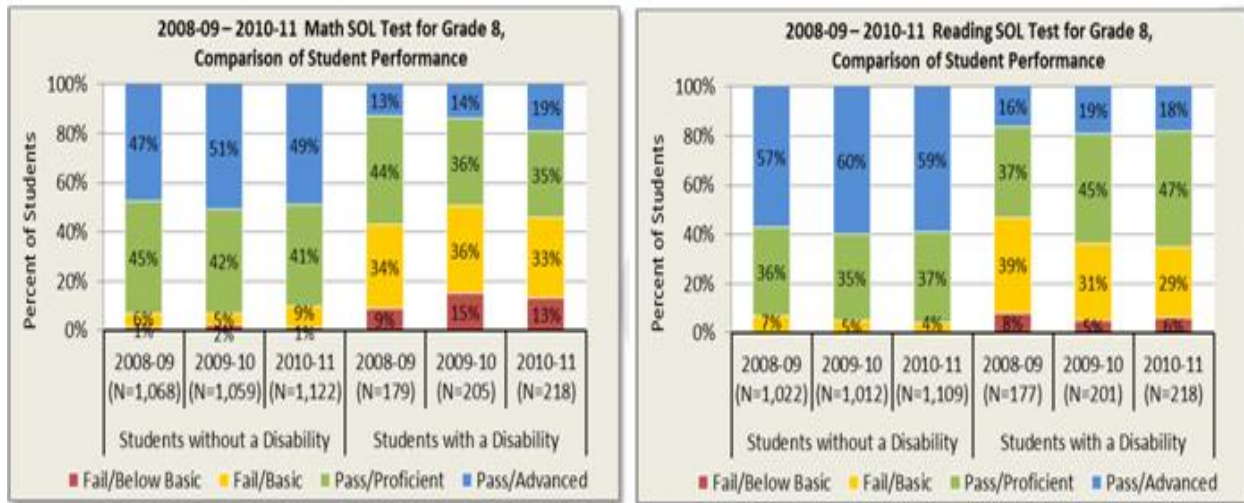


Grade 8

- **Reading:** The pass rate for students with disabilities increased 12 percentage points to 65%, while their nondisabled peers increased their pass rate 3 percentage points to 96%.

- **Math:** The pass rates of students with disabilities decreased 3 percentage points to 54%, while the pass rate for nondisabled peers fell by 2 points to 90%.

Exhibit 1.12. Grade 8 Math & Reading SOL by Students Without/With Disabilities



Over the three grade levels reviewed, the percentage of students with disabilities who scored Pass/Advanced on both Math and Reading SOLs decreased between third and eighth grade. For students with disabilities in third grade, students scored Pass/Advanced at a rate of 45% in Math and 27% in Reading. Students with disabilities in eighth grade scored Pass/Advanced at a rate of only 19% in Math and 18% in Reading.

Graduation & Dropout Rates

The Virginia Department of Education’s Special Education State Performance Plan (SPP) has measures and targets for rates related to: Graduation from high school with a regular diploma and Dropout.

Graduation Rates

The most recent SPP data for the 2010-2011 school year show that APS’s graduation rate for students with an IEP was 54.4%, which exceeded the state target of 52.75%. Fairfax had the highest IEP graduation rate of 65.03%. When considering comparable Virginia school districts, APS falls above the state target and between the rates of comparable districts. Data for Montgomery County, MD was omitted because of that state’s differing graduation standards.

Exhibit 1.13. Special Education Graduation Rate (2010-2011) ³⁷	
Division Performance	
Alexandria City	35.25%
Arlington County	54.40%
Fairfax County	65.03%
VA State Target	52.76%

³⁷ Sources: Virginia DOE Special Education Performance Reports for Alexandria City, Arlington County, and Fairfax County; 2012 Maryland Report Card.

Dropout Rates

SPP data for the 2010-2011 school year show that APS's dropout rate for students with an IEP was 2.02%, which exceeded the state average of 1.53% but was below the state target of 2.25%.³⁸

Opportunities for Improvement

The following summarizes demographic and performance data that present opportunities for improvement:

- **Overall Prevalence.** For students with an IEP, APS has a higher percentage (14.4%) in comparison with the other WABE districts, but it was in the mid-range compared to similar school districts from outside of the WABE cohort. The percentages of students by disability area are about the same as those at the national level, with some exceptions. Areas in which APS rates are higher than the nation's are: 20% with OHI (11% nationally) and 11% autism (6% nationally). Areas in which the rates are smaller than the nation's are: 14% speech/language (22% nationally); 3% intellectual disability (7% nationally); 3% emotional/behavior disability (7% nationally). (Exhibit 1.2) APS has a much smaller percentage of students documented as being involved with the IAT process (2%) and Section 504 (1%) than students receiving special education services. National data is not available for these areas.
- **Race/Ethnicity.** Compared to APS's overall race/ethnicity proportions for total enrollment, the most significant disproportionalities exist in the following areas: for the Section 504 area, white students are overrepresented, Black/African American and Asian American students are significantly underrepresented, and Hispanic students are underrepresented to a smaller degree; for the area of IEPs, Hispanic students are overrepresented to a small degree and Asian American students are significantly underrepresented. Racial/ethnic representation is comparable for students with an IEP. (Exhibit 1.3)
- **Economically Disadvantaged.** Compared to APS's 33% enrollment rate for economically disadvantaged students, this group is represented at a higher rate in the area of IEPs (42%) and IATs (47%) and at a smaller rate for Section 504 (11%). (Exhibit 1.9)
- **Gifted.** Compared to APS's 19.1% rate for gifted students, this group is represented at a lower rate in the areas of IEPs (6%) and IATs (8%), and at a higher rate for the area of Section 504 (25%).
- **Attendance.** Students classified with a primary disability of ED missed the highest percentage of 16 or more school days across grades PK-12+: 45% for elementary school (9% without disabilities); 32% for middle schools (6% without disabilities); and 28% of secondary school (16% without disabilities). Among students classified with a primary disability of autism, middle and high school students the largest number of school days. Students with OHI and SLD missed the highest percentage of school days in grades PK-5. (Appendix S)
- **Performance.** For students participating in Math and Reading SOL at the 3rd, 5th and 8th grades, comparing the 2008-9 and 2010-11 school years, the pass rates of students with disabilities increased in the 3rd grade for reading (10 points to 70%) and math (10 points to 78%); at the 5th grade for math (5 points to 71%); and 8th grade reading (12 points to 65%). The pass rates remained the same for 5th grade reading (72%). Pass rates decreased for 8th grade math (3 points to 54%). Overall, a significant achievement gap remains for students with disabilities compared to their

³⁸ http://www.doe.virginia.gov/special_ed/reports_plans_stats/annual_performance_reports/2010-11.pdf

nondisabled peers who have pass rates at all grades in reading and math at 90% or above. (Exhibits 1.10 – 1.12)

- **Dropout Rates.** The dropout rate was 2.02%. While this exceeded the state average of 1.53%, it was below the state target of 2.25%. (SPP data for the 2010-2011 school year)

In addition, although APS has a rich pool of student performance data that is collected, the following were identified as issues during the evaluation process:

- **Grade K-2 Performance Data.** Data is not centrally collected for students in kindergarten through second grade. This data would be a valuable source for ascertaining the extent to which students are making progress and are on-target for third grade SOL assessment.
- **Secondary Reading/Math Scores.** Reading and math data are not consistently collected beyond the 8th grade. This data is necessary to determine that students (sorted by NCLB subgroups) are continuing to make progress and the extent to which they are career and college ready.
- **Other Performance Data.** Only SOL scores are centralized and analyzed. Other data used by the district is not centrally collected and used, e.g., DRA, PALS, DRP, SRI, Stanford, NAEP, etc.
- **Progress Data.** The Virginia Department of Education's Student Growth Percentile and Data, which includes student specific progress data, is available to schools and teachers to track individual student growth.³⁹ Reportedly, this data source is not utilized by APS at the time of this report's writing.

RECOMMENDATIONS

1. **Review the various data analyses reported by PCG and the issues identified, and use data to regularly review patterns and trends to inform follow-up action.**
 - a. **Data Clarity & Accuracy.** Identify and address concerns around data clarity and determine central data source for all student services metrics. Ensure that all departments know how special education data is captured and classified to avoid potential misrepresentation of data. Develop a process to centrally capture and store K-2 progress data.
 - b. **ADHD Data.** Collect data for the category of ADHD for students with OHI and for students with Section 504 plans and use the data to track prevalence rates, including racial/ethnic composition, performance, and service-related information.
 - c. **Disaggregation of Data.** Develop systems for regular disaggregation of student-level data by special need areas and by disability, race/ethnicity, ELL, economic disadvantage, school, school grade levels, as feasible and appropriate, to inform decision-making for the following issues:
 - 1) **Representation of students** in various special needs and disability areas to identify over/underrepresentation and establish follow-up activities.
 - 2) **Performance data** to identify instructional gaps. Benchmark progress of students with an IEP against their general education peers.

³⁹ http://www.doe.virginia.gov/testing/scoring/student_growth_percentiles/index.shtml

Section 2. IATs: Administration & Implementation

Introduction

The purpose of APS's Intervention Assistance Team (IAT) process is to design intervention strategies to improve student academic performance, behavior. The district introduced the IAT process during the 2005-06 school year. IAT procedures, *Early Intervention for Students with Special Learning Needs: Intervention Assistance Teams (IAT)* are provided in Appendix V in APS's *Procedures for Implementing Regulations Governing Special Education Programs for Children with Disabilities in Arlington, Va.* Written information indicates that IATs exist in all schools and at all grade levels. The Student Services Department has developed a collaborative partnership with the Department of Instruction (e.g. English for Speakers of Other Languages (ESOL) and High Intensity Language Training (HILT) teachers, Office of Minority Achievement, English Language Arts, and Early Childhood) to implement this process.

A large percentage of staff at all grade levels (92%) responding to the IAT survey reported being familiar with the academic and behavior intervention services at their schools.⁴⁰ 92% of staff also reported the perception that parents are encouraged to participate as partners during meetings to discuss their children's IAT needs.⁴¹ 91% of staff respondents indicated that schools effectively respond to the needs/concerns of parents in the IAT process. Surveyed high school students expressed a high rate of agreement with positive statements about their satisfaction with the IAT process, for example: "My teachers are giving me the help I need" (91%); and "My teachers talk with me about my progress in school" (88%); and "I receive the help I need to do well in school" (87%).⁴²

This section assesses the efficacy of the district's IAT process and the extent to which it aligns with Multi-Tiered System of Supports (MTSS). The assessment is based on research pertaining to MTSS, documents provided by APS, and information from interviews, focus groups, surveys, and six IAT case study review sessions.⁴³ Detailed information about the surveys and responses is provided in Appendices C and D.⁴⁴ Additional information about the district's IAT procedures is provided in Appendix W.

APS has not yet adopted an MTSS program, therefore we would not expect to see all of the components described in this section to be currently present in the district.

⁴⁰ Of 2,952 staff members asked to take a survey of the IAT process, 990 (33.5%) responded. Of these respondents, 641 identified themselves as working with students having IAT plans. Not all survey participants responded to each survey question asked. The percentage for each response reflects the number of people who responded to a question, it does not reflect the percentage based on the total number of participants.

⁴¹ Due to low response rate (5.8%) from parents of students with IAT plans, PCG was unable to complete survey analysis in this area. The low response appears to be based on confusion regarding the term "IAT" as each school uses a different term to describe this process.

⁴² Sixty-eight students responded to the IAT survey. Parents were also surveyed but there a sufficient number did not respond to support an analysis of responses that would be meaningful. Reasons for the low response are discussed later in this section.

⁴³ Schools provided 22 IAT-related files for review; however, time permitted for the focused review of 16 of the files.

⁴⁴ Of 2,952 staff members asked to take a survey of the IAT process, 990 (33.5%) responded. Of these respondents, 641 identified themselves as working with students having IAT plans. Of 68 APS high school students with IAT plans, 61% completed an online survey.

Multi-Tiered System of Supports (MTSS)

As initially discussed above, the term Multi-Tiered System of Supports (MTSS) has emerged in literature and practice to describe a comprehensive framework that integrates assessment and intervention in a schoolwide, multi-tiered prevention system to maximize student achievement and reduce behavior problems. MTSS 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 an MTSS framework, students who are excelling may be identified and provided with enriched instruction and activities. Generally, 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.

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 English Language Learners (ELLs) and/or 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.

Multi-level intervention systems include three levels of intensity or prevention. The primary prevention level includes high quality core instruction. The secondary level includes evidence-based intervention(s) of moderate intensity. The tertiary prevention level includes individualized intervention(s) of increased intensity for students who show minimal response to primary and secondary prevention. In addition, intervention intensity increases based on frequency, duration and/or group size. For ELLs and standard-English learners, appropriate instruction and interventions are linguistically and culturally responsive: they consider and build on a student's cultural background and experiences, as well as linguistic proficiency (in both English and native language.) This issue of language proficiency applies to other groups besides ELLs: for example, some students may have had an early childhood home environment and other experiences that provide limited opportunity for oral English language and literacy experiences. As a result, these children are likely to begin school already behind age-appropriate developmental expectations in areas including vocabulary, language development, and phonological skills.

Virginia Requirements & Guidance

In Virginia, the state's *Regulations Governing Special Education Programs for Children with Disabilities* specifies that a student's eligibility for a learning disability may be supported, in part, on a student's lack

of sufficient progress to meet age or Virginia-approved grade-level standards in one or more specified areas when using a process based on the student's "response to scientific, research-based intervention."⁴⁵ Alternatively, school districts may use the more traditional model that is based on a student's significant discrepancy between achievement and intelligence. Virginia uses the Response to Intervention (RtI) common term for MTSS, and in 2007, developed the guideline document, *Responsive Instruction: Refining Our Work of Teaching all Children*.⁴⁶

APS has not used the RtI process to impact SLD eligibility. Based on APS documents, the district has chosen the IAT process to help to eliminate the achievement gap, and to reduce any racial/ethnic disproportionality in the area of special education.⁴⁷

Universal Screening & Referral Process

This section assesses the effectiveness of APS practices regarding the identification of students requiring intervention strategies to improve their academic performance or behavior.

Universal Screening

According to the National Center on RtI, funded by the U.S. Department of Education, "Universal Screening" is defined as screening for all students. The process involves:

Brief assessments that are valid, reliable, and evidence-based... conducted with all students or targeted groups of students to identify students who are at risk of academic failure and, therefore, likely to need additional or alternative forms of instruction to supplement the conventional general education approach. . . . Screening is conducted to identify or predict students who may be at risk for poor learning outcomes. Universal screening tests are typically brief, conducted with all students at a grade level, and followed by additional testing or short-term progress monitoring to corroborate students' risk status. In screening, attention should focus on fidelity of implementation and selection of evidence-based tools, with consideration for cultural and linguistic responsiveness and recognition of student strengths.⁴⁸

APS's IAT procedures do not describe the use of universal screening. Focus group and case study review discussions confirmed that universal screening is not a familiar term in APS. When the process is used, it varies greatly between (and sometimes within) schools. Universal screening was not described as a tool to identify students who may require services and support through the IAT process in APS.

Referral Practices

While documented procedures for the referral of students to IATs exist, focus group participants commented that implementation practices vary by school. As one participant stated, there is "consistent inconsistency" for the IAT referral process. Parent focus group participants were particularly vocal about this variance between schools. Reportedly, referrals may, but not always, occur "when a student is struggling," and the process may include the review of performance data. Participants often viewed the IAT process as a hoop to jump through to get to Child Study. Others expressed concern that students

⁴⁵ http://www.doe.virginia.gov/special_ed/regulations/state/regs_speced_disability_va.pdf

⁴⁶ http://www.doe.virginia.gov/instruction/response_intervention/index.shtml

⁴⁷ Handouts of training sessions were provided to the PCG team, including a presentation at the Superintendent's Advisory Committee on the Elimination of the Achievement Gap, May 11, 2009.

⁴⁸ http://www.rti4success.org/categorycontents/universal_screening

were most often referred to IAT by teachers who were overwhelmed or who struggled with classroom management issues.

Every IAT plan reviewed through the case study review process was initiated because of a student's poor behavior or because he/she had problems with organization. This trend applied to all grade levels. At the elementary and middle school levels, teachers referred all of the students with IAT plans. At the high school level, students or their families initiated every case. Although some evidence was used to support development of a student's IAT plan, e.g., absences, a drop in grades or failure to complete homework, most often the IAT referral was based on a teacher's "hunch" that the student needed additional support. Once identified as needing an IAT plan for behavior or organization, several students had plans that also included strategies to address learning challenges. There appeared to be no systemic approach to identifying students who might need additional support.

Use of Interventions

One of the core elements of MTSS is the provision of research-based, increasingly intensive interventions that are targeted to student needs:

An intervention is a specific skill-building strategy implemented and monitored to improve a targeted skill (i.e. what is actually known) and achieve adequate progress in a specific area (academic or behavioral). A scientifically based intervention refers to specific curriculum and educational interventions that have been proven to be effective for most students and the research has been reported in scientific, peer-reviewed journals. A modification, on the other hand, is a change that actually lowers the standards of what is expected to be known.⁴⁹

The APS IAT procedures do not have a specific section addressing the provision of research-based interventions. The APS procedures use the terms "modification" and "intervention" interchangeably. It is important for individuals using the IAT process to understand the importance and parameters of research-based interventions and how they differ from, and are not equal to, curricular modifications or accommodations.

APS's "Seven Critical IAT Components" document does not have specific information about the intervention process other than providing general information on supporting a student's reading and naming a few intervention programs (i.e., Spell-Read, Earobics, Reading Coach, PALS Intervention, and Reading Recovery); it also references very general strategies that are not content-based to target specific reading deficiencies (e.g., book buddies, parent reading volunteers, audio books, PTA reading coaches, fridge phonics, etc.) No information is provided regarding math strategies.

Available Academic Interventions

APS provided two documents to show the interventions used by schools: the Reading Interventions Chart and a survey of interventions completed by each school. PCG assessed the interventions listed for known effectiveness and comprehensiveness to address the most typical student needs.

⁴⁹ Alliance for School-based Problem-solving & Intervention Resources in Education (ASPIRE) at www.illinoisaspire.org/central/download.php?dID=51.

Reading Interventions Chart

APS's Reading Interventions Chart lists numerous reading programs available in its schools for reading.⁵⁰ The Chart includes the following information: intervention area, assessment process, implementation schedule, audience (special education and/or general education), appropriateness for ESOL/HILT, training availability, and model of instruction (core or extended learning). Based on this information, the following interventions are available for reading:

- At the **elementary level**, five interventions are available for students receiving general and special education services. One of these interventions indicated its audience included students with IATs; one is available only for students receiving special education.
- At the **middle school level**, four interventions are available for students receiving general and special education services; three are available only for students receiving special education services, and all of the interventions are considered to be the core instructional model.
- At the **high school level**, two interventions are available for students receiving general and special education services; one is available only for students receiving special education services. All of the interventions are considered to be the core instructional model.

Academic "Interventions" Used by Schools

A survey on interventions was provided to each school and the responses compiled to catalog the strategies used in each school.⁵¹ Appendix V contains the survey results that PCG analyzed to show which "interventions" were used by each school at the elementary, middle, and high school levels. Although the schools responded with a list of "interventions" in use, the responses indicated the use of accommodations, modifications, or teaching strategies rather than interventions as defined on the prior page. This information reflects the lack of a comprehensive approach in APS for: the identification of, and access to those interventions. PCG also identified significant confusion regarding what activities constitute an intervention.

- At the **elementary level**, 208 different activities were mentioned as being used by the 23 schools. Only 7 of these activities were used by 10 or more schools: behavior plans/charts (17); FASTT Math (15); counseling groups with individual check in (12); modified workloads (11); movement opportunities (10); preferential seating (12); and sensory tools, fidgets, stress balls, etc. (11). Only 12 items were used by 6 to 9 schools. The remaining 186 items were used in 5 or fewer schools. Some other activities considered to be interventions included: bands for busy feet; instructional clarifications; class job; medication monitoring; repeating directions; reductions in homework; referral to behavior specialist, etc. A few schools cited the use of such interventions like Read 180 (1 school); Reading Recovery (5 schools); PALS instruction (1); and Voyager Reading (1 school).
- At the **middle school level**, the five schools indicated they used a total of 61 activities. No single activity was cited as being used by all five schools. Like the elementary schools, the use of preferential seating (4 schools) and counseling groups/individual check-ins (4 schools) were most frequently cited. Three schools identified the use of modified workloads, cueing for attention, and after school tutoring. One or two schools each used the remaining 56 activities. As with the

⁵⁰ http://www.apsva.us/cms/lib2/VA01000586/Centricity/Domain/152/Chart_10_13_10.pdf

⁵¹ Document called "Special Education Program Evaluation: Information Requested --School Level IAT: General Education Interventions" provided to PCG by APS.

elementary schools, many behavioral strategies were listed as well as strategies for differentiated instruction. No specific research-based intervention programs were mentioned. Please note that some schools may not have recorded districtwide interventions on their surveys.

- At the **high school level**, the five schools indicated they used a total of 74 activities. Four schools identified the use of preferential seating, three identified change of schedule, and one or two schools each used the remaining 70 items. As with the elementary and high schools, many behavioral strategies were listed as well as strategies for differentiated instruction. As with the middle schools, no specific research-based intervention programs were mentioned. Please note that some schools may not have recorded available schoolwide interventions on the surveys.

Support for Positive Behavior

Support for positive behavior cited in literature refers to a comprehensive, systemic, three-tiered approach to establishing the social, cultural, and behavioral supports needed by all students to achieve both social and academic success.⁵² The most effective implementation integrates supports for positive behavior with supports for academic success.

Although the district's IAT procedures mention support for positive student behavior, they contained little specific information regarding the issue, or for the provision of increasingly intensive interventions based on student needs. No written documents were provided reflecting standards or guidance for each school to provide positive behavior supports. This districtwide lack of guidance was highlighted in the PCG case study review of IAT plans. Participants reported no knowledge of tiered behavioral support and struggled to identify targeted interventions.

In response to a PCG request for information regarding any efforts to support positive student social/emotional behavior, including any challenges, APS wrote that it:

[p]rovides ongoing professional development in behavior management use of positive behavior supports, completing functional behavioral assessments, and writing behavior intervention plans. Training in nonviolent crisis prevention intervention (CPI) is given on a regular basis (monthly) throughout the school year.

In addition, the district's development of the Interlude Program, an alternative special education program for students whose serious emotional problems and disruptive behaviors interfere with academic achievement and interpersonal relationships, was cited as "enabling more students to remain in their home schools." However, this program is available only to students with an IEP; it is not available to students with IATs. APS stated that it had the following resources to promote positive student social/emotional behavior: two behavior specialists, three autism coordinators, a teacher resource Behavior Binder, the Mental Health Task Force, ADHD Task Force, Community Assessment Team, Home-based Services, Partnerships with Children Youth and Families and large social skills library of materials.

Implementation of Interventions

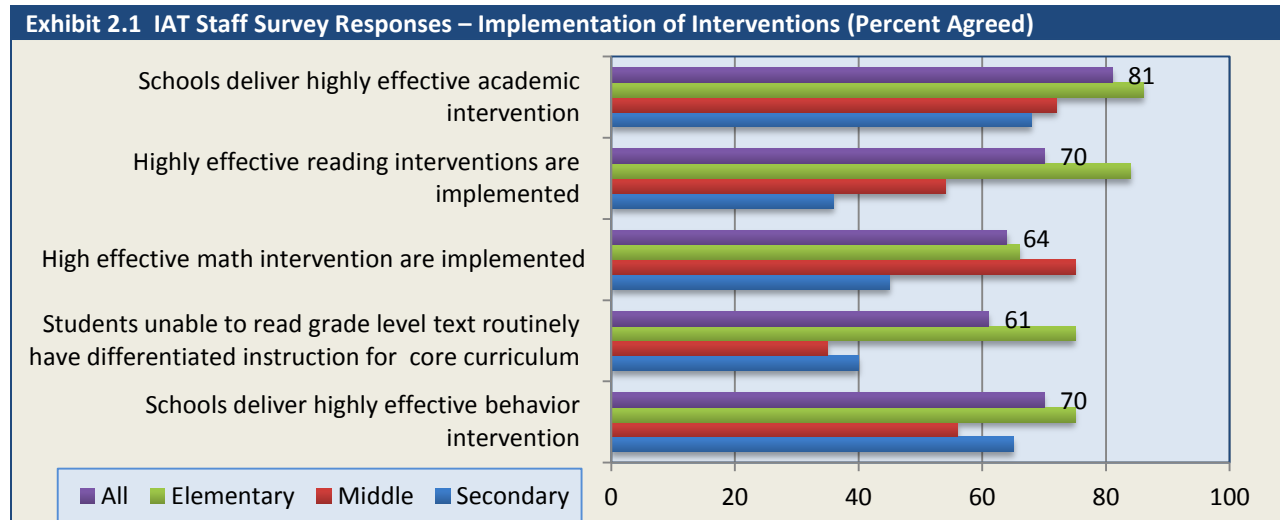
PCG focus group and case study review participants noted the huge strides the district has made in implementing its IAT process in the past five years. In addition, a large percentage of IAT survey

⁵² See, for example, the [Technical Assistance Center on Positive Behavioral Interventions & Support](#); and Florida's Positive Behavior Support Site <http://flpbs.fmhi.usf.edu/>.

respondents indicated their belief that schools provide highly effective interventions. Information from these sources also reflected areas for improvement:

- **Access to Interventions.** While participants reported the availability of interventions, there was significant variation regarding use. For example, some interventions are accessible only to Title I schools; the use of some interventions depended on the availability of training; and in other cases, the availability of reading specialists affected the number and type of interventions offered.
- **Fidelity of Implementation.** Focus group participants also cited challenges regarding the implementation of interventions with fidelity. They cited scheduling issues as the biggest roadblock to effectively delivering needed interventions. It was believed that an intervention required the sacrifice of another class, typically a student's elective. Equally, there was the noted challenge of understanding which interventions produce the biggest gains for students.
- **Meaningful Interventions.** Lack of clarity as to what constituted a research or evidence-based intervention was evident during the case study review. Participants repeatedly referenced the difficulty of developing appropriate interventions specific to a student's needs. Participants reported often feeling like interventions were arbitrarily selected based on the quick brainstorming of the group around the table. This challenge was particularly evident at the secondary school level, where so-called interventions were activities such as "go to teacher for help," "receive different homework assignments," and "participate in soccer." In one instance at the elementary level, the IAT plan only mentioned what the parents would do (i.e., visit a particular website, get the child to school on time) and made no references to interventions that would be provided to the child during the school day. In some cases, interventions were listed simply as recommendations, such as "consider ways to differentiate instruction in all subject areas" or "consider participation as a peer buddy."
- **IAT Plans.** Interventions in the IAT plans reviewed were often listed as one-time occurrences, were rarely tied to the targeted area of need, and were typically a modification to the core instruction. Only one school listed any research-based interventions (e.g. Earobics, FASTT Math). No case reviewed indicated the frequency, intensity or group size of the intervention.
- **Staff Feedback.** As reflected in Exhibit 2.1, illustrating IAT staff survey responses, there were significant variances in the quality of staff responses. In almost all cases, middle/secondary school level respondents had lower positive responses than their elementary school peers. The following responses for all grade levels indicate:
 - 81% report schools deliver highly effective academic interventions;
 - 70% report highly effective reading interventions are delivered;
 - 64% reported highly effective math interventions are delivered;
 - 61% reported students unable to read grade level text routines have their core instruction differentiated;
 - 70% reported that schools deliver highly effective behavior intervention.

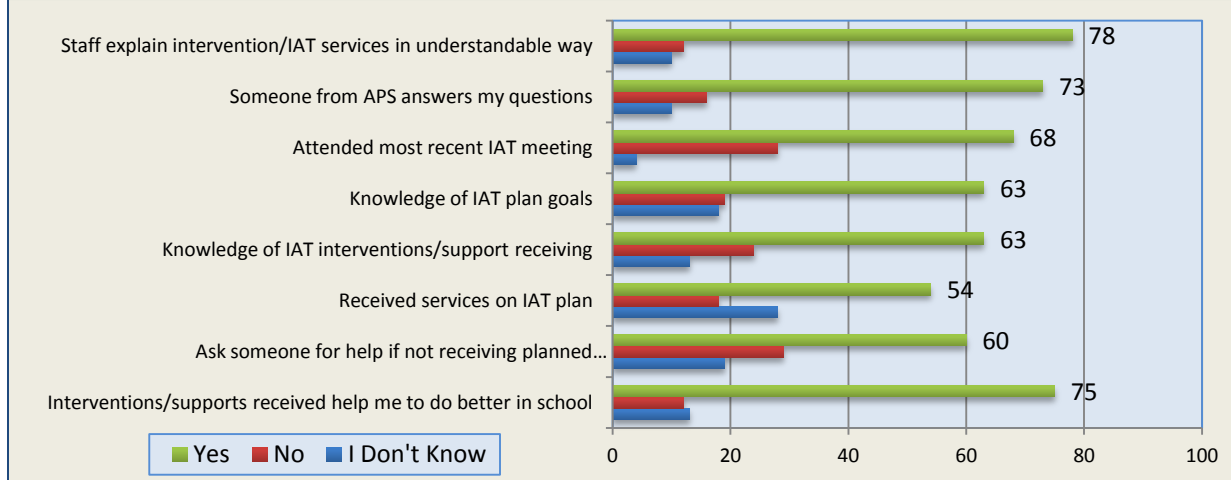
Note that this feedback reflects a disconnect between staff perception of what constitutes an effective intervention and the literature's description of this activity.



- **Student Feedback.** As reflected in Exhibit 2.2 on the following page, results from the high school IAT student survey reflect a high level of recognition (75%) from students that interventions/supports help them perform better in school.⁵³ Other positive responses relate IAT-specific issues: 78% agree that staff members explain intervention/IAT services in an understandable way; and 73% agree that someone from APS answers their questions. Other responses reflect areas for improvement in the process.
 - 68% reported attending their most recent IAT meeting;
 - 63% reported knowledge of their IAT plan goals; and 18% do not know their plan goals;
 - 63% reported knowledge of the IAT interventions/supports they are receiving; and 13% do not know;
 - 54% reported they receive services specified on their IAT plans; 28% do not know;
 - 60% reported that they ask someone for help if they are not receiving the interventions/supports specified on their IAT plans; and
 - 70% reported that schools deliver highly effective behavior interventions.

⁵³ 53% percent of the IAT student responses were ELLs.

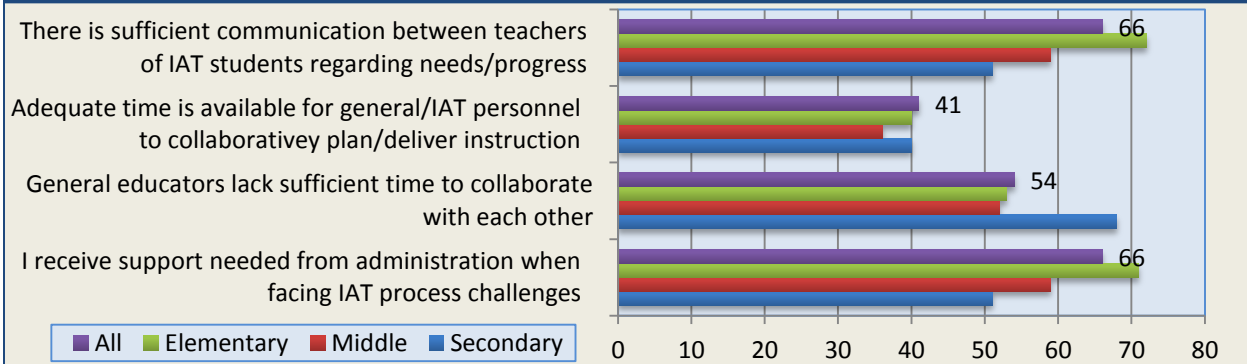
Exhibit 2.2. IAT Student Survey Responses – Meaningful Participation (Percent Agreed)



Collaborative Planning & Implementation

Respondents to the staff survey provided feedback about staff collaboration and communication regarding students involved in the IAT process. (Exhibit 2.3) Overall, 66% of staff reported that there is sufficient communication between teachers regarding student’s IAT needs and progress; a lower percentage (54%) agreed that general educators lack sufficient time to collaborate. A smaller percentage (41%) believe/responded that there is adequate time for general and IAT personnel to collaboratively plan and deliver instruction. When experiencing challenges in the IAT process, more than half (66%) indicated the receipt of administrative support.

Exhibit 2.3. IAT Staff Survey Responses – Collaborative Planning & Implementation (Percent Agreed)



Progress Monitoring

According to the National Center for RtI:

Progress monitoring needs to pay attention to the fidelity of implementation and selection of evidence-based tools, with consideration for cultural and linguistic responsiveness and recognition of student strengths. Data obtained from progress monitoring help staff assess whether students are making an adequate rate of progress and it provides information for problem solving around what may not be working for individual students or groups of students. In some instances, the problem may be the integrity or fidelity with which instruction or the intervention is delivered. District

protocols can provide guidance for defining progress-monitoring requirements for instruction and interventions.

APS's IAT procedures provide information regarding the need to collect data before, during, and after the intervention's implementation. However, these procedures neither include information about progress monitoring tools available in the district, nor provide any specificity aligned with the progress monitoring described above by the National Center for RtI. Additionally, the district's "Seven Critical IAT Components" provides only very general information about monitoring student progress. Nothing specific is provided regarding the expected regularity of progress monitoring, or the need to make any changes to a student's instruction and/or intervention based on progress monitoring results.

APS provided a list of ten progress monitoring tools currently in use. PCG reviewed these tools against the list assessed for effectiveness by the National Center on RtI.⁵⁴ PALS, the only tool APS uses reviewed by the National Center, has "convincing evidence" of efficacy in all areas except for one where it was viewed as having "partially convincing evidence" in the area of "disaggregated reliability, validity, and classification data for diverse populations."⁵⁵ APS also provided a list of the following examples of IAT formative assessment procedures used in its schools: observations, diagnostic tests, pop quizzes-not graded, questioning, discussions, self-assessments, practice presentations, and anecdotal records. These informal practices, however, are not designed for cross-rater reliability or for supporting systemic data analysis of the value of interventions and student growth in response to their usage.

Implementation of Progress Monitoring

Case study review discussions of IAT plans, and student records reviewed during the process, reflected the following:

- Student records did not reflect consistent use of progress monitoring tools and most plans included no progress monitoring activities.
- Some IAT plans referenced the use of longer-term data sources such as quarterly grades.
- There were no examples of progress monitoring scores or other data collection activities connected to the IAT plans.
- When asked, the majority of the session participants had no knowledge of the term "progress monitoring," noted they did not consider it to be a part of the IAT process, and were uncertain about how it would look as part of their practice.
- Most participants noted that this type of data collection would likely be overwhelming or too much for most classroom teachers.
- Because student achievement data currently resides in multiple locations, data analysis is labor-intensive and is incomplete.

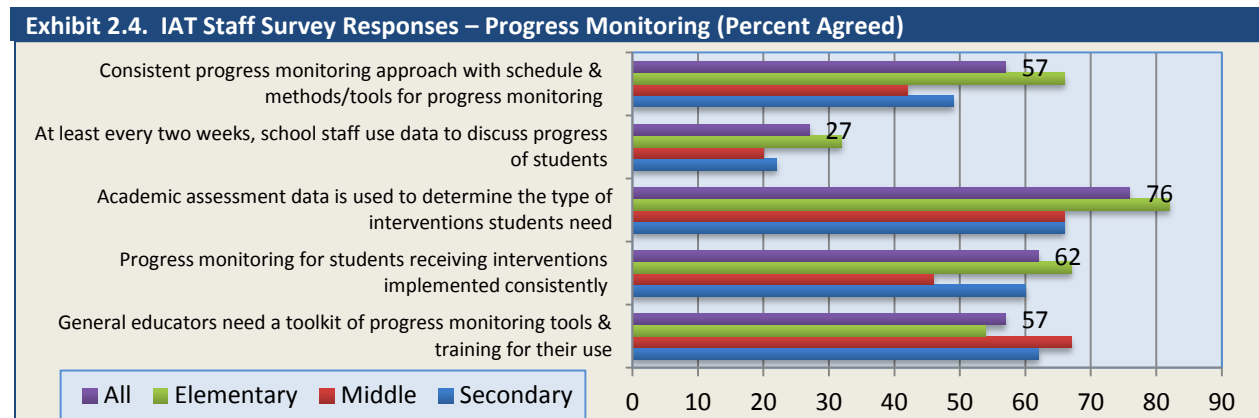
A guidance counselor at the secondary level stated that unless a parent or student requests a subsequent meeting, the IAT typically does not meet again to review the initial IAT plan and the student's progress. Focus group participants confirmed that there is a tendency for the IAT to assume that a student has benefitted from the supports provided, and that no additional action is required. When IATs do meet to review a student's plan, data was not a predominate factor in determining

⁵⁴ The National Center has a Technical Review Committee that independently established a set of criteria for evaluating the scientific rigor of various screening tools. The results from the Committee's fourth annual review of screening tools are published on the Center's website at <http://www.rti4success.org/screeningTools>.

⁵⁵ Phonological Awareness Literacy Screening (PALS) is a progress monitoring tool currently available in the district.

whether the use of interventions achieved the desired results. For example, for elementary level case review records, one of three actions typically occurred when IATs met to review student progress: 1) continue current interventions; 2) terminate the plan; or 3) refer the student for a special education evaluation. Reportedly, these decisions tended to be the result of professional judgment rather than data.

Data from the IAT staff survey responses reflected in Exhibit 2.4 showed that 76% agreed that academic assessment data is used to determine the type of interventions students need. However, the percentages of positive responses declined when addressing progress monitoring consistency (62%), and a consistent approach with schedules, methods and tools (57%). Only 27% reported that progress monitoring occurred at least every two weeks. More than half (57%) of the respondents indicated that general educators need a tool kit of progress monitoring tools and training for their use.



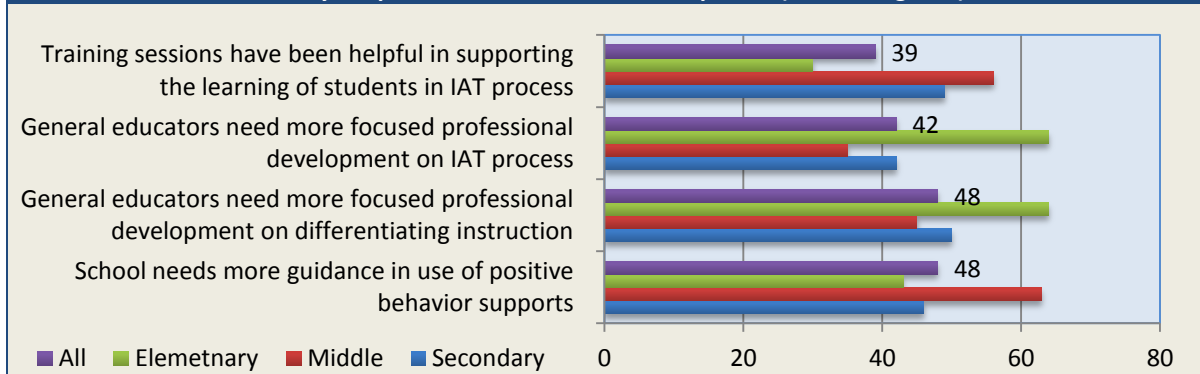
Professional Development

Several times throughout the school year, Student Services provides professional development for administrators, staff, IAT Chairs, departments and committees within the Department of Instruction (e.g., Office of Minority Achievement, Superintendent’s Advisory Committee on the Elimination of the Achievement Gap Committee and Department of Instruction). APS provided an exhaustive list of professional development sessions to the PCG team. However, there was little evidence that this information is translated into school and classroom-based actions.

As reflected in Exhibit 2.5, a small percentage of survey respondents expressed interest in receiving professional development in the areas of: positive behavior supports (24%), progress monitoring (22%), interventions (21%), differentiated instruction (19%), problem solving (15%) and using data for decision-making (11).⁵⁶ Less than half the respondents reported a need for more professional development or guidance in the following areas: IAT process (42%); differentiated instruction (48%); and guidance on using positive behavior supports (49%). Perhaps one explanation for these relatively low reports is the small percentage (39%) of respondents who agreed that training sessions have been helpful in supporting the learning of students in the IAT process.

⁵⁶ The results were different, however, on the special education survey where a much higher number of teachers were interested in professional development for differentiated instruction (33%), general education interventions (31%), support for positive behavior (44%), and social skills training (33%).

Exhibit 2.5. IAT Staff Survey Responses – Professional Development (Percent Agreed)



Standard IAT Documents

APS schools do not use a standard protocol for the development of IAT plans. The 20 schools that participated in the IAT case study review each had a different IAT plan template. Some participants reported that they created their own school-based form, while others seemed surprised to learn the form used by their school was not a standard district form. Some participants mentioned borrowing components from other schools. To that end, the quality of the IAT plan varied greatly from school to school.

Variations between the forms made it difficult to understand how to read the plan without interpretation from the individual who best knew the student. Different terminology was used across all forms and different information was included. For example, forms referred to interventions as “strategies,” “recommendations,” and “supports.” Only a few plans included provisions that PCG would expect to be standard, such as notating the person responsible for the intervention, listing a specific date to reconvene, the outcome of each intervention attempted, and implications for future instruction and intervention.

There was also no standardization across other documents related to the IAT process. For example, some schools used templates they had created for parent communication while others did not. Like the IAT plan templates, the quality and clarity of these letters varied greatly. Focus group participants noted that even what IAT is called varies by school, e.g., GAP, SIT, etc. This variance hampers communication amongst schools. Due to low response rate (5.8%) from parents of students with IAT plans, PCG was unable to complete survey analysis in this area. The low response appears to be based on confusion regarding the term “IAT” as each school uses a different term to describe this process. Based on conversations with the APS project team, parents seemed confused about the terminology used in a letter sent by APS alerting them to take a survey. We learned that schools have different names for the IAT Process and APS received numerous calls from parents wanting more information to identify if they should have taken the survey. Out of the 655 parents asked to participate in the survey, only 38 parents provided feedback, a 5.8% response rate.

Opportunities for Improvement

The following areas reflect gaps between APS's IAT process and its implementation and recognized MTSS standards.

- **Universal Screening.** APS's procedures do not describe the use of universal screening and it is not a familiar term or process to focus group and case study review participants. When the process is used, it varies greatly across, and sometimes within, schools.
- **Referral to IAT.** While documented procedures for the referral of students to IATs exist, implementation varies by school. There is no systemic approach to identifying students who might need additional support.
- **Use of Tiered Interventions.** APS lacks a districtwide and structured approach to the availability and use of effective increasingly intensive interventions in every school and grade level to meet the needs of all students to improve their academic achievement and positive behavior. There was widespread evidence that personnel misunderstand learning accommodations, modifications and other strategies to be intervention activities. One structured program, Interlude, is available only to students with an IEP.
- **Progress Monitoring.** Written guidance provides very general information about monitoring student progress. Nothing specific is provided regarding the expected regularity for progress monitoring, or the need to make any changes to a student's instruction and/or intervention based on progress monitoring results. Because student achievement data currently resides in multiple locations, data analysis is labor-intensive and incomplete.
- **Professional Development.** There was little evidence that professional development offered to APS personnel is translated into school and classroom-based actions; a small percentage of staff survey respondents agreed that their training has been helpful to them.
- **Standard Protocol.** APS schools do not use a standard protocol for the development of IAT plans. The variation between school forms makes it difficult to understand how to read the plan without interpretation from the individual who best knows the student. Also, the name for the IAT process varies by school, hampering communication amongst schools. Further, the low parent response rate for the IAT survey appears to be based on confusion regarding the term "IAT" because of the many names schools give this process.

APS has the foundation for the use of IAT to improve, in a proactive manner, the academic performance and positive behavior of all students. Although IATs appear to be utilized in some capacity across all schools in the district, their implementation and the documentation of outcomes vary greatly from school to school. This inconsistency surfaces across all aspects of the IAT process. In addition, there are important gaps between IAT and MTSS standards and the resources needed to effectively provide differentiated core instruction and interventions.

APS staff members participating in the case study review were phenomenal professionals. They were dedicated, caring and clearly wanted their students to succeed. It was unquestionably clear they were attempting to implement an IAT process in their respective schools, yet reported feeling perplexed by the process. The limited uniform guidance provided at the district level impedes their ability to develop a truly effective and efficient process at their schools. This assessment is reinforced by the IAT School-Level Evaluation Summary, which summarized feedback from IAT chairs and teams regarding IAT

strengths along with areas in need of improvement and strategies to improve the process. (See Appendix W for a description of the IAT School-Level Evaluation Summary.)

RECOMMENDATIONS

- 2. Multi-Tiered System of Supports (MTSS).** Expand on the current IAT process to make it more reflective of a comprehensive and research-based MTSS framework to ensure all students receive the instruction and interventions they need to support academic and social/emotional learning, and to achieve at a higher level of performance. With leadership of the Department of Instruction and the support of Student Services and stakeholders, establish a written vision and standards for practices that provide clear, non-negotiable expectations; and develop a comprehensive phased-in implementation plan that includes preschool through secondary grade levels. Ensure that in the delivery of professional development all staff members who need training receive it and are able to demonstrate its use. Establish communication processes to inform parents about the inclusive education initiative, and to obtain implementation feedback from parents and school personnel for follow-up action.
 - a. Leadership & Engagement.** Because MTSS is based in the provision of instruction and intervention, including the foundation of a core curriculum that is implemented with fidelity, charge the Department of Instruction with responsibility for leading the development and implementation of this initiative. Have all departments with responsibility for instruction and providing related support to schools engaged in these activities and add their expertise.⁵⁷ In addition, engage other stakeholders, including those from schools, parents, and community members. Incorporate this initiative into an existing or new Board committee/council.
 - b. Standards.** With stakeholders and building on current standards, establish formalized standards for common language, implementation of MTSS, and professional development, including the following:
 - 1) Universal screening and progress-monitoring tools** appropriate for elementary, middle, and high schools, and use of benchmark data to identify students for the MTSS process in all schools, incorporating elements relevant for ESOL/HILT students.
 - 2) Core curriculum expectations** and use of [universal design for learning](#) (UDL).⁵⁸
 - 3) Three levels of increasingly intensive research-based interventions**, including reading, math, and behavior that are culturally and linguistically appropriate, and that are available short and long term.
 - 4) Interventions that are research-based**, specific enough to **monitor for fidelity** at multiple grade levels, and appropriate for differing content levels.
 - 5) Progress monitoring**, including the calculation of targets for student progress when provided with appropriate research-based interventions, and on initiating a referral for special education services when sufficient progress is not made after providing the appropriate interventions.

⁵⁷ It is expected that Student Services representatives would have a major role in this process given their knowledge and skills.

⁵⁸ Through a Universal Design for Learning (UDL) approach, curriculum is initially designed with the needs of all students in mind, so that methods, materials, and assessment are usable by all. See National Center on Universal Design for Learning at www.udlcenter.org/.

- 6) **Scheduling**, including best practice models for facilitating use of the broadest range of intervention providers.
 - 7) **Standardized forms** and other documentation.
 - 8) **Professional development**, including expectations for providing and requiring staff participation.
 - 9) **Active student involvement** in the IAT process, including progress monitoring and planning.
 - 10) **Electronic communication tools** and other methods for collaborating with parents/families and providing them access to information.
 - 11) **MTSS interface with referral** for special education and Section 504 evaluations.
- c. **Data.** Regularly collect, analyze, report, and follow up on student academic/behavior-related data. Show the connection between this data and its use to show student academic progress and evidence of personnel performance. Disaggregate student-level data by special need areas, race/ethnicity, ELL, economic disadvantage, school, school grade levels, as feasible and appropriate, to inform decision-making for the following issues:
- 1) **Representation of students** in various special needs and disability areas to identify over/underrepresentation and establish follow-up activities.
 - 2) **Performance data** to identify instructional gaps. Benchmark progress of students with an IEP against their general education peers.
 - 3) **Attendance** to identify students and schools with high absence rates to ensure that schools are taking expected steps to increase their attendance.
- d. **Implementation Plan.** Develop a phased-in three to five year implementation plan. Address needs for dual identified (ELLs with an IEP), students with disabilities, students who are gifted and twice exceptional students (gifted students with an IEP); identify staff accountable; establish roles and responsibilities; provide for differentiated professional development and parent training; establish demonstrable outcomes; and include the following components:
- 1) **Research-based Interventions.** Based on a menu of research-based multi-tiered interventions for reading, math and social/emotional learning, establish a two to three year timeline for each school to have access to sufficient resources and training for their students.
 - 2) **Districtwide & School-based Teams.** Have districtwide and school-based teams facilitate implementation based on parameters set by the Leadership Team and standards described in *New Teacher Teams Support Integrated Comprehensive Services*.⁵⁹
 - 3) **Fiscal.** Determine the fiscal implications of enabling schools to retain special educators as “interventionists” to provide support for all students if the need for these teachers is reduced because there are fewer students who need special education services.
 - 4) **Time Frame.** Establish an aggressive but reasonable overall time frame, e.g., five years, for implementation and individualize transition of students back to their home schools, ensuring that appropriate supports and services are in place.

⁵⁹<https://www.dropbox.com/s/7hpo5vlxpnviqtc/%20New%20Teacher%20Teams%20to%20Support%20Integrated%20Comprehensive%20Services.pdf>

- e. **Professional Development.** As part of the professional development program referenced in the Districtwide Implementation Plan, incorporate the following:
- 1) **Professional Learning Standards.** Professional development based on national professional learning standards, such as Learning Forward's Standards for Professional Learning.⁶⁰
 - 2) **Core Content & Reading Instruction.** Plan for how special educators will become more knowledgeable about core curricular content and reading instruction to become both highly qualified and effective teachers. Include, as appropriate, general educators and ESOL/HILT teachers.
 - 3) **Dual Identified Students.** Information relevant to ELLs, including Sheltered English Instruction Protocol (SIOP) training and reinforcement. For ELLs, reinforce use of the Sheltered English Instruction Protocol (SIOP).
 - 4) **Engage Stakeholders.** Inclusion of the following/other relevant groups when planning learning opportunities: principals; general, special and gifted educators; special education assistants; ESOL/HILT teachers; clinicians; administrators; and parents. Differentiate instruction for varying knowledge/skills and ensure that sessions clearly identify and address the knowledge/needs of the intended audience.
 - 5) **Access to Training.** Utilize a broad range of training models, such as the following:
 - a) **Multiple formats** (e.g., videos, webinars, narrative text, distance learning) and presentation models (e.g., school-based, small groups, etc.) that are differentiated, based on current levels of staff knowledge and skills.
 - b) **APS's website** to present access to training materials for various stakeholders.
 - c) **Cross-functional teams** with individuals who directly support schools in order to provide primary training to the broadest spectrum of administrative and instructional staff, so they can help provide direct support, mentoring, coaching, and technical assistance to principals and teachers.
 - d) **Cross-school opportunities** to discuss inclusive instructional challenges and issues, to emphasize consistency across APS schools, and to visit exemplary MTSS practices. (Note: identify exemplary schools for this purpose.)
 - e) **Trainers** who are staff members and others having the experience and knowledge to be part of a professional development faculty.
 - f) **Modified walk-through protocols** to include the standards, monitor the extent to which school practices conform to the guidance, and initiate technical assistance, professional development, coaching, and mentoring as necessary to improve practices.
 - g) **Certification.** Ensure that in the delivery of professional development all staff members who need training receive it and are able to demonstrate its use. Mandate components of essential training and provide a certificate of demonstrated performance.
- f. **Communication & Feedback**
- 1) **Internal.** Establish a timely communication and feedback process to share solutions to MTSS implementation barriers. Several problem areas are likely to require a targeted group of

⁶⁰ <http://www.learningforward.org/standards#.UMvVD7Yt0kU>

knowledgeable people to resolve implementation 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) Parent/Families.** With input from parent groups, develop electronic and written materials and other modes of communication to explain MTSS to families, its progress, and how parents can have input in and be involved with the process.
- g. CLASS Observation Protocol.** Review the CLASS observation protocol to ensure that it includes sufficient indicators relevant to differentiated instruction and MTSS implementation and that observers have the knowledge and training necessary to assess these areas.⁶¹
- h. Electronic Record Systems.** Develop an electronic record system with user-friendly reports to support MTSS implementation in a manner that is similar to APS's electronic IEP system. Use all relevant data stored in these systems to prepare reports by school, grade level, class, program, and other categories to inform decision-making at all APS levels.
- i. Use of Federal/State Funds.** Investigate how funds 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 in public schools.⁶² Use funds appropriated for providing reading intervention services to 100% of eligible students in grade three prior to promotion to grade four.⁶³

⁶¹ Information about use of the Classroom Assessment Scoring System (CLASS) is detailed in Section 4.

⁶² 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.

⁶³ http://www.doe.virginia.gov/instruction/english/elementary/reading/early_intervention_reading.shtml

Section 3. Section 504: Administration & Implementation

Section 504 is a civil rights law that prohibits discrimination based on disability in any program or activity receiving federal financial assistance, such as school districts. Generally, Section 504 applies to students with a physical or mental impairment that substantially limits a major life activity. These terms are not limited to lists of specific impairments and major life activities, and eligibility is to be broadly construed:

- There is not an exhaustive list provided for physical or mental impairments “because of the difficulty of ensuring the comprehensiveness of such a list.”⁶⁴
- The nonexhaustive list of major life activities includes items such as: caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, working, etc.
- The term “substantially limits” is not defined and is expected to be construed broadly in favor of expansive coverage to the maximum extent permitted by the law.⁶⁵

Since 2008, Section 504 has applied the expanded coverage required under the Americans with Disabilities Act (ADA) amendment. Accordingly, when determining a student’s eligibility under Section 504, the process must exclude consideration of the ameliorating effects of any mitigating measures that the student is using to accommodate his/her physical impairment, e.g., medication, academic or behavior support, etc.

This section assesses the efficacy of the district’s administration and implementation of Section 504 processes, taking into consideration its application of changes required by the ADA. The assessment is based on documents provided by APS, and information from focus groups, surveys, and case study review sessions.

Written Procedures

PCG reviewed APS’s written procedures and guidance for the implementation of the Section 504 process to assess their alignment with federal requirements.⁶⁶ PCG provided APS detailed feedback regarding this analysis in PCG’s first interim report. This feedback included language changes in the following areas:

- Section 504 and IDEA similarities and differences
- Consideration of record of impairment and regarded as having an impairment
- Explanation of major life activities
- Section 504 meeting participants
- Referral and screening

⁶⁴ Protecting Students With Disabilities, Frequently Asked Questions About Section 504 and the Education of Children with Disabilities, Office for Civil Rights, U January 19, 2012
at <http://www2.ed.gov/about/offices/list/ocr/504faq.html>.

⁶⁵ Office for Civil Rights, *Questions and Answers on the ADA Amendments Act of 2008 for Students with Disabilities Attending Public Elementary and Secondary Schools* at <http://www2.ed.gov/about/offices/list/ocr/docs/dcl-504faq-201109.html>.

⁶⁶ PCG reviewed the following documents: Section 504 Guidelines (revised 2008); draft Section 504 Guidelines (October 2011); draft Section 504 Guidelines (January 2012); the "504 Meeting Process," "Transitioning Back to School;" the "504 Question and Answer Brochure; and information available on the Student Services website.

- Referral for special education evaluation
- Section 504 evaluation, plan and placement
- Discipline procedural safeguards
- Mitigating measures consideration
- Consideration of private evaluations and diagnoses
- Relationship between care plans, health care plans, medical alerts and Section 504 plans
- Consideration of students who have good grades
- Form and criteria for eligibility consideration
- Use of service animals

Additional Information about the district's Section 504 procedures is provided in Appendix X. Subsequent to its receipt of PCG's guidance, APS provided an updated version of its guidelines, which is now entitled "Arlington Public Schools Section 504 Procedural Manual." In response, PCG offered a few additional comments that APS addressed in its final document.

Section 504 Implementation

During the case study review process, discussions reflected that some participants understood how Section 504 requirements have changed since the ADA amendment; however, most did not. In addition, there were other Section 504 requirements that participants did not fully understand. The following sections summarize these areas.

- **Consideration of Students with Health Plans.** Case study review participants provided rationales for not considering Section 504 eligibility for students with health plans that included such factors as illness and lack of educational impact. Generally, students with health plans have a physical or mental impairment that most likely involved a major life activity. It seems that students at APS are not considered for a Section 504 plan when they are able to manage their illness, do not require any or significant accommodations, or there is no apparent impact on education. These reasons, however, do not negate potential Section 504 eligibility. As a result of inconsistent understanding in this area, school practice varies with respect to how students with health plans are considered under Section 504: one school had about 30 students on a health plan and none of them were developed with a consideration of Section 504. Another school principal (who acts as case manager) said that health plans always trigger a 504 plan.⁶⁷
- **Improved Performance.** There was a common misconception that if a student is improving his/her performance through the IAT process or is performing adequately when another accommodation is being provided, e.g., hearing aid, that Section 504 would not be relevant. This consideration, however, is not relevant to determining eligibility under Section 504. Based on the ADA amendments, eligibility determination is not permitted to take into consideration any mitigating measure.
- **Accommodations vs. Best Practices.** Case study review participants expressed concern that it was sometimes confusing for parents and staff to differentiate some 504 accommodations from "best

⁶⁷ Note: when students with IEPs also have a health plan, some schools keep the plans with the IEPs and other schools keep them in the health office only.

practices.” For students with a disability only under Section 504, the team considers the aids, services and other supports to be provided to the student in general education classes, other education-related settings, and in extracurricular/nonacademic settings to meet the student’s individual educational needs as adequately as the needs of students without disabilities are met. The overriding consideration is that the Section 504 plan includes aids, services, and other supports that have been shown to be effective, or the team has reason to believe will be effective, to provide the student with an equal educational opportunity.

- **IDEA vs. Section 504.** Participants often expressed that if there are concerns about teaching strategies and instruction for a child, IDEA special education services pursuant to an IEP would be a more likely route than Section 504. However, IDEA criteria relates to whether a student meets eligibility for one of the Act’s specified disabilities and needs special education services to benefit from education. Teaching strategies and instruction could refer to non-special education services, e.g., general education interventions and differentiated instruction, etc., that could be provided under Section 504 for eligible students.
- **High Standard for Substantially Limits.** Case study review participants referred to a relatively high standard for determining the meaning of *substantially* as it is used to describe the degree to which an impairment limits a major life activity. This means that APS’s standard for the use of the term may be higher than the ADA amendment standard, which is meant to be applied broadly and liberally.
- **Impact of Outside Evaluations & Parent Involvement.** There was a significant degree of variance regarding a student’s eligibility for Section 504 when the student does not meet IDEA requirements. Although several case studies reflected appropriate consideration and usage of Section 504, participants mentioned that this was not a typical practice in their schools and the consideration most often occurs when parents bring in outside evaluations. There was also concern that this circumstance frequently involves relatively high performing students and that similar advocacy does not exist for lower performing students with less involved parents. Another concern was that there are circumstances where parents raise issues that are not obvious to school personnel.
- **ADHD Consideration.** There was a misunderstanding that only an outside professional could make a diagnosis of a student as having attention deficit hyperactivity disorder (ADHD). As a result, some participants believed they should not mention that a student might have ADHD because then the district would then have to pay for an outside evaluation. Others understood correctly that the presence of ADHD, whether under IDEA’s category of other health impairment (OHI) or Section 504, is one that is determined by school personnel and does not require an outside evaluation.
- **Spanish Immersion Program.** Participants referenced some challenges regarding APS’s Spanish Immersion program and the extent to which staff understand the parameters of Section 504 and requirements related to the provision of supplementary aids and services.

The case study review process revealed no obvious different treatment of students based on their race, ethnicity, language or culture. All files reviewed pertaining to students who exited Section 504 services reflected students who were subsequently found eligible for special education services and transitioned to IEPs. However, it is important to note that while 22% of APS are English Language Learners, this population of students comprises only 7% of students identified as receiving Section 504 services.

Website Information about Section 504 Process

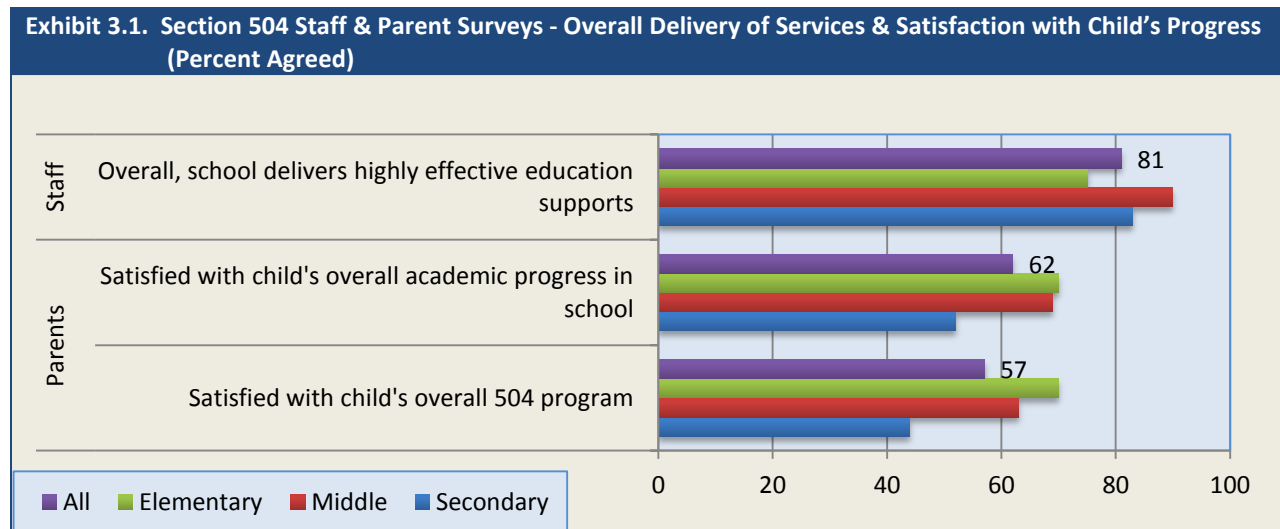
The Office of Pupil Services has a Section 504 webpage that provides the purpose and definition of the Act. The webpage now has a link to the Section 504 Manual and a link to an Office for Civil Rights, U.S. Department of Education (USDE) webpage.

Feedback from Staff, Parents & Students with Section 504 Plans

In addition to the information discussed above, staff, parents of students with Section 504 plans and students with these plans provided feedback about APS’s Section 504 process and its implementation through surveys. Detailed information about the surveys, how they were conducted and their results is provided in Appendix Y.⁶⁸ Survey results are summarized below.

Overall Delivery of Services & Satisfaction with Child’s Progress

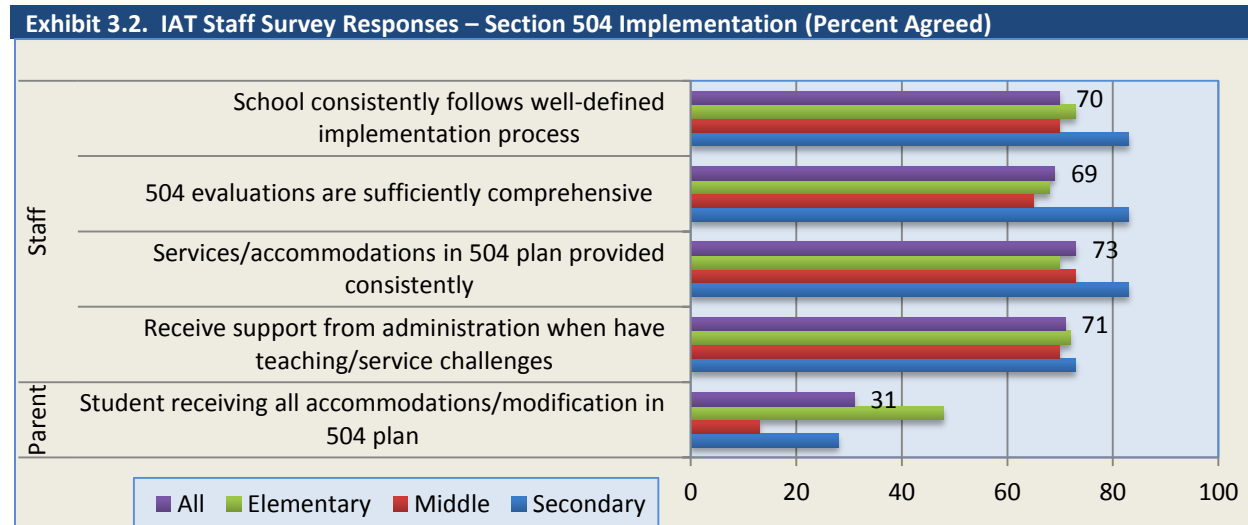
Overall, 81% of staff respondents agreed that their school delivers highly effective education supports. A smaller percent (57%) of parent respondents are satisfied with their child’s overall Section 504 program and a slightly larger percent (62%) are satisfied with their child’s overall academic progress in school.



Implementation of Interventions

Regarding the implementation of various Section 504 processes, 70% of staff respondents agreed that schools consistently follow well-defined implementation processes; 69% agreed that Section 504 evaluations are sufficiently comprehensive; and 71% agreed that they receive support from administration when they have teaching/service challenges. Staff and parent respondents had significantly different perceptions of the extent to which students receive Section 504 plan–specified services. While 73% of staff reported that these services were provided consistently, only 31% of parents shared this opinion. In all areas, a higher percent of staff respondents at the secondary level compared to those at other grade levels agreed with these statements.

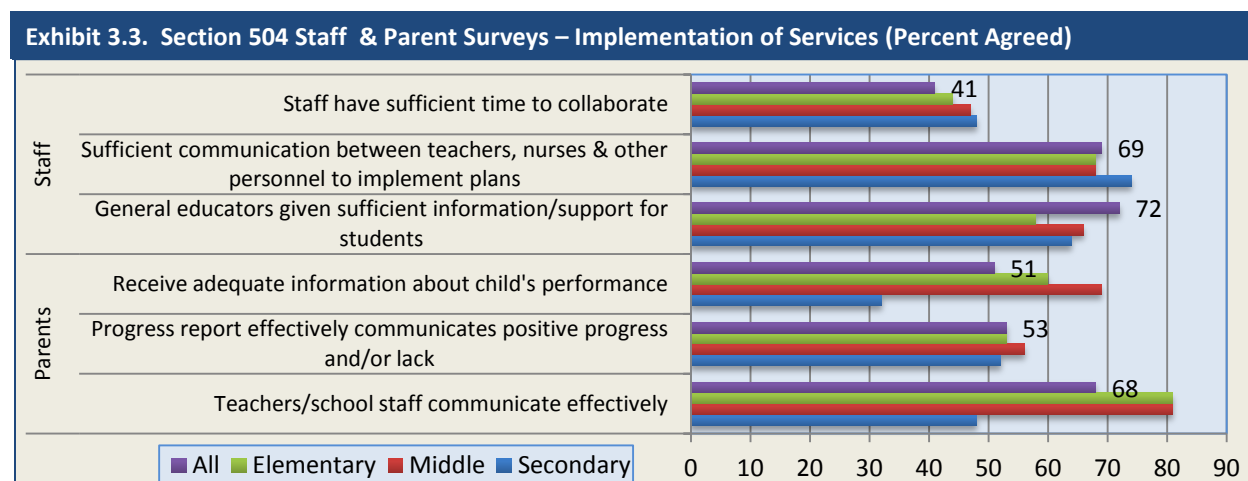
⁶⁸ Survey respondents: 990 (33.5%) APS staff responded and 455 of them indicated they work with students having Section 504 plans; 63 (41%) APS parents of children with Section 504 plans responded; and 46 (75%) APS high school students with 504 plans responded.



Implementation of Services

Staff and parent respondents provided feedback regarding a variety of areas pertaining to staff collaboration, progress monitoring/reporting and other activities relevant to the implementation of Section 504 services. As illustrated in Exhibit 3.3, the percentages of positive agreement for an area varied by grade level.

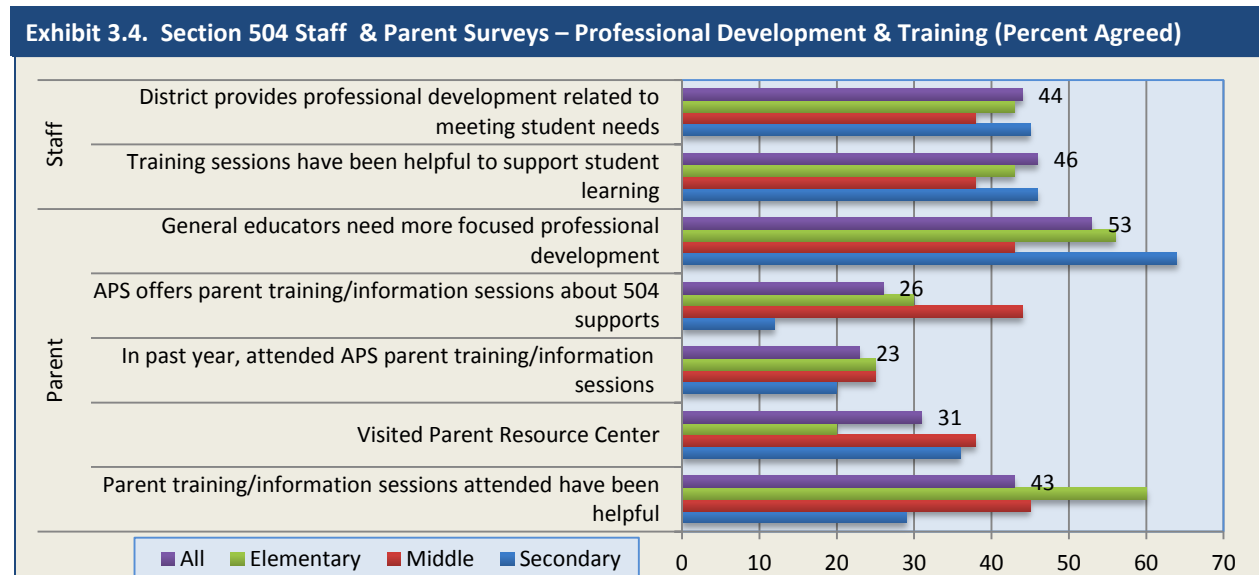
- Staff Collaboration.** 72% of staff respondents agree that general educators are given sufficient information/support for students and 69% agree there is sufficient communication between teachers, nurses and other personnel to implement Section 504 plans; 68% of parent respondents agreed that teachers/school staff communicate effectively. However, a much lower 41% of staff indicated they have sufficient time to collaborate to support relevant activities.
- Progress Reporting.** About half (51%) of parent respondents agreed that they receive adequate information about their child’s performance and a similar 53% agreed that progress reports effectively communicate information about their child’s progress.



Professional Development & Training

Staff and parent respondents provided feedback that reflected concern with respect to the provision of professional development and training. As in the areas above, there was significant variability based on the grade level relevant to the respondent.

- **Helpfulness.** 44% of staff agreed that APS provides professional developed relevant to meeting the needs of students; and 46% indicated that training sessions have been helpful to support student learning. This rate of response is only a little higher than the 39% of staff respondents to the IAT survey. Similarly, 43% of parents responded that parent training/information sessions they attended have been helpful.
- **Access to Parent Training.** 26% of parents indicated that APS offers parent training/information sessions for Section 504 support; 23% reported they had attended a session, however, only 31% reported that they had visited the Parent Resource Center.
- **Parent.** 53% of parent respondents agreed that general educators need more focused professional development.



Professional Development Interest

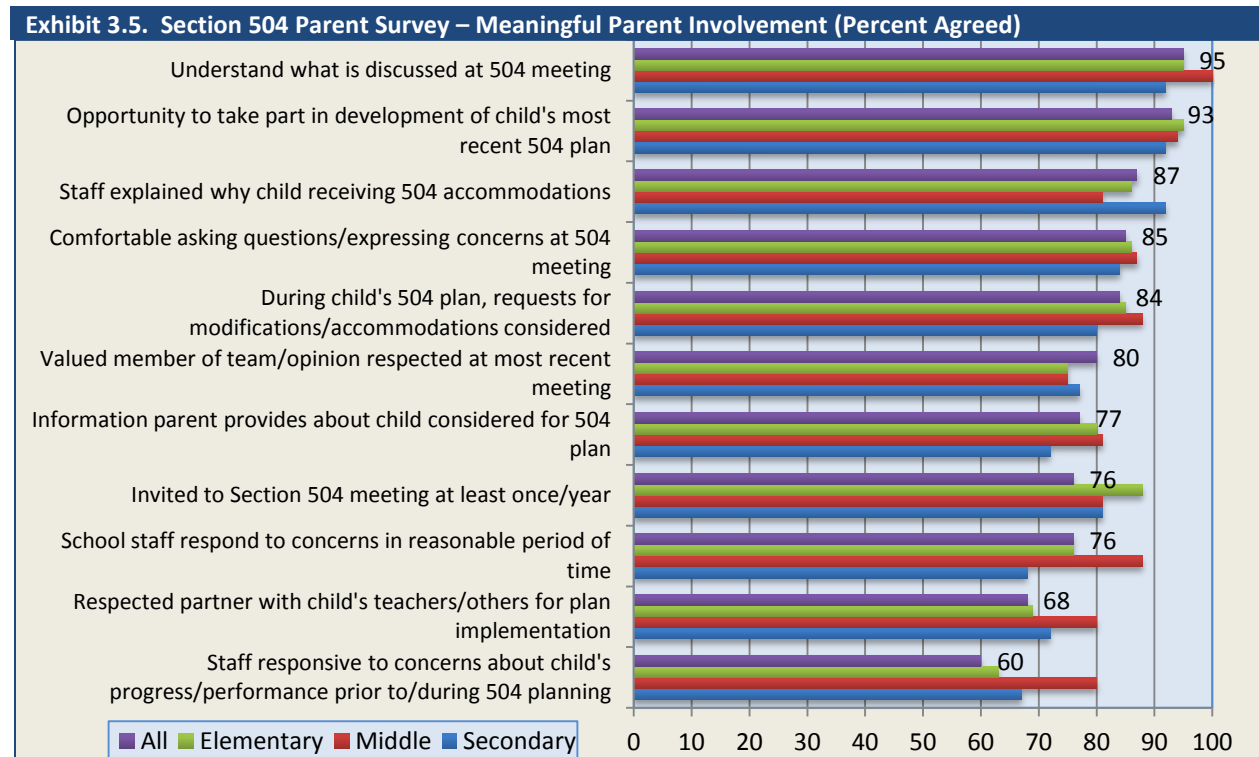
Both parent and staff respondents noted professional development interests related to Section 504, which is reflected below by area and the number of respondents for each area.

- **Staff** expressed interest in professional development related to: accommodations/modifications (178); Section 504 in general (144); Section 504 plan development (85); evaluations (82); child find (57); and other (23).
- **Parents** expressed interest in receiving training in the following areas: supporting positive behavior (19); learning homework strategies (13); understanding the Section 504 process (9); and other (11).

Meaningful Parent Involvement

A high percentage of parent respondents agreed that APS staff included them in Section 504 planning activities and involved them in meaningful discussions about their child.

- 95% indicated they understand what is discussed at Section 504 planning meetings; and 87% agree that staff members explain why their child is receiving 504 accommodations.
- 85% are comfortable asking questions/expressing their concerns at Section 504 meetings; 84% indicated their requests for modifications and/or accommodations are considered; and 80% agreed they are valued members of the team and their opinion was respected at the most recent meeting.
- 76% indicated that school staff members respond to their concerns in a reasonable period of time.
- 68% agreed they are respected partners with their child’s teachers and others with respect to the Section 504 plan implementation.
- 60% reported that staff members are responsive to parental concerns about their child’s progress and performance prior to and during the Section 504 planning process.



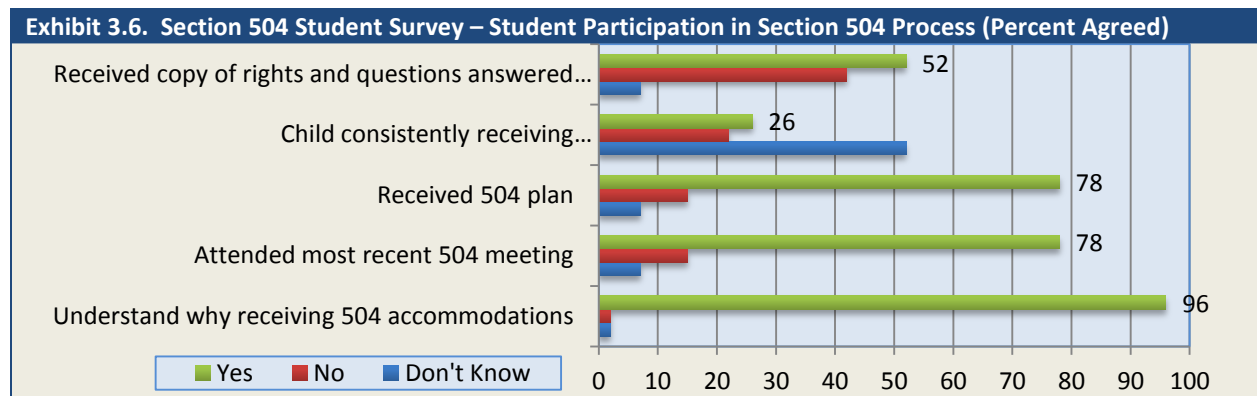
Provision of Procedural Safeguards

With respect to the area of Section 504 procedural safeguards, 88% of parent survey respondents agreed that they received a parental rights document from APS at least once each year; this percentage did not vary by the grade level of their students. Overall, 77% of the respondents reported that staff members offered to explain the parental rights document to them and to answer any questions. This response varied by student grade level: 80% elementary, 88% for middle and 68% for secondary school students.

Student Survey Feedback

Surveyed high school students provided the following feedback about their participation in the Section 504 process:

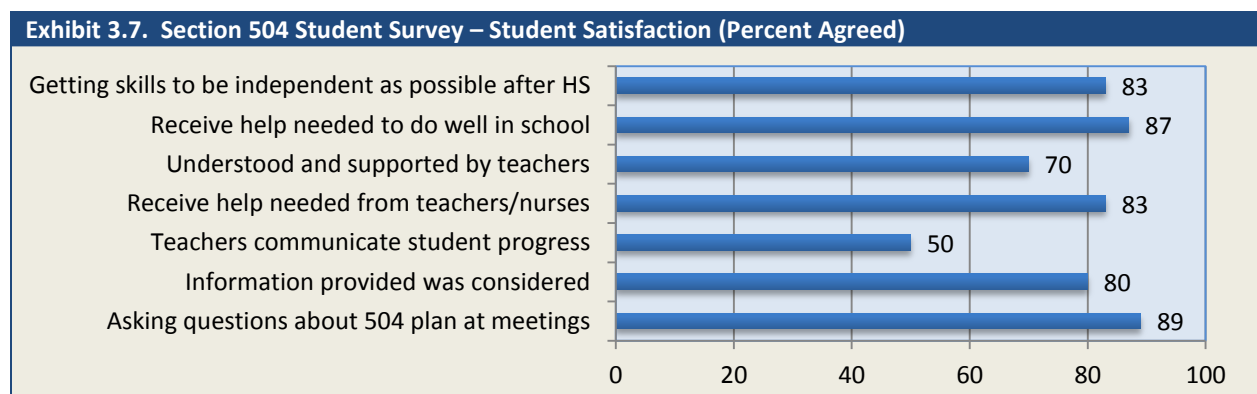
- Almost all (96%) agreed they understand why they receive Section 504 accommodations; 78% indicated they attended their most recent Section 504 meeting and the same percentage received a copy of their plan; 52% of those at least 18 years of age agreed that they received a copy of Section 504 rights and questions.
- A small percentage (26%) of student respondents indicated that they consistently receive supports and accommodations listed in their Section 504 plans; however, 52% did not know if they agreed with this statement.



Students also provided the following feedback about their involvement in the Section 504 process, the support they are receiving and perceived outcomes for the future:

- 89% asked questions about their section 504 plan at meetings, 80% indicated that information they provided was considered, and 83% reported they were gaining skills geared towards being independent after high school.
- 87% agreed they received help to do well in school and 83% agreed that needed assistance was received from teachers and nurses; 70% agreed they were understood and supported by teachers.

Only half (50%) of the students indicated that teachers communicate information about their progress.



Interest in Receiving Additional Information

Students expressed an interest in receiving additional information about the following: understanding the Section 504 process, homework strategies, and help with positive behavior.

Opportunities for Improvement

APS has revised its Section 504 standards; however, there are various issues relating to the understanding of Section 504 requirements and their effective implementation.

- **Misunderstanding.** There is misunderstanding of Section 504 stemming in part from the district's prior procedures. These areas are related to: students with health plans; students with improved performance through the IAT process; the difference between the provision of accommodations and best practices; the difference between Section 504 and IDEA requirements; and standards for determining the application of Section 504's "substantially limits" standard.
- **Additional Concerns.** Concerns were identified regarding the influence of outside evaluations; asking for outside evaluations when considering a student suspected of having ADHD; and the Spanish Immersion Program and the extent to which Section 504 supports are considered and provided.
- **Underrepresentation of ELLs.** Another area of note concerns the apparent underrepresentation of ELLs (7%) who are receiving Section 504 services compared to their proportion of the district's total enrollment (22%).
- **Implementation.** Overall, most staff, parents and students agreed that the district's Section 504 processes were being implemented; parents and students confirmed that staff explain information, value their input, and answer their questions. However, while most staff (735) reported that these services were provided consistently, only 31% of parents shared this opinion and 28% of students agreed they consistently received their Section 504 plan's listed supports and accommodations (although 52% did not know if they agreed with this statement.) Although most staff and parent respondents agree there is a high level of collaboration between staff and parents, only 41% of staff indicated they have sufficient time to collaborate to support relevant activities.
- **Progress Monitoring & Reporting.** About half of the parent respondents indicated that they received adequate information about their child's performance and that progress reports effectively communicated information about their child's progress; and half of the students indicated that teachers communicate information about their progress. A smaller percentage of staff and parents indicated that the professional development they have received has been helpful.

RECOMMENDATIONS

3. **Expedite the review and revision of all documents necessary to implement APS's Section 504 Procedural Manual revised Section 504 and take additional steps to maximize their operation.**
 - a. **Training.** Continue training for current and future principals and other relevant school-based personnel, ensuring that it addresses areas of concern listed in the PCG report and that it is meaningful to participants. Additionally, enhance outreach to parents to provide them information regarding the Section 504 revised standards and their implementation, and to encourage them to visit the Parent Resource Center.
 - b. **Progress Monitoring.** Ensure that student progress data is collected and shared effectively and regularly with parents and with students on a regular basis.
 - c. **Implementation.** Ensure that APS's revised Section 504 standards are implemented appropriately for all students. Track Section 504 eligibility rates and determine whether the rates for ELLs become more proportionate to ELL student enrollment. Take steps to ensure that

the supplementary aids and services listed in Section 504 plans are implemented consistently and that staff members have time to collaborate as needed to coordinate and share information about student needs and progress.⁶⁹ Finally, take steps to ensure that students, especially those at the high school level, are engaged as appropriate in the development and implementation of their Section 504 plan.

- d. Electronic Section 504 Record System.** If economically feasible, develop an on-line system to support the Section 504 process, which would be similar to but not as complex as the electronic IEP system.
- e. Section 504 Webpage.** Provide a link to the Office for Civil Rights, U.S. Department of Education's website.

4. Review Nursing Staff Policies and Procedures.

- a. Data.** Add fields to the SIS to capture whether a student has a health plan, the plan's date, and access to the plan for individuals with permission to do so.
- b. Nurses.** Provide additional training to nurses regarding relevant APS policies and procedures; consider feasibility of having nurses provide training to school personnel about health resources in the community and their work; and provide all relevant personnel training on Section 504 current policies and procedures. For students with health issues, involve a nurse or other personnel knowledgeable about the student and his/her health condition(s) at MTSS, Section 504 and IEP meetings to ensure the issues are fully discussed and understood, and to maximize informed communication between school teams and parents about health matters.

⁶⁹ The recommendation regarding collaboration for Section 504 services applies also for students receiving MTSS interventions and/or students with IEPs.

Section 4. Special Education: Administration & Implementation

Introduction

Special education is defined under the IDEA as specially designed instruction to:

- Address the unique needs of a student that result from his/her disability; and
- Ensure the student's access to the general curriculum, so that she/he can meet the educational standards that apply to all students.⁷⁰

IDEA, which is supplemented by Virginia provisions, establishes standards for the provision of students with disabilities who need special education and related services, including their education in the least restrictive environment (LRE) based on an IEP. A complex system of procedural safeguards governs this process.

Research has consistently reported a positive relationship between inclusive and effective instruction and better outcomes for students with disabilities, including higher academic performance, higher likelihood of employment, higher participation rates in postsecondary education, and greater integration within communities. Also, research reports that the inclusion of students with a range of disabilities in general education classes benefits the achievement of their nondisabled peers.⁷¹ Inclusive education is effective when conditions, such as the following, are in place: differentiated instruction, thoughtful scheduling, appropriate and adaptive materials, flexible groupings, and well-trained special and general educators and related services personnel who collaborate and co-plan.

All but a very small percentage of students with an IEP take a regular state assessment. When special educators teach students from as many as four grades in one class, it is extremely difficult, if not impossible, for them to focus on each grade's standards with any depth or effectiveness. When schools are organized in an inclusive manner, they are better able to support students with various disabilities and enable more to attend the school they would otherwise attend if not disabled; that is, their home school. This model enables more students with disabilities to attend school within their community, supports a more natural proportion of students with disabilities in each school, and reduces transportation time and costs.

This section of the report explores the extent to which APS has supported the provision of special education and related services in a manner that is aligned with this research. How teachers effectively educate students with varying learning differences in inclusive learning environments is a reflection of the overall quality of the instruction of students with disabilities.

Educational Setting Data

Based on U.S. Department of Education requirements, all states collect data regarding the education of students receiving special education in various educational settings based on the following parameters:

- In general education classes: at least 80%, 79% to 40%; and less than 40% of the time.

⁷⁰ IDEA regulation at 34 CFR 300.39

⁷¹ See Kalamouka A., Farrell P., Dyson A., & Kaplan, I. (2007, December). The impact of placing pupils with special educational needs in mainstream schools on the achievement of their peers. *Educational Research*, 49(4), 365–382.

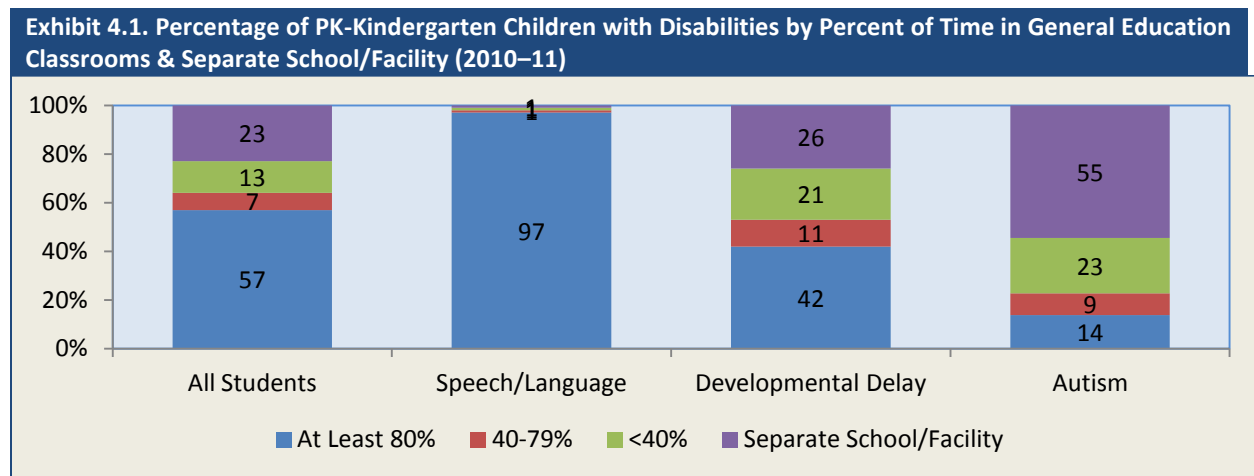
- Separate schools (both public and private)

The following reflects this data and compares APS with the state, nation and comparable districts.

Pre-Kindergarten (PK) & Kindergarten (K)

Based on information provided by APS, data is available for 369 young children with an IEP in pre-kindergarten and kindergarten in various educational settings: 212 of them (57%) are educated in general education classes at least 80% of the time; 47 (13%) are in these classes less than 40% of the time; and 85 children (23%) are in separate schools or facilities.⁷² A relatively large number of children (57 or 13%) have no educational setting data recorded.

Educational setting data for the most common disability areas [speech/language impairment (S/L), developmental delay (DD) and autism] show that 130 (97%) of the children with S/L are educated in general education classes at least 80% of the time, compared to 42% of those with DD and 14% with autism. Students with DD and autism comprise the largest percentages of students in general education classes less than 40% of the time, 21% and 23% respectively. Of these three disability areas, the largest percentage of students educated in separate schools/facilities is for the area of autism [24 (55%) of 44 children]. This data in Exhibit 4.1 below reflects the above percentages of students in each educational setting.



Grades 1-12

For students in grades 1 through 12, 50% are educated in general education classes at least 80% of the time and 17% less than 40% of the time; 4% are educated in separate schools/facilities. As with the young children in preschool and kindergarten, there is much variability in educational settings based on a student’s area of disability.

Almost all students with S/L (86%) are educated in general education classrooms at least 80% of the time. The next highest percentage is for other health impairments (63%). Although all students with a specific learning disability (SLD) participate in the Virginia Standards of Learning (SOL) assessment, only 47% are educated in general education classrooms at least 80% of the time. Students with intellectual disabilities have the lowest percentage (2%) for education in this setting. While S/L (3%) and intellectual

⁷² APS provided data for Figures 1-3: spreadsheets labeled: 5_Qry_December1+Race+LEP_2010-11.xlsx.

disabilities (55%) groups represent the extremes for “less than 40% of time spent in the classroom”, the other disability groups are more closely aligned— other health impairment (12%), SLD (17%), emotional disturbance (ED, 22%), autism (23%), and multiple disability (24%).

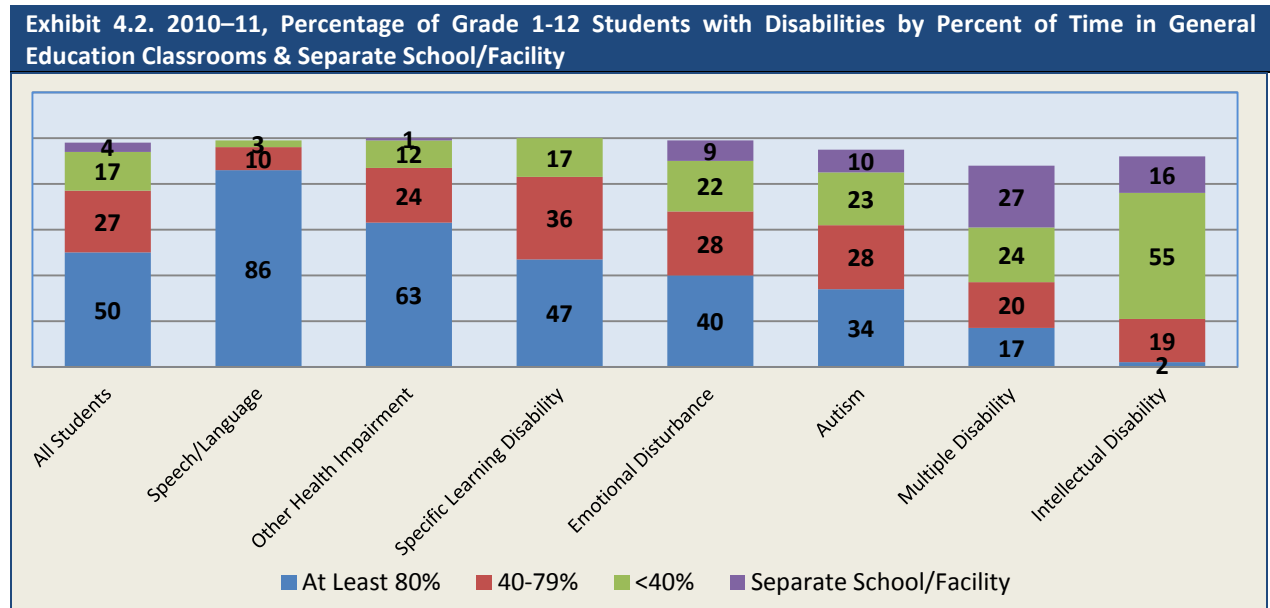
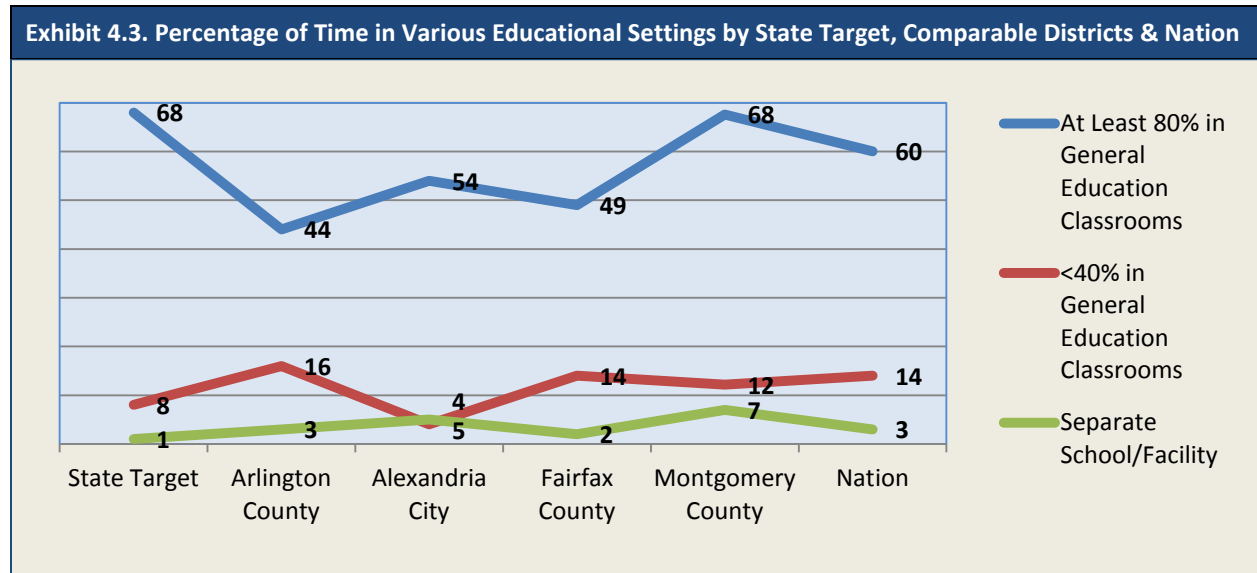


Exhibit 4.3 on the following page reflects data comparing percentages for the three educational settings targeted by Virginia’s State Performance Plan Targets and for APS, three comparable districts (Alexandria City, Fairfax County, and Montgomery County), and the nation.⁷³

- **At Least 80% of Time in General Education Classrooms.** Montgomery County has the highest percentage of students (68%) educated in this setting, followed by Alexandria City (54%), Fairfax County (49%) and APS (44%). The three Virginia districts educate a smaller percentage of students in this setting than the nation’s 60% and none meet the state’s 68% target.
- **Less than 40% of Time in General Education Classrooms.** Alexandria City has the lowest percentage of students (4%) educated in this self-contained setting, followed by Montgomery County, Fairfax County, and APS (12%, 14% and 16%, respectively); only APS is above the national rate of 14% and all but Alexandria City are above the SPP target of 8%.
- **Separate Schools/Facilities.** Fairfax County has the lowest percentage (2%) of students in this most restrictive setting, followed by APS (3%, which is the same as the national rate), Alexandria City (5%) and Montgomery County (7%). All of these rates are above the state’s SPP target of <1%.⁷⁴

⁷³ Data for APS and comparable districts: [Special Education Annual Performance Reports to the Public](#). Data for Montgomery County: 2010-2011 Maryland Special Education/Early Intervention Services Census Data & Related Table 16 Students with Disabilities by Least Restrictive Environment Ages. SPP targets: VA SPP. U.S. data: Data Accountability Center, Table 2-2 at http://www.ideadata.org/arc_toc12.asp#partBLRE. Data may slightly differ from exhibit to exhibit due to different sources.

⁷⁴ IDEA requires states to submit a performance plan that includes baseline data, targets and improvement activities for indicators developed by the United States Department of Education.



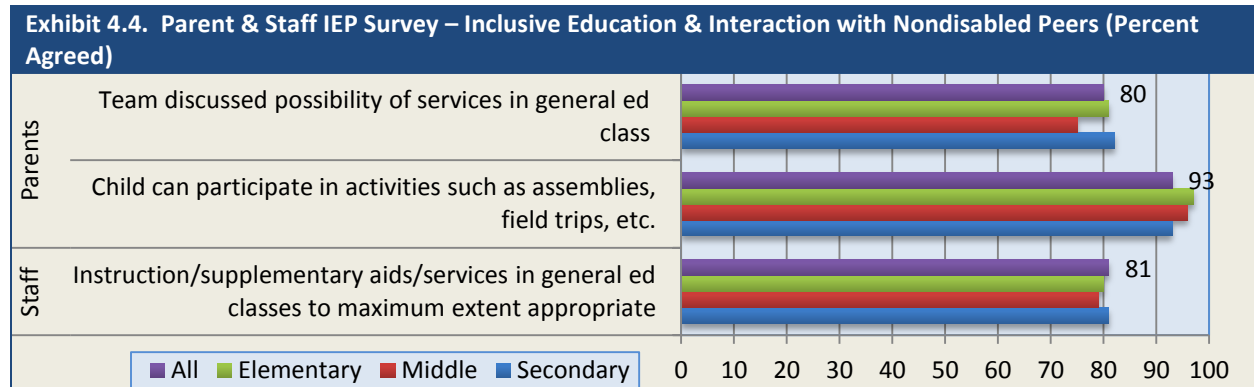
Effective Teaching & Maximized Learning in the Least Restrictive Environment

One advantage of No Child Left Behind is the focus on improved performance for subgroups of students that includes students with disabilities. With this focus came the realization, for some for the first time – that even with all the procedural safeguards that have been in place since the execution of the first federal special education law in 1975 – academic achievement and social/emotional outcomes have not improved as much as had been anticipated. The following information summarizes and assesses APS’s standards and practices in this area based on focus groups, case study reviews and additional surveys of staff, parents and students. See Appendix Z for detailed information about each of the surveys.⁷⁵

Supporting Instruction in the General Education Setting

As illustrated in Exhibit 4.4 on the following page, a high percentage of parents and staff agree that information is considered by IEP teams about the education of students with an IEP in general education classes and in activities with their nondisabled peers. In this respect, 80% of parent respondents indicated that teams discussed the possibility of a child’s education in general education classes; and 93% agree that their children can participate in activities such as assemblies, field trips, sporting events, etc. Similarly, 81% of staff respondents reported that students receive their instruction, with supplementary aids/services in general education classes to the maximum extent appropriate. These responses did not vary greatly by grade level.

⁷⁵ The following APS groups completed an on-line survey: 892 (30.2%) of staff working with students with IEPs; 364 (41%) high school students with IEPs; and 565 (19.1%) parents of students with an IEP.



Information from focus groups and case study reviews indicated that APS schools generally vary with respect to the extent to which students with disabilities are educated in general education classes. There was a belief that the use of differentiated instruction could be used more consistently across schools, and academic/positive behavior interventions could be used to a greater extent to reduce reliance on separate class instruction. The information below elaborates on this theme and presents additional areas for improvement.

Clear Vision & Expectations for Co-Teaching

While it is evident that the practice of co-teaching exists in APS, it does not appear as a districtwide strategy with clear expectations or directives for co-teaching.⁷⁶ As a result, its success is completely reliant on the willingness of school administrators to support its use. Each school tends to have its own model, even if the model relies less on support within general education classes and more heavily on the removal of students to special classes. There appears to be consensus that co-teaching occurs only when general and special educators want to work together and buy into the co-teaching philosophy, or rather that success occurred because of teacher inclination and not because of a leadership directive. In some schools there is a perception of hesitancy and “push-back” from both general and special educators for co-teaching. This behavior may be reinforced by the apparent lack of focus or emphasis on co-teaching in the district. One focus group member stated, “There are pockets of excellence, but it is not system-wide.” APS has laid a foundation for this inclusive strategy, but should now work to concretize expectations for practice.

The use of co-teaching also varies by grade level. Service support at the elementary level is viewed as more “fluid,” than at the middle or secondary school levels where the model seems to be “all or nothing” and is dependent on complicated scheduling of courses. Focus group feedback and survey data indicated that co-teaching appears to be more established in the elementary school setting than in the secondary grades.

Differentiation & Accommodation

When co-teaching is not in place, general educators’ willingness to accommodate students and work with special educators varies greatly. In some instances, there is a view that some general education teachers still see students with disabilities as “somebody else’s children.” There is the desire for the district to take a stronger stance in communicating that all children in the building are a part of the school and class community. Reportedly, it is sometimes difficult to get guidance from special educators

⁷⁶ Co-teaching involves general and special educators who conduct lessons in a general education class. Although there are various models, all of them include collaboration and communication about the needs of students and their respective roles.

about accommodations/modifications needed for students with an IEP as the educators are busy with their own caseloads, IEP paperwork and communicating with parents.

- **Elementary School Grade Level.** At the elementary school level, focus group participants perceive that differentiated instruction has become the norm. Elementary principals have stressed differentiation for not just students with disabilities, but also for ELLs and students who are gifted as well. The expectation is that difficulty, pace, content and test administration are all differentiated to best meet individual students needs. Teachers know that it is something that is looked for as part of the school walkthroughs. There are, of course, instances where it is believed that specific teachers or schools could use more guidance on specific instructional strategies or targeted support for reaching the needs of certain types of learners. Addressing the needs of students with autism was raised as a specific example.
- **Middle/High School Grade Levels.** There is the belief that differentiation is not as strong at the middle or high school level, and was more challenging for teachers as the content or SOLs increased in rigor. In particular, there was concern that general educators teaching students with Asperger's syndrome do not consistently understand the nature of the disability and may enact discipline or otherwise react to behavior related to the disability. Reportedly, professional development has been available to address this issue but given the voluntary nature of the activity, those with the greatest need do not tend to participate.

Content Knowledge

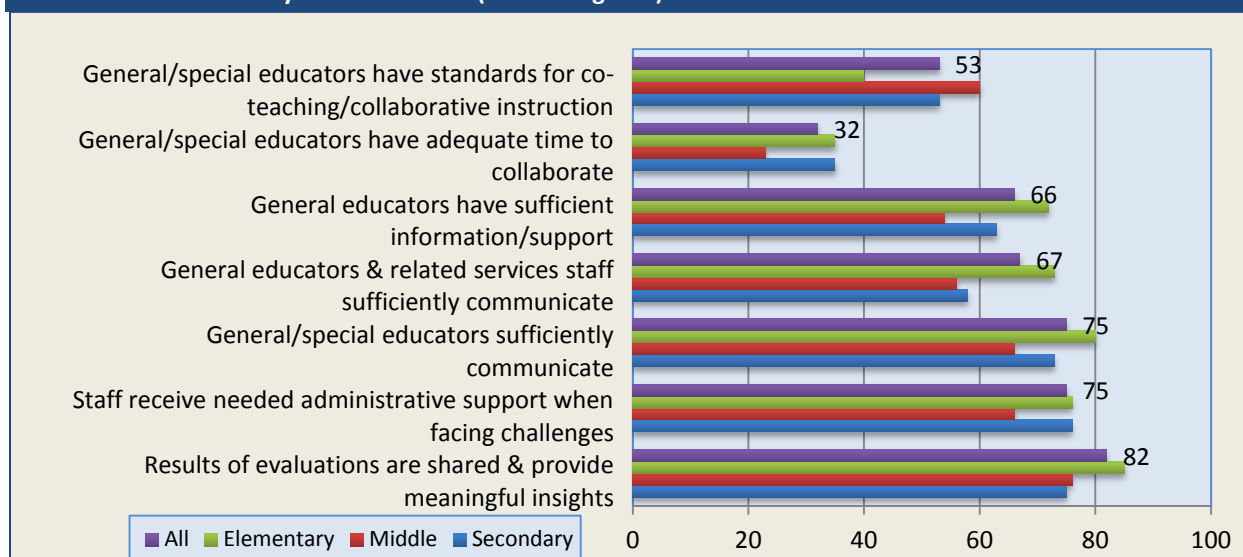
A common concern that is typical of those relevant to school districts across the country is the need for special educators who co-teach in core curricular areas to have more knowledge of the content, especially in the areas of reading, math and science. Content area knowledge is especially daunting for special educators required to teach more than one subject area. Although this issue is raised in relationship to co-teaching within general education classrooms, its importance is also relevant to instruction in separate classes. This is a particular problem when special educators teach several content areas. In recognition of this issue, APS has taken steps to hire dually certified teachers at the secondary school level.

Planning & Collaboration

Co-teaching works well when teams plan and collaborate. There was a perception, however, that collaborative planning most often occurred with a team's initiative, and not due to structures put into place by the district. Time for planning and collaboration was raised as a consistent barrier to developing true co-teaching partnerships and supporting effective inclusive instruction. For example, some teachers shared concern about not receiving information at the beginning of each school year regarding student needs. Having special educators participate in team and grade level meetings may help alleviate some of the communication barriers. This practice was reported in some buildings, but was not observed as a districtwide practice.

Staff survey respondents reinforced concerns related to collaborative practices. Although 53% indicated APS has standards for co-teaching or collaborative instruction, only 32% of them agreed they have adequate time to collaborate. Larger percentages agree that: general educators have sufficient information and support for students with an IEP in their classes (66%); general educators and related services staff sufficiently communicate (67%); and that general and special educators regularly communicate (75%). Further, staff indicated they receive administrative support when needed to address teaching challenges for students with an IEP (74%); and a high percentage (82%) agreed they receive evaluation results that provide meaningful insights about their students.

Exhibit 4.5. Staff Survey – Collaboration (Percent Agreed)



Research-based Intensive Interventions for Reading & Math

As was discussed in greater detail previously (Section 2. IATs: Administration & Implementation), APS’s intervention school survey reflects a lack of understanding about research-based interventions designed to significantly improve academic achievement and social/emotional learning for all students, including students with disabilities. Too often, learning accommodations/modifications and strategies were misunderstood to be research-based interventions for reading, in particular, and also for math. While intervention charts found on the district’s website included some intervention programs for reading and a fewer number for math, there was no evidence that these programs were available in sufficient numbers at every school. Contributing to this circumstance is the absence of a comprehensive system of interventions based on student targeted needs to escalate performance and reduce achievement gaps with nondisabled peers.

Professional Development

Reportedly, APS has not institutionalized in its professional development an emphasis on strategies for educating students with an IEP in general education classes with the supplementary aids and services they require for support. In the absence of such training and written guidance, there is a lack of clarity around issues, including co-teaching roles. For example, some focus group participants shared their belief that some special educators perceived their role to be limited to addressing student behavior and not to co-facilitate content delivery. Participants also shared their belief that ongoing professional development would help alleviate many of these misconceptions. In particular, teachers needed models to work towards and see true co-teaching in action through observations and demonstration classrooms. Interestingly, only 34% of teachers responding to the special education survey expressed a desire for more training on co-teaching and inclusion; but 64% of staff surveyed agreed that general educators need more focused training.⁷⁷ The largest area of interest for further training (44%) was to support positive student behavior, which influences the effectiveness of inclusive practices.

⁷⁷ 68% agreed PD sessions attended have been helpful.

Assistive Technology

Special Education’s website has extensive information about the use of assistive technology.⁷⁸ An eight person AsTech Team is posted with names and contact information; one individual is full-time and the others work on this issue part-time. In addition, the website includes: a full explanation of assistive technology, frequently asked questions, procedure for the referral of a student, and a brochure for parents in English and in Spanish. Although assistive technology is also a Section 504 service, and could be provided through an MTSS framework for students without disabilities, the website does not reference this possibility.

Focus group participants provided the following feedback regarding the process for a student to receive assistive technology, its availability and staff knowledge about this area.

- **Referral.** Although the assistive technology referral procedures and relevant information is available on-line, the process is not well known in the schools. When students are referred, the process is slowed down because of the high number of inappropriate referrals. A new referral form was initiated this fall to support an increase in appropriate referrals.
- **Access.** Access to assistive technology, including augmentative communication materials, varies by school. This variance is based on how staff members choose to spend the funds they receive for student materials, and the knowledge of the school’s speech/language pathologist. Although Student Services used IDEA American Recovery and Reinvestment Act (ARRA) funds to purchase a large number of assistive and other technology, there are concerns that APS may not have the equipment and materials needed to meet student need.
- **Backlog.** There was a backlog of assistive technology referrals caused by a vacant coordinator position and the subsequent hiring of a new staff member.
- **Training.** Training was cited as an area of need for staff and for speech/language pathologists to promote their understanding of this teaching and learning support.

Course Participation

This section analyzes the extent to which students with an IEP access rigorous secondary general education courses. APS provided PCG with a data file called “Course Participation” that contained student with IEP representation by course at the high school level. Students with an IEP make up 14.4% of the APS high school population. PCG used this information to determine the rates of students with an IEP having access to advanced level coursework, as defined by course title for APS’s 325 secondary courses. Generally, the data reflected the following:

- Students with an IEP only make up 3.4% of all AP and IB courses.
- Students with an IEP make up 4.2% of all HILT courses.

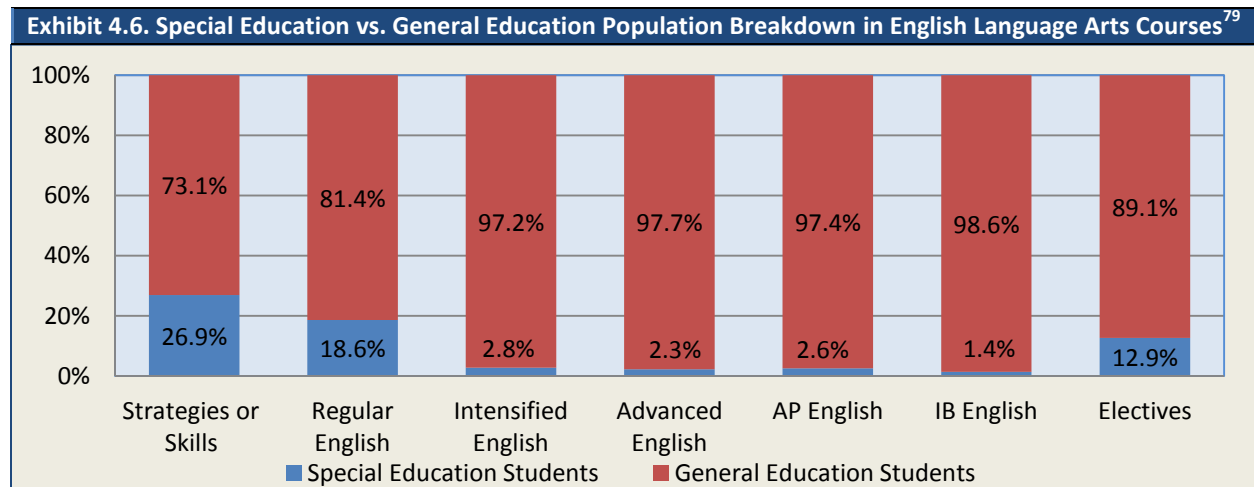
The sections below describe variances and trends pertaining to the enrollment of students with an IEP for English Language Arts, business, science, social studies and technology. Math coursework was not analyzed due to the different course titles by school and variation in grade level sequencing. From our data set, it was difficult determine when a student enrolled in a course. A student taking Algebra 1 in

⁷⁸ <http://www.arlington.k12.va.us/page/1739>

the 10th grade, for example, is likely on a more advanced academic path than one who enrolls in this course in their senior year.

English Language Arts

Exhibit 4.6 shows English Language Arts (ELA) courses by the percentage of students with and without IEPs. As expected, the trend was that as the level of rigor increases for ELA courses, the percentage of students with an IEP decreases. The strategic or skills courses had about 27% of students with an IEP and the Advanced, AP, and IB English courses had 2.3%, 2.6%, and 1.4% respectively.



Science Courses

Exhibit 4.7 below reports the Science courses offered at APS. It illustrates the same trend as the ELA courses where students with an IEP were less likely to enroll in AP or IB courses and more likely to enroll in courses like Applied Earth Science or Principles of Chemistry.

Exhibit 4.7. Science Classes⁸⁰

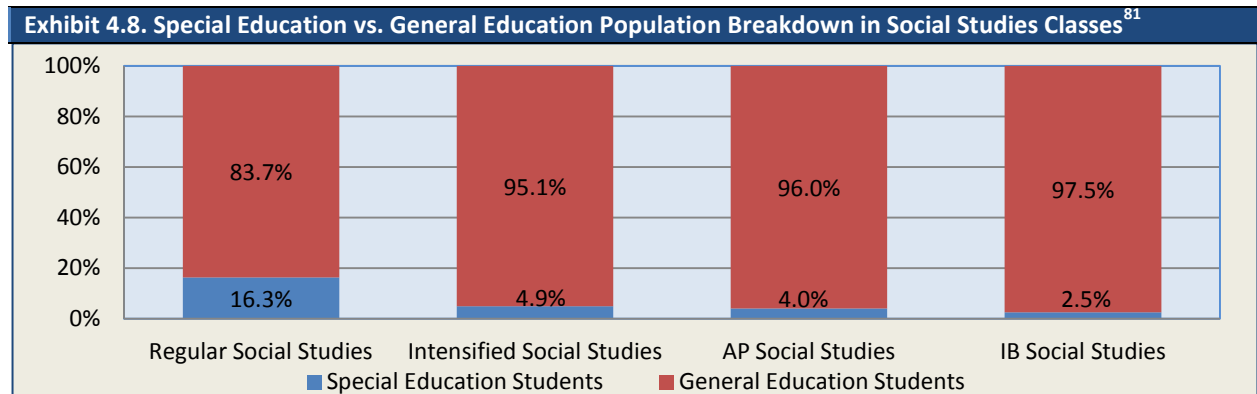
20% Or More Students With an IEP	4 Or Fewer Students With an IEP
Advanced Animal Science/Biology	AP Biology
Applied Earth Science	AP Chemistry
Biology II – Environmental	AP Environmental Science
Earth – Space	AP Physics B
Physical Science 8	AP Physics C
Principles of Chemistry	Geospatial Tools and Technology
Principles of Physics	IB Biology HL, Part I
Std. Biology	IB Biology HL, Part II
Technical Animal Science/Biology	IB Chemistry HL, Part I
	IB Chemistry HL, Part II
	IB Environmental Systems SL
	IB Physics SL, Part I
	IB Physics SL, Part II
	Introduction to Horticulture
	Physics, Intensified
	Robotics

⁷⁹ Courses with 1 student were assumed independent study and were not included.

⁸⁰ 96.3% of students in Applied Earth Science have IEPs.

Social Studies

Exhibit 4.8 below shows the breakdown of APS students with and without IEPs in Social Studies courses. There are 15 AP and IB courses offered in the Social Studies Department; of these, 10 courses had 0 students with an IEP enrolled. This pattern reflects the same trend noted above, where students with an IEP are less likely to enroll in the more rigorous courses. However the average number of students with an IEP enrolled in AP Social Studies is 4.0%, compared to only 2.6% in AP English Language Arts.



Business Classes

The data in the Exhibit 4.9 shows APS’s business courses, which include Accounting, Information Technology, and Business & Marketing. These classes offer a unique opportunity for students to learn different skills and may be more hands on, or allow students with an IEP to learn valuable skills in a different, non-traditional class atmosphere. Nine classes included 20% or more students with an IEP; and 12 included 3 students with an IEP or less. At the same time, there were some courses with 3 students or less with IEPs that could be better utilized for these students. For example, Cooperative Experience seems like a course that many students with an IEP could benefit from.

Exhibit 4.9. Business Courses⁸²

20% Or More Students With An IEP	3 Students Or Less With An IEP
Accounting Principles	Accounting Principles
Advanced Topics	Business and Information Technology Cooperation
Advanced Topics in Information Technology	Computer Information Sciences Program
Business and Information Technology Co-op	Cooperative Experience (Internships)
Business Computer Applications II	Design, Multimedia & Web Technology
Design, Multimedia & Web Technology	Game Design, Multimedia & Web
Introduction to Information Technology	IB Computer Science HL I
Multimedia I	IB Computer Science HL II
Personal Finance	IB Information Technology/Global Society
	Introduction to Information Technology
	Introduction to Business & Marketing
	Office Technology I/Writing

⁸¹ Courses with 1 student were assumed independent study and were not included.

⁸² This chart does not show all business courses, only those with either high or low participation of students with IEPs.

Technical Courses

As seen in Exhibit 4.10 below, APS provides a variety of technical classes. Students with an IEP were enrolled in the following number of classes at the rates included in the parentheses: 11 courses (20%); 7 courses (10-20%) and 0 courses (10% or less). Students with an IEP are less likely to take Engineering, Drawing, or computer-based courses like Computer Assisted Technical Drawing and Computer Graphics Web, and more likely to take auto, cosmetology, culinary, and carpentry classes.⁸³

Exhibit 4.10. Enrollment of Students With An IEP in Technical Classes
Classes Where 10% or Less Of The Students Enrolled Have An IEP: Architectural Drawing; Computer Assisted Technical Drawing; Electricity I; Engineering Drawing; Engineering II: Principles of Engineering; Engineering III; IB Design Technology; Physical Therapy Sports
Classes Where 10%-20% Of The Students Enrolled Have An IEP: Computer Graphics Web; Computer Assisted Architectural Drawing; Digital Photography II; EMT/Basic Anatomy; Engineering I: Intro to Engineering; Forensic Technology
Classes Where 20%-50% Of The Students Enrolled Have An IEP: Auto Body Remedial I; Auto Body Remedial II; Auto Technology I; Auto Technology II; Auto Technology III; Aviation Technology; Biotechnology Applications; Car Care; Carpentry II; Cosmetology I; Cosmetology II; Culinary Food Prep I; Culinary Food Prep II; Digital Photography I; Digital Visualization; Electricity II; TV Production I; TV/Multimedia Production
Classes Where More Than Half Of The Students Enrolled Have An IEP: Carpentry I

Supporting Instruction in Special Programs

According to APS's Continuum of Services Options-Vertical Planning Chart, students who receive special education services more than 15 hours each week are placed in a self-contained program.⁸⁴ This section provides information relevant to instruction provided through these programs.

Configuration of Special Education Programs

As with most school districts, APS has a service delivery system that is organized around specific programs, e.g., MIP-A, Functional Life Skills, Interlude, etc.⁸⁵ Typical of this configuration, programs are predesigned to meet a constellation of student characteristics and needs. APS's service model includes cross-categorical programs that are available in every school and 15 countywide programs, some of which have been expanded for the 2012-2013 school year.⁸⁶ If a countywide program is not available in a student's home school, (s)he is transported to another school that has the program. As the information and Exhibit 4.11 below reflect, the countywide programs available at the early childhood and school-aged levels are present at schools in varying numbers.⁸⁷ The amount of time students in these programs participate in general education classes varies by program and individualized student needs.

Overall, there is high respect for APS teachers, including those in countywide programs. They are viewed as committed and highly educated, with multiple certifications. Also, there is a perception that APS is

⁸³ APS did not provide data for classes taken by students with IEPs at the Career Center.

⁸⁴ [APS Continuum of Services Options- Vertical Planning Chart](#)

⁸⁵ Multi-Intervention Program for Students with Autism Spectrum Disorder

⁸⁶ Cross-categorical programs include students with IEPs who have different disabilities but similar educational needs.

⁸⁷ Data is based on information provided in APS's website: [Special Education – Countywide Programs](#).

known for its special education countywide programs, particularly in the area of autism, and that parents move from other school districts to enable their children to benefit from them. (Of the 345 parent survey respondents indicating they moved into the district, 17% reported that the district's reputation for providing special education services one of the reasons for their move.) It is believed that these programs have helped APS to reduce the need to send students to out-of-district placements. The following countywide programs received the highest accolades from staff and parents:

- **Multi-Intervention Program for Students with Autism Spectrum Disorder (MIP-A).** Designed to meet the needs of students with Autism Spectrum Disorders, the program focuses on communication, social skills, academics, and independent life skills.
- **Secondary School Program for Students with Autism (Asperger's).** This middle and high school program is designed to supplement the general education curriculum. Students are provided specific instruction in development of social skills, organizational skills, and a challenging academic experience.
- **Interlude.** Students struggling with emotional and behavioral challenges attend this program, which provides academic, clinical, therapeutic, interagency and family resources. Staff members are highly trained; and each class has a teacher, resource assistant, and therapist.
- **Functional Life Skills.** Designed for students with significant cognitive impairments coexisting with significant deficits in adaptive behaviors, the program includes a focus on functional daily living skills and communication.

Early Childhood

There are four early childhood programs (a two-year old program; three to five-year old program; and two programs for students with autism). The most common program is the one for three to five year olds that has one class in 14 schools and two classes in one school. At the time of this report, four schools (Arlington Science Focus, Patrick Henry, McKinley, and Nottingham) did not have any early childhood programs. This configuration appears to reinforce placement in separate classes rather than support within early childhood classes with nondisabled peers.

School-Aged

As reflected in Exhibit 4.11 on the following page, there are eight county special education programs for school-aged students, which provide services in 41 classes. The Interlude Program for students with emotional/behavioral challenges and the Elementary/Middle School Multi-Intervention Program for Students with Autism Spectrum Disorder (MIP-A) are the most common programs, along with the Functional Life Skills Program which has 13 classes. The 45-Day Alternative Program is a required alternative placement for students with disabilities who are suspended due to drugs, weapons, and alcohol. It is a requirement, not a choice program the division has to offer.

Exhibit 4.11. Number of Special Education Programs by School & Program Type⁸⁸

Programs	Early Childhood					School-Aged								
	Two Year Old Toddler Program	Preschool Multi-Intervention Program for Students with Autism Spectrum Disorder	Pre-Kindergarten Autism Class (PAC)	Three-Five Year Old Program	TOTAL EARLY CHILDHOOD	Interlude	Communications	Functional Life Skills Program	Elementary and Middle School Multi-Intervention Program for Students with Autism Spectrum Disorder (MIP-A)	Deaf/Hard of Hearing	Twice Exceptional Program	Experienced Based Career Education	SWAT	TOTAL SCHOOL-AGED
Abingdon				1	1				1					1
Arlington Traditional		1			1									0
Ashlawn	1				1			1						1
Barcroft				1	1			1						0
Barrett				1	1									1
Campbell				1	1									0
Carlin Spring				1	1									0
Claremont	1				1									0
Drew Model				1	1				1					1
Glebe				1	1			3						3
Henry					0		1			1				2
Hoffman-Boston		1	1	2	4				1					1
Jamestown				1	1				1					1
Key				1	1									0
Long Branch		1			1									0
Oakridge				1	1	1								1
Randolph				1	1									0
Reed	1	1		1	3									0
Taylor				1	1				1					1
Tuckahoe				1	1									0
Gunston MS						1		1						2
Jefferson MS						1		1						2
Kenmore MS						1		1	2					4
Swanson MS						1								1
Williamsburg MS						1		1						2
Langston HS														0
Wakefield HS						3		1	1		1			6
Washington-Lee HS						3		1						4
Yorktown HS						3		2						5
Career Center												1	1	2
TOTAL	3	4	1	16	24	15	1	13	8	1	1	1	1	41

⁸⁸ This data is based on APS Continuum of Services Options- Vertical Planning Chart. The table does not include the Asperger's program because school locations had not been determined and were not listed on the Vertical Planning Chart.

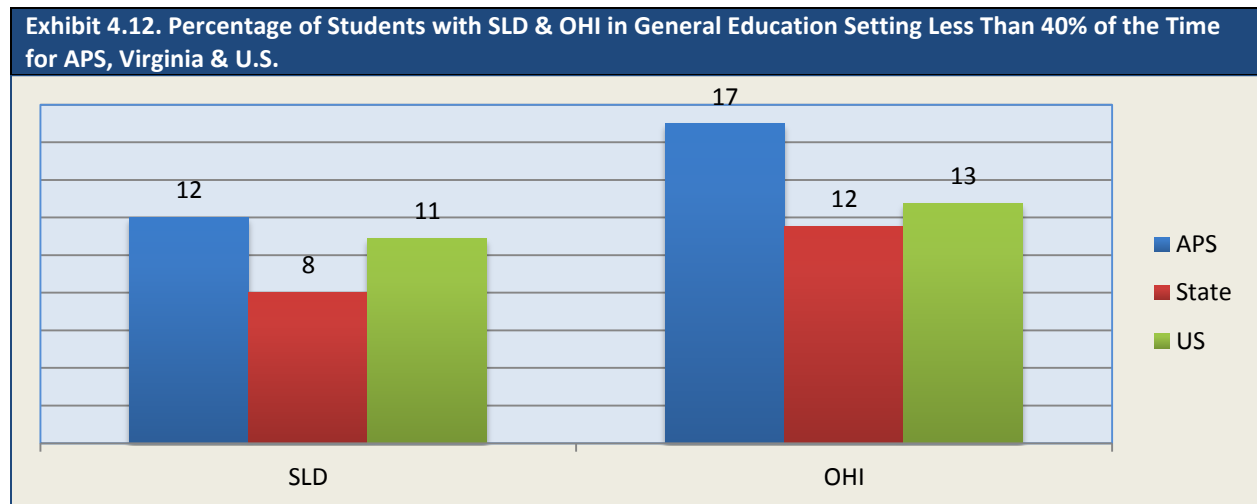
Specialized Instruction for Students with SLD and OHI

According to the APS website that describes the countywide programs, none have curriculum designed specifically for students with SLD or other health impairment (OHI). When educated in a self-contained program, these students are most commonly placed in cross-categorical special education classes located in each school. Students with other disability areas are also educated in these settings when appropriate.

Data for percentage of time students are educated in general education settings less than 40% of the time reflects most of the students who are educated in self-contained programs.⁸⁹ As shown in Exhibit 4.12 below:

- **SLD.** The percentage of APS students educated in this setting (12%) is 1 percentage point higher than the U.S. (11%) and 4 points higher than Virginia (8%).⁹⁰
- **OHI.** The percentage of APS students with OHI educated in this setting (17%) is 5 percentage points higher than Virginia (12%) and 4 points higher than the U.S. (13%).

Given that these students almost always participate in SOLs, it is essential for them to access the core curriculum in a meaningful way in order to have an opportunity to meet established standards. As discussed above, instruction in general education classes with appropriate supplementary aids/services provides the most effective access to the core curriculum. As appropriate, this instruction may be reinforced through interventions and support provided in separate classes for 80% or less of the time.



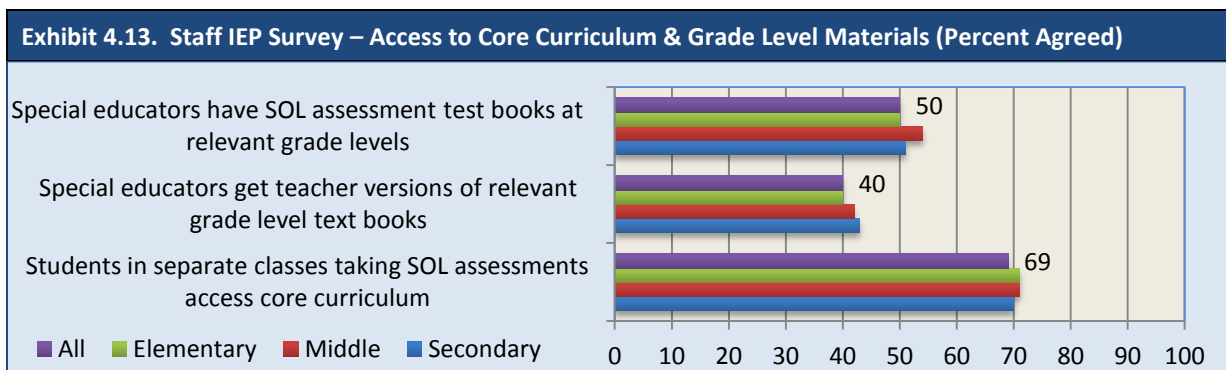
⁸⁹ The category of students educated in general education 79% to 40% of the time also includes some students in self-contained programs, e.g., in general education 50% of the time. Because it is not possible to disaggregate students educated in general education 50% to 40% of the time from this data group, that category is not included for this discussion. Note that the educational setting categories are set by the U.S. Department of Education and are based on the percentage of time students with disabilities are educated with nondisabled peers in the general education environment.

⁹⁰ Virginia and U.S. data is based on the U.S. Department of Education's 9th Annual Report to Congress for Special Education (Fall 2005 data) at Volume 2. This is the latest data for educational settings by disability area. The trend has been for growth in less restrictive settings over time. See <http://www2.ed.gov/about/reports/annual/osep/2007/parts-b-c/index.html>.

Implementation Issues

Information from focus group and case study review participants reflected areas for improvement with respect to the provision of educational services to students in special education programs.

- **Access to Core Curriculum.** Especially, but not only at the elementary level, students in a special class are in multiple grades, making it more difficult to provide access to each student’s grade level core curriculum. One example was provided for a class with students from kindergarten through fourth grade. Providing access to grade level curriculum for students in each of these grades would be challenging for the most experienced teachers. According to focus group participants, access to grade level curriculum for students in special classes most of the school day varies greatly across the district and impacts their performance on SOLs. As illustrated in the exhibit below, 69% of staff survey respondents agreed that students in separate classes taking SOL assessments received instruction based on the core curriculum; only 40% agreed that special educators receive the teacher versions of relevant grade level text books and that half receive SOL assessment test books at their students’ relevant grade levels. These rates were constant across grade levels.



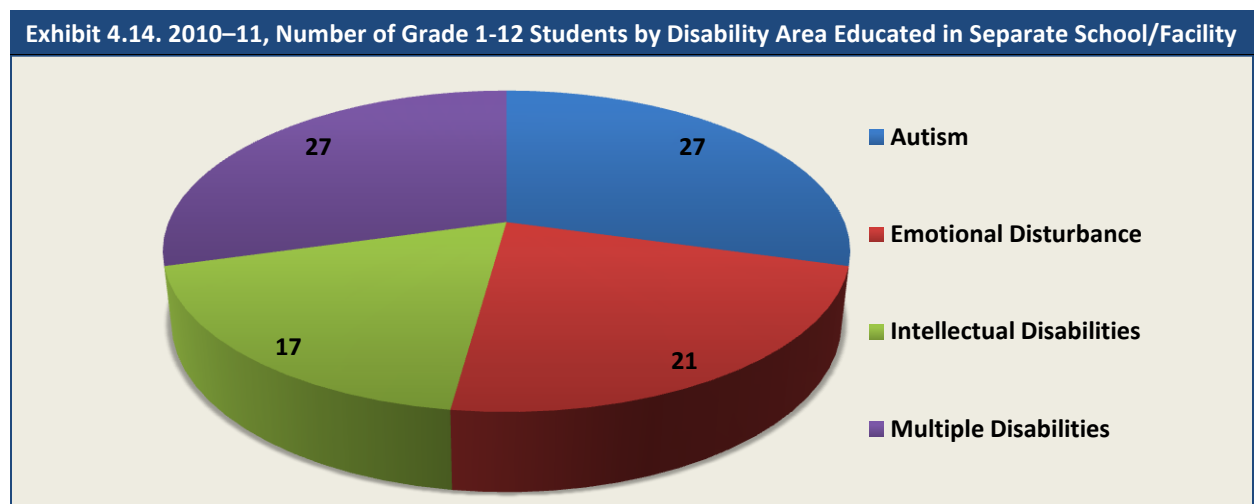
- **Reading Interventions.** Typically, students are removed from general education classes because their reading levels are significantly below their peers. Focus group participants expressed concern that effective reading instruction is not possible with the number of students in cross-categorical classes. However, students in cross-categorical classes can be provided small group reading and/or math interventions targeted to improve performance as a supplement to general education differentiated instruction provided during the remainder of the day. This model depends on access to research-based interventions and an operational structure that supports their effective delivery.
- **Flexible Grouping.** In some cases, participants shared that no APS “program” was appropriate for a specific student: those available were either for “lower” or “higher” performing students. In such cases, services were not discussed in terms of meeting the needs of the student; rather the discussion was based on the “program” with preexisting parameters in which the student would fit best. Fluid and flexible grouping between programs and general education instruction does not appear to be a consistent available option.
- **Social Skills Instruction.** There was concern that social skills instruction is not available for students with autism unless they are in a specialized program; there are also other students (with and without disabilities) who would benefit from social skills instruction if it were available.
- **Expanding Expertise.** There was recognition that many teachers in special programs have a high level of expertise. However, there has not been a structured opportunity for them to share their

knowledge with other special/general educators who would benefit from training for students who are not in those programs yet have similar needs, e.g., students who are not in MIP-A but have a need for social interaction and language skills, etc.

- **Expanding Instructional Expertise.** The teachers and coordinators who staff the MIP-A program are viewed as having a great deal of expertise in the area of autism. The district's partnership with the Autism Center for Excellence at Virginia Commonwealth University, involvement of behavioral specialists, support for parents, and team approach contribute to its high regard. There is concern, however, that the expertise of the staff and the program's evidence-based practices have not been made more available (through training, etc.) for students with a disability in another area but having similar needs or for students with autism who are not in the program.
- **Classes at Capacity.** Many focus group participants shared a perception that the special programs, e.g., MIP-A, Communications, and Stratford, were frequently at capacity and unavailable for recommended students. According to coordinators of special education, the programs are never full and accommodations can be made. There is an apparent disconnect between the field and special education administration regarding their perception of this issue.
- **Functional Life Skills Program.** Concerns expressed about this program focused on perceptions that it overemphasized functional skill development.
- **Interlude.** Designed with a support structure of individual and group therapy, daily instructional studies class and interaction with outside agencies, the program enables students to receive primary instruction in general education. Although concern was expressed that African American students are overrepresented in the program, there is a perception that students in the program perform well and that few drop out of school. PCG did not receive data for the program by student race/ethnicity or performance.

Separate Schools

In 2010-11, 92 APS students were educated in separate schools/facilities: 27 (29%) with autism and with multiple disabilities; 21 (23%) with ED; and 17 (18%) with intellectual disabilities.



As mentioned above, APS's 3% separate school rate is above the SPP target of 1% but is the same as the nation's 3% rate. Thus, the rate is not very high but above state expectations.

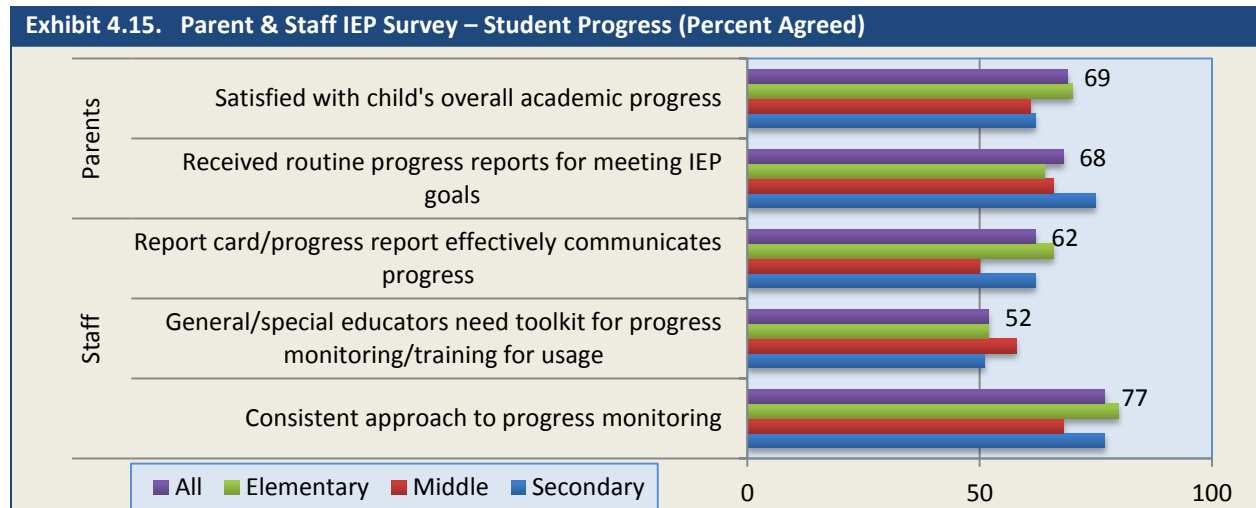
Reportedly, APS’s placement of students in separate schools, which are privately operated, tends to occur for students with more aggressive behavior. APS’s goal is to have the students return to the district as soon as possible; at the high school level, partial day placement is an option. There is concern that students are exhibiting aggressive behavior at younger ages, including those in PK programs, and mental health issues are more severe. It does not appear that APS over relies on private placements and, with the Interlude Program, is taking steps to support these students.

General Operation of Special Education

The following areas were assessed regarding the general operation of special education: progress monitoring; CLASS observation; post-secondary transition and activities; and parent and student feedback.

Progress Monitoring

The area of progress monitoring for students was discussed in Section 2 with respect to students with IAT. This discussion is as relevant for students with an IEP. As reflected in the exhibit below, 77% of staff respondents agree that APS has a consistent approach to progress monitoring; but 52% reported that general and special educators need a toolkit for progress monitoring and training for its usage. Also, 62% indicated that the use of report cards and progress reports effectively communicate progress to parent and a higher percentage of parents (68%) agreed that they received progress reports for their child’s IEP goals. Finally, a fairly high 69% of parents are satisfied with their child’s overall academic progress.



CLASS Observation

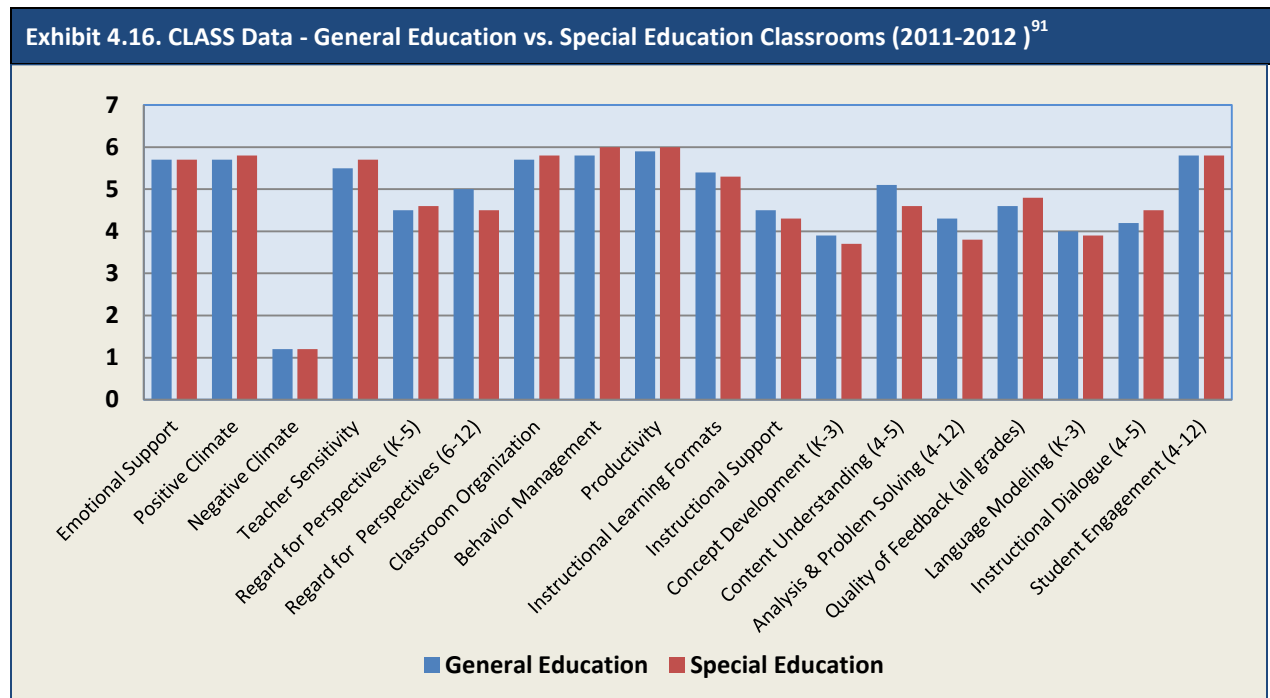
The Classroom Assessment Scoring System (CLASS) is an observational tool that was developed at the University of Virginia’s Curry School of Education. It is based on the idea that interactions between students and teachers are the foundation of student development and learning and aims to break down the complex classroom environment in order to help educators increase the effectiveness of their interactions with all types of student learners. The CLASS uses four domains (Emotional Support, Classroom Organization, Instructional Support, and Student Outcomes) to assess and measure the quality of teachers’ social and instructional interactions with students as well as classroom productivity. The CLASS tool was adopted by APS in 2009 in order to evaluate programs in the district. It was

administered during both the fall and spring semesters of the 2011-2012 school year. PCG examined over 1,300 records; pertinent data is summarized below.

General Education vs. Separate Classroom Setting

PCG compared observational data for teachers who were observed in the general education setting and teachers who were observed in a separate class for students with an IEP. All teachers were scored on each CLASS category using a 7-point range with scores of 1 and 2 representing low scores and 6 and 7 representing high scores. Scores across each category were averaged to come up with the data below, which shows the average score for each variable. Exhibit 4.16 below compares data from general education classrooms with special education classrooms and reflects the following:

- General education and special education teachers received mid to high-level scores on each of the variables assessed by CLASS. Classroom interactions between teachers and students appear to be relatively consistent in both settings.
- Quality of instruction and teacher interaction with their students appears strong regardless of instructional setting, based on this observation tool.

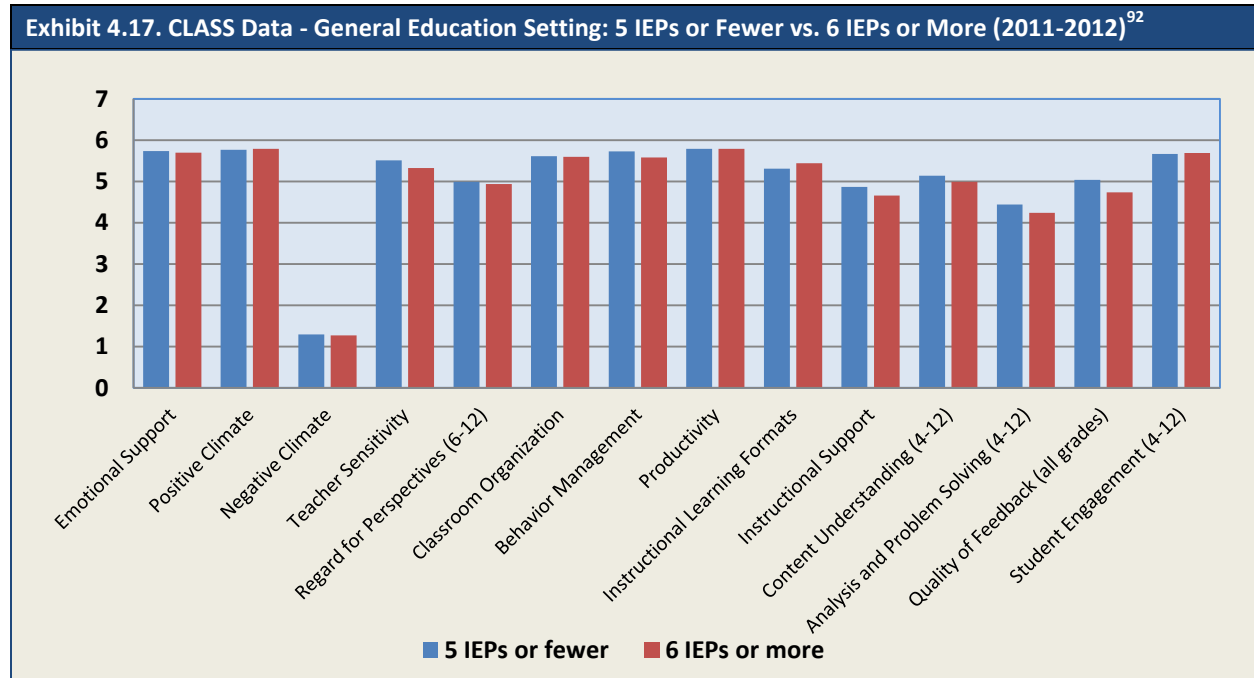


General Education Classroom with 5 IEPs or Fewer vs. 6 IEPs or More

PCG reviewed data to determine if the number of students with an IEP in a general education setting impacted teacher ratings. We first compared the CLASS scores for general education classrooms that had 5 or fewer students with an IEP to classrooms that contained 6 or more students with an IEP. The data shows that much like the comparison between general education and self-contained classrooms, teachers in classrooms with 5 or fewer IEPs and teachers in classrooms with 6 or more IEPs earned similar scores across all categories measured by CLASS. The presence of students with an IEP in the general education setting appears to have no impact on teacher interaction with students. Taking the

⁹¹ Source: Arlington Public Schools CLASS Results 2011-12 Fall & Spring

analysis a step further, PCG reviewed data to determine if there was a difference in classroom instructional interaction when roughly half of the general education class was students with an IEP. The following exhibit compares classrooms in the general education setting that had 10 students with an IEP or fewer to those classrooms with 11 or more students with an IEP.



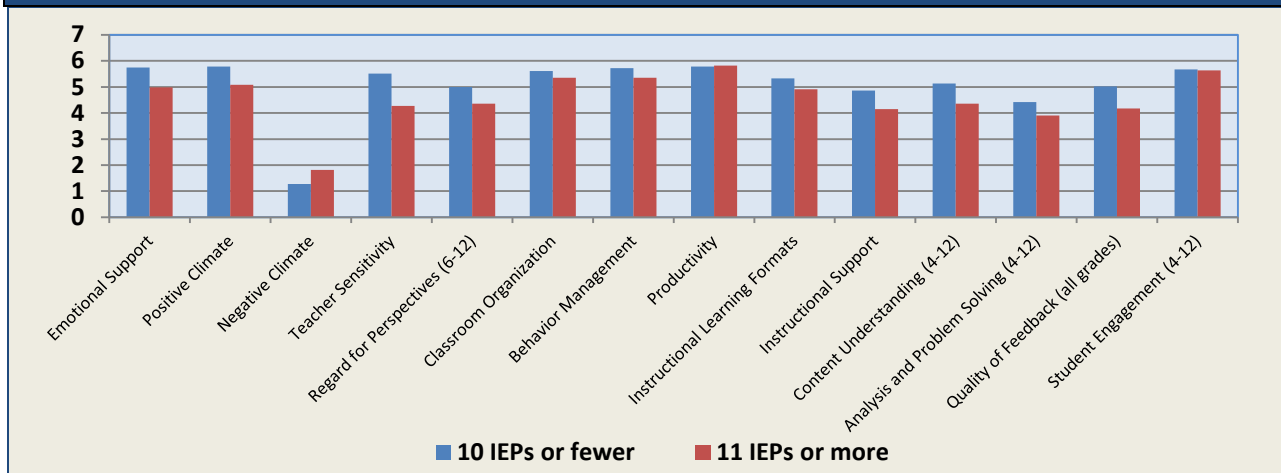
General Education Classroom with 10 IEPs or Fewer vs. 11 IEPs or More

Exhibit 4.18 on the following page demonstrates the following:

- When compared with classrooms with 10 IEPs or fewer, classrooms with 11 IEPs or more earned consistently lower scores. Teacher Sensitivity was the category with the biggest difference in scores, followed by Quality of Feedback, Content Understanding (4-12), and Emotional Support, and smaller but less interactive ratings in other areas as well.
- The Negative Climate category was the only category where classrooms with 11 or more IEPs had a higher score; however, this is not a positive rating and reinforces the above finding that settings where more than half of the students have an IEP have less effective instructional interactions.
- Though classrooms with 11 or more IEPs saw a decrease in scores in categories such as Teacher Sensitivity, Positive Climate, and Instructional Support, the scores for Productivity and Student Engagement remained fairly consistent.

⁹² Source: Arlington Public Schools CLASS Results 2011-12 Fall & Spring, (This data reflects secondary classrooms only) Same for Exhibit 4.15.

Exhibit 4.18. CLASS Data - General Education Setting: 10 IEPs or Fewer vs. 11 IEPs or More (2011-2012)



Although CLASS data captures many important areas relevant to teaching and learning, there are several important components that are not included: access to core curriculum, differentiated instruction, accommodations and modifications, use of effective interventions for reading and math, use of data, and monitoring student progress. These components are relevant for all students, and especially those for students with special needs. In addition, CLASS data does not address the area of co-teaching, which has important implications for students with an IEP and benefits all students. Finally, data does not include fields for disability or program type, which would facilitate further disaggregation of data.

Post School Transition Activities & Services

The Virginia State Department of Education defines transition services as "a coordinated set of activities for a student with a disability that is designed within an outcome-oriented process that promotes movement from school to post-school activities including postsecondary education, vocational training, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation." Transition planning begins in grade 8 or at age 14, whichever comes first.

Transition Coordinators

Transition coordinators are available to all high schools to provide technical assistance and support for the transitioning needs of students with disabilities. High school teachers reported relying heavily on the knowledge of these individuals to help determine meaningful and appropriate transition activities for their students. APS provides a number of transition options to students and the transition coordinators seem to play a critical role in helping support these activities. A transition council meets on a quarterly basis to discuss issues and coordinate transition activities. One of the transition coordinators who participated in the case study focus reviews was exceptionally knowledgeable.

Career Center

Focus groups and case study review participants spoke highly of the quality and diversity of courses offered at the Career Center. The Center enables students with an IEP (along with their nondisabled peers) to have varied opportunities to explore a variety of career choices and to engage in learning in a hands-on, real world environment. By being located in its own facility, it also affords students the opportunity to demonstrate independence. There was some concern, however, that Career Center

personnel do not address students' social/emotional needs to the same extent as personnel at home schools.

Students who participated in the student focus groups were fully aware of the Career Center, knew how to enroll in a class, and most had enrolled in at least one class. Many students were also able to articulate future classes that they planned to take. They found the courses engaging and valuable in helping them explore career choices. One student did note that she wished there were more options for those students interested in the visual arts.

Transition Activities & Options

Case study review participants identified the following transition activities as being in place:

Self-determination/Self-advocacy	Career Awareness/Career Development
Vocational Evaluations & Trainings	Independent Living/Community Participation
Learning Styles	IEP Training
Employment & Continuing Education Options	College Applications
Resumes, Job Applications & Interviewing Skills	Connections to Community Resources
Job Shadowing/Internships/Apprenticeships	

Transition Options

APS offers the following post-secondary transition options to students.⁹³

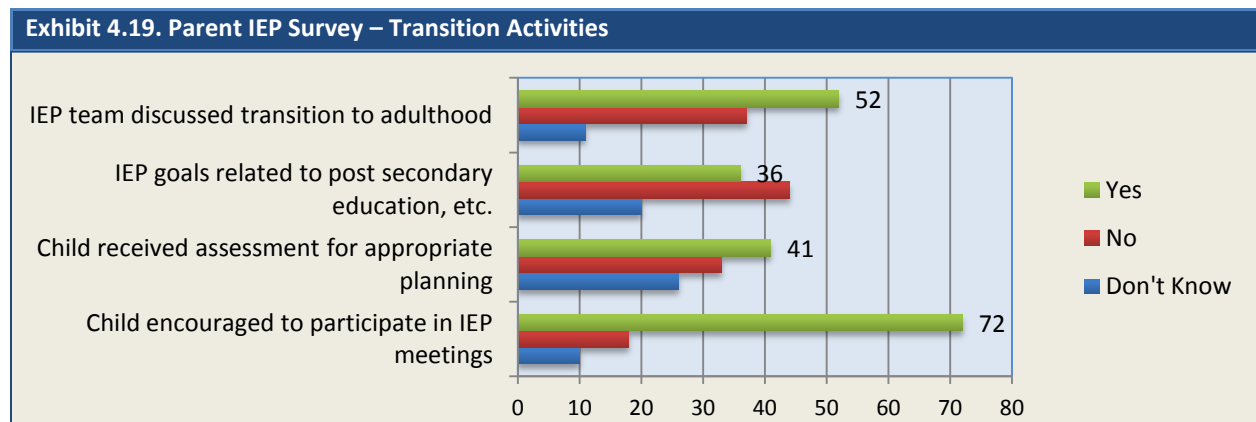
- **The Career Assessment Program for Students with Disabilities** is a highly individualized set of interest inventories, standardized tests and exploration activities designed to build a comprehensive picture of a student's interests, aptitudes, employability behaviors and career-decision making skills.
- **School-Based Career Assessments** is offered by Transition Coordinators at each high school to provide simple career interests and aptitude reviews to assist students in selecting fields of exploration or training.
- **Project PERT - (Post -Secondary Education/ Rehabilitation and Transition, @ Woodrow Wilson Rehabilitation Center, Fishersville, VA)** provides high school students with disabilities age 16 and older with a 12-day comprehensive assessment of vocational, independent living, and recreational skills. Project PERT staff make recommendations for short and long-term goals for students to maximize their independence potential.
- **Department of Rehabilitative Services Employment Evaluations** provides employment assessment opportunities to eligible students getting ready to graduate from high school and enter employment.
- **The Occupational Training/Education for Employment Program**, a class at the Arlington Career Center, includes activities to develop and strengthen employability behaviors, positive work attitudes, interpersonal and co-worker relationships, and social and independent living skills.
- **Functional Life Skills Programs**, programs for students with disabilities that are available in each middle and high school and provide various skill development activities to increase career/technical integration, social competence, community integration, personal growth, health and fitness, domestic living, and functional academic skills.

⁹³ PCG did not assess the effectiveness of these programs.

- **The Experience-Based Career Education Program (EBCE)** provides students with a combination of academic preparation and unpaid career explorations at work sites in the community. EBCE is open to students with an IEP who are in their last year or two of high school, can function independently at community work sites, and who are able to take public transportation independently after minimal training.
- **Supported Work and Transition Program (SWAT)** is open to students in their last few years of high school who are in need of support to explore career options and learn to use public transportation. SWAT offers students a combination of functional, community-based academic skills and unpaid career exploration experiences in the community.

Post-secondary Transition Planning

The responses of surveyed parents with students at least 14 years of age reflected several concerns with APS’s process for planning transition services and activities. As illustrated in Exhibit 4.19 below, about half (52%) of the parents indicated that their child’s IEP team discussed transition to adulthood (11% did not know); 36% reported their child’s IEP had goals related to required transition considerations; and 41% agreed that their child received an assessment to support transition planning. A higher 72% reported that their child was encouraged to participate in IEP meetings.



Focus group and case study review participants provided the following feedback about APS’s transition planning and activities.

- **Middle School Planning.** There is not much evidence of transition activity at the middle school level. As one middle school teacher noted, “We can’t add much to this section. It is really something one deals with in high school.” Post-secondary transition planning becomes stronger as a student approaches graduation..
- **Nontraditional Transition Programs.** There was recognition that the EBCE and SWAT programs provide excellent support for the students they have traditionally served. However, a number of participants shared their concerns that these programs and others do not address the needs of students with autism who require a different approach to transition activities, such as access to courses that have an informational technology or digital approach and require repetitive data work that may be done without much social interaction. While planning is underway to address the large number of elementary and middle school students with autism, there is frustration that support is not available for current secondary school students with autism.

- **Automotive Program Model.** The automotive program is considered to be one of the best programs for students with an IEP, although it was recognized that there is room for improvement. Personnel take student abilities into account when issuing grades, and competency assessments are based on student IEPs. Internships are available that have led to post-secondary positions.
- **Transition Plans.** Based on the case study review process, transition plans were not comprehensive and detailed.

Parent, Staff & Student Perspectives

The special education process can be an emotional and intimidating process for many parents. Clear and meaningful communication between the school/ district personnel and parents can help to build parent engagement and a trusting, collaborative relationship. Parents noted a higher degree of satisfaction with their child's education when they were able to communicate effectively with teachers and other school personnel. However, parents and school personnel spoke frequently about challenges associated with effective communication to support students with special needs.

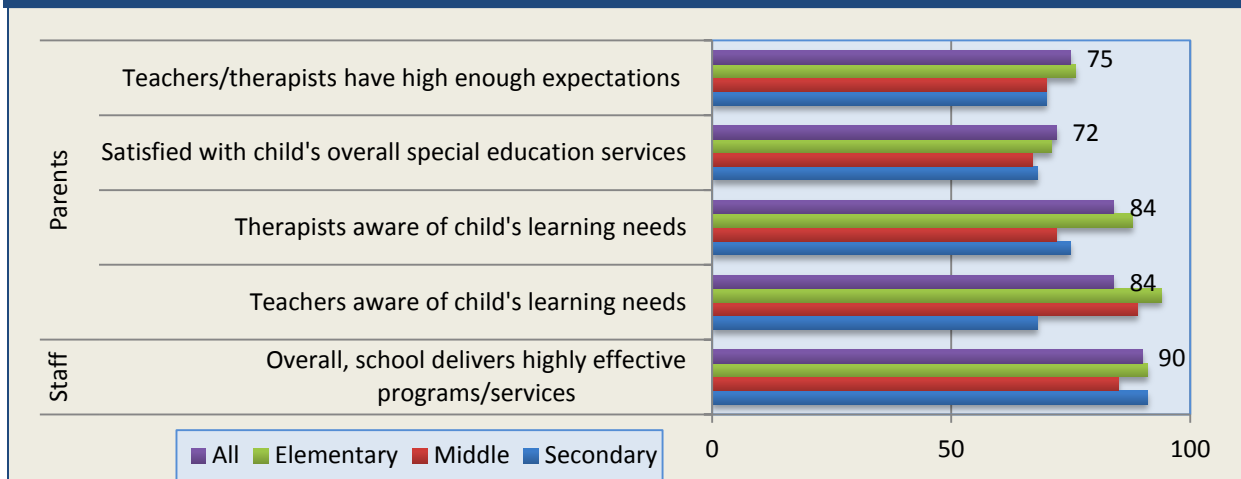
At times parents felt like they were getting detailed information, while in other instances sufficient information was lacking. Some principals, parents noted, made parents feel very welcome, while others came off as less receptive and engaging. Parents found that Blackboard was a valuable communication tool, but teachers did not use it consistently. Similarly, GroovyToo.com is another tool that one school uses. Parents would like APS to have schools identify a communication tool and have teachers expected to use it consistently. This process would help parents to have reasonable expectations about this type of communication and facilitate the exchange of information with teachers.

A high percentage of staff survey respondents believe there is a high level of communication and collaboration with parents in the evaluation and IEP planning process.

- 96% of the total staff respondents felt that parents are given the opportunity to participate as partners in evaluating their child's needs, and are encouraged to participate in making decisions about their child's educational programs and services.
- 94% also felt that their school effectively responds to the needs and concerns of parents of children with disabilities, and 92% felt that parents and families valued their opinions.

Generally, 72% of parents agreed that they are satisfied with their child's special education services; 84% reported that their children's teachers and therapists are aware of their child's learning needs and 75% reported that they have sufficiently high expectations of their children. A higher percentage of staff (90%) agree that schools deliver highly effective programs/services.

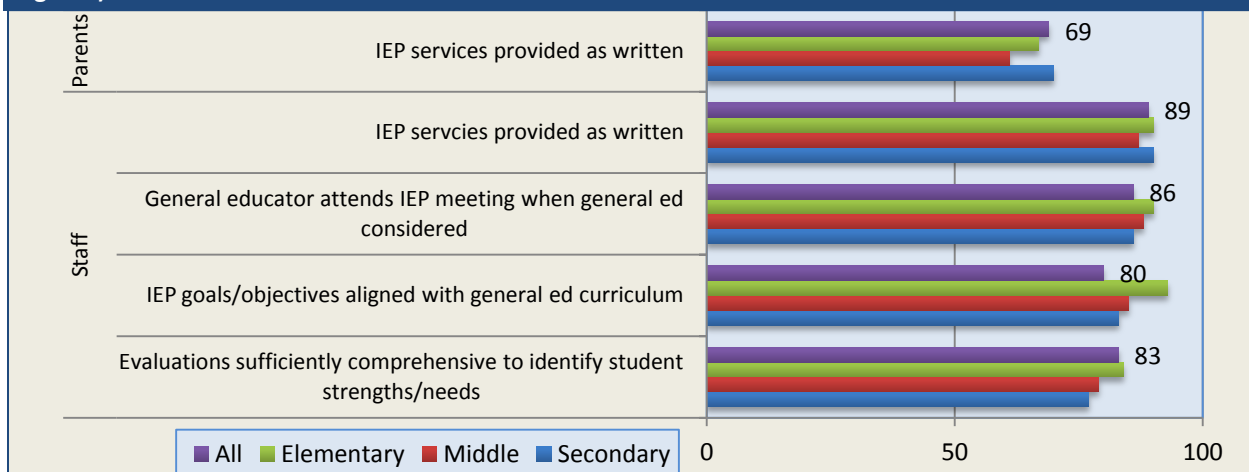
Exhibit 4.20. Parent & Staff IEP Survey – Overall Satisfaction (Percent Agreed)



As illustrated in Exhibit 4.21 below, in most areas below there is a high rate of parent and staff approval with respect to various evaluation and IEP processes:

- 83% of staff agreed that evaluations are sufficiently comprehensive to identify student strengths and needs; 80% agreed that IEP goals/objectives are aligned with the general education curriculum; and 86% agreed that general educators attend IEP meetings when relevant issues are considered.
- The agreement rates for staff and parents varied when addressing whether services are provided as written in IEP plans: 89% of staff agreed compared to 69% of parents.

Exhibit 4.21. Parent & Staff IEP Survey – Comprehensive Evaluations, IEPs & Implementation (Percent Agreed)



IEP/Placement Decision-making Process

Parent participation in IEP/placement decisions and the outcome of those experiences seems to vary by school. Based on focus group and case study review information, there was a noted lack of consistency in how schools seem to engage parents and how the eligibility process unfolds. Parents suggested that the lack of a clearly defined, centralized process allows for school leaders and teams to create site-based processes that lead to markedly different decisions about eligibility and services.

Some teacher focus group participants expressed frustration that some parents had undue influence over the IEP team. The record review group observed this phenomenon several times during the student file reviews. For example, one student received significant testing accommodations that did not appear to be founded based on documentation and other information available. In another, a student was determined to have a disability area based on the parent's influence so that the student could enroll in a highly desired middle school. Reportedly, more knowledgeable parents may take steps to access schools with more engaging and supportive principals and/or are better able to influence decision-making for their own or other children. PCG notes, however, that it is appropriate for parents to pursue decisions for their children they deem appropriate and that teams are accountable for the decisions they make.

A significant number of parents shared their belief that school personnel did not respond at all or sufficiently to the needs of their children and that eligibility decisions were delayed, incorrect, or resulted in a denial of eligibility. Other parents noted their child's eligibility meeting felt more like a "briefing" than a discussion, and they believed that the school team had pre-conceived notions about the meeting's outcomes.

Dispute Resolution

APS has a district compliance coordinator and also has one county attorney for special education legal matters, among other things. The attorney is employed by the county and also serves as the attorney for the School Board. According to district staff, the attorney never attends IEP meetings. Administrators are likely to get involved as soon as a potential conflict arises. For the most complicated cases, the Special Education Director will attend the meeting. District, school leaders and parents agree that the district strives to avoid litigation whenever possible. APS reported to PCG that the district has had only six due process hearings in the last five years (2007-2012).

These efforts were viewed as either a positive or negative attribute of the district, however, depending on the individual's vantage point. Parents believe the number is low because of APS's power of persuasion; some district personnel believe it is because administrators will compromise unnecessarily. Some parents referenced district "intimidation" tactics and know parents who elected to pay for private schooling for their children rather than "fight." Others noted that it could get "nasty." Administrators agreed that at times meetings could become contentious, and that they believe more parents were bringing outside advocates and lawyers to IEP meetings.

Both survey respondents and APS focus group participants addressed disagreements between parents and schools in the development of IEPs and discussion of placement. Of the 547 parent survey respondents, 41% indicated they had disagreements with their child's school on issues related to eligibility, placement, goals, services or implementation. Of these 249 respondents, 27% did not feel respected by the school and 43% were not satisfied with the outcome. This data is consistent with responses from 876 responding teachers where 43% agreed there have been disagreements between parents and schools in the planning and placement process (22% not available - NA) and 53% were satisfied with the attempt to resolve the disagreement (34% NA).

In spite of the strong collaboration PCG witnessed between APS and parent representatives during the course of this review, there is mistrust and strong feelings that interfere with consistent school-based staff/parent collaboration.

Student Experiences with IEP Process

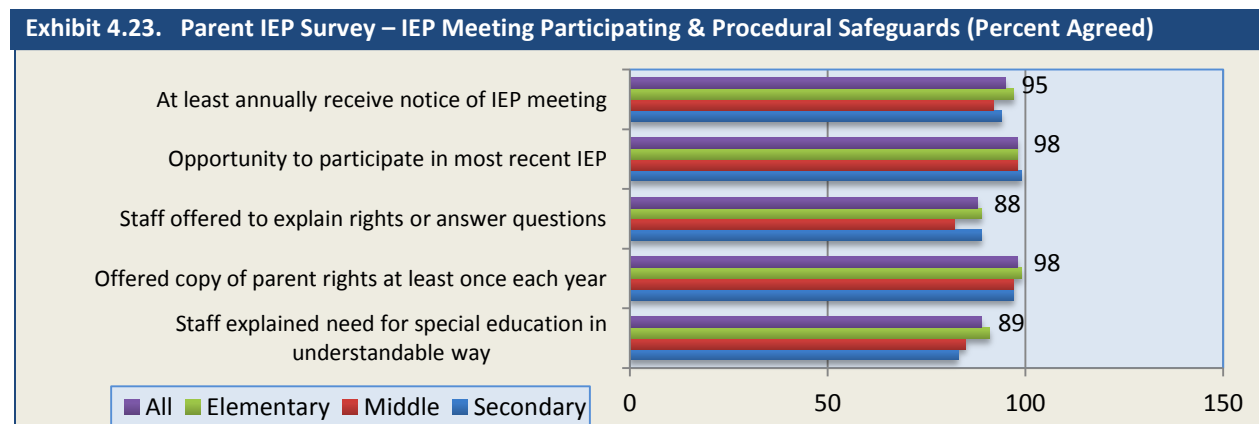
Most students responding to their survey reported having positive perceptions of their experiences, and they believe they are receiving the right level of support and know where to go for help. Also, students reported an overall positive experience with their receipt of special education services and their classes. Yet, only 58% agreed with the statement, “I like school.” Students with an IAT or 504 were more likely to agree with that statement. A high 80% of student respondents reported that they have participated in transition conversations.

As reflected in Exhibit 4.22, the most frequently listed additional areas of learning that students would like to have are: “Life After High School” (45%), followed by “Homework Strategies” (32%), “Other” (14%), and “Help with Positive Behavior” (9%).

Exhibit 4.22. Areas of Student Interest		
	# Responses	% of Total
Life After High School	171	45%
Homework Strategies	123	32%
Other	52	14%
Help with Positive Behavior	36	9%

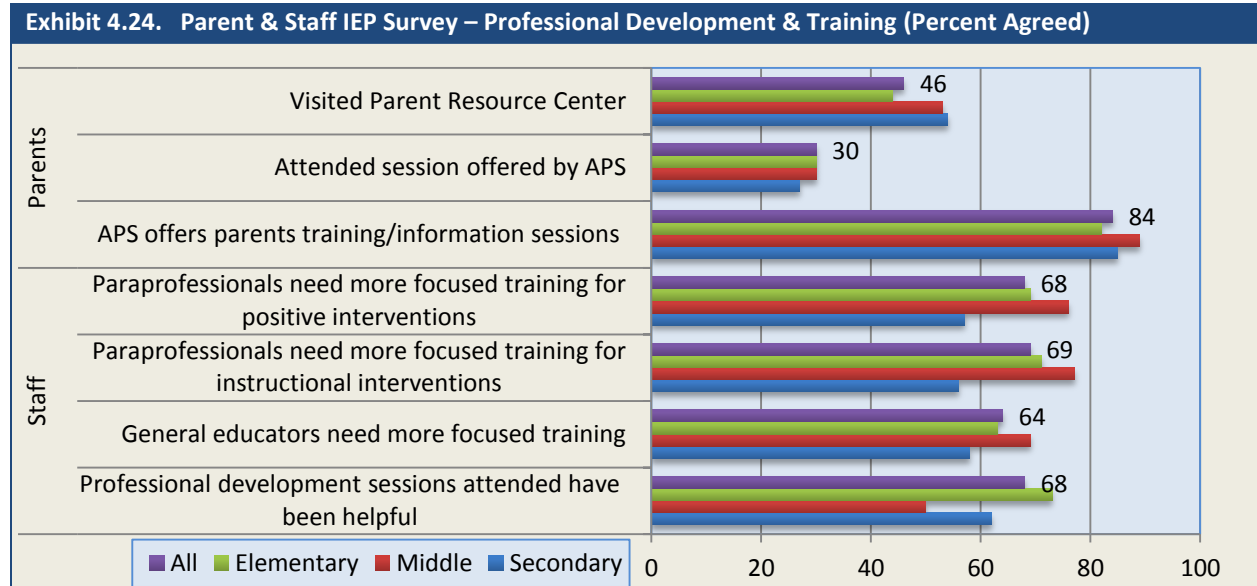
Procedural Safeguards

A very high percentage of parent respondents agreed that various procedural safeguards relevant to special education and IEPs were followed: at least annually they received notice of IEP meetings (95%); they had an opportunity to participate in their child’s most recent IEP meeting (98%); staff offered to explain parental rights or to answer questions (88%); they were offered notice of their parental rights at least annually (98%); and they received from staff information about their child’s special education need in an understandable way (89%). These rates were consistent across grade levels and represent a high rate of compliance.



Professional Development & Training

More than half of the staff respondents agreed that professional development (PD) sessions attended have been helpful (68%); that general educators need more focused PD (64%); and paraprofessionals need more focused PD for instructional interventions (69%) and positive interventions (68%). Parents responded that 30% of them had attended a training session offered by APS and that 46% had visited the Parent Resource Center, a higher percentage than the 31% of parents of students with Section 504 plans.



As part of the survey process, both staff and parents expressed an interest in receiving additional training. Areas of staff interest and the number of staff members expressing an interest in each area are provided below:

Exhibit 4.25. Staff Training Interests	# Responses	% of Total
Supporting Positive Behavior	438	20%
Co-Teaching and Inclusion	332	15%
Social Skills	328	15%
Differentiated instruction	326	15%
Progress Monitoring	310	14%
General Education Intervention	303	14%
Transition Planning	120	5%
Other	76	3%

Areas of staff interest and the number of staff members expressing an interest in each area are provided below:

Exhibit 4.26. Parent Training Interests	# Responses	% of Total
Transition Planning	32	28%
Learning Homework Strategies	28	25%
Other	18	16%
Supporting Positive Behavior	14	4%
Autism	5	4%
Complaint Resolution	5	4%
Special Education PTA	5	4%
Arlington Special Education Advisory Committee (ASEAC)	3	3%
APS Parent Resource Center	2	2%
Understanding the Special Education Process	1	1%

Opportunities for Improvement

The following describes areas for improvement related to: supporting instruction for students with an IEP in the general education setting and in special programs; and general practices that impact both groups of students.

Supporting Instruction for Students with an IEP in the General Education Setting

APS educates a smaller percentage (44%) of students with an IEP in general education at least 80% of the time, compared to 60% at the national level. The areas below impact APS's effective instruction and support of these students within the general education setting. They range from appropriate supplementary aids/services to maximizing access to all students with an IEP who would benefit from a more inclusive educational setting.

- **Co-Teaching.** The use of co-teaching does not have the support of a districtwide strategy with clear expectations or directives for co-teaching; its success is completely reliant on the willingness of school administrators to support its use. Each school tends to have its own model, even if the model relies less on support within general education classes and more heavily on the removal of students to special classes.
- **Differentiated Instruction.** When co-teaching is not in place, general educators' willingness to accommodate students and work with special educators varies greatly. In some instances, there is a view that some general education teachers still see students with disabilities as "somebody else's children."
- **Research-based Intensive Interventions for Reading & Math.** As was discussed in greater detail previously (Section 2. IATs: Administration & Implementation), APS personnel lack a consistent understanding of research-based interventions designed to significantly improve academic achievement and social/emotional learning for all students, including students with disabilities. Too often, learning accommodations/modifications and strategies were misunderstood to be research-based interventions for reading, in particular, and for math. Contributing to this circumstance is the absence of a comprehensive system of interventions based on student targeted needs to escalate performance and reduce achievement gaps with nondisabled peers.
- **Planning & Collaboration.** Collaborative planning between general/special educators and related service personnel occurs sporadically, without the benefit of established standards and supports, e.g., scheduled planning time. This issue was raised as a consistent barrier to developing true co-teaching partnerships and supporting effective inclusive instruction.
- **Professional Development.** Reportedly, APS has not institutionalized in its professional development an emphasis on strategies for educating students with an IEP in general education classes with the supplementary aids and services they require for support. In the absence of such training and written guidance, there is a lack of clarity around issues, including co-teaching roles.
- **Access to Rigorous Courses.** At the high school level, as the level of course difficulty increases the percentage of students with an IEP decreases. There was no evident strategy in place for encouraging students with an IEP to access the more advanced courses or the full range of business/technical courses that would give them training and preparation for future education or work. Such a strategy would include needed differentiated instruction, specialized instruction and supplementary aids/services.

Supporting Instruction in Special Programs

As with most school districts, APS has a service delivery system that is organized around specific programs, e.g., MIP-A, Functional Life Skills, Interlude, etc.⁹⁴ Typical of this configuration, programs are predesigned to meet a constellation of student characteristics and needs. Students who receive special education services more than 15 hours each week are placed in such a self-contained program. The areas below impact APS's effective instruction and support of these students within these special programs and the extent to which they access the general education setting with appropriate support.

- **Early Childhood.** APS's configuration of services for preschool children with an IEP is not based on a model of inclusive education with their nondisabled peers. This is a missed opportunity for modeling language and social skills by typically developing peers.
- **Access to Core Curriculum.** Especially but not only at the elementary level, students in a special class are in multiple grades, making it more difficult to provide access to each student's grade level core curriculum. Access to grade level curriculum for students in special classes most of the school day varies greatly across the district and impacts their performance on SOLs. Instruction in general education classes with appropriate supplementary aids/services provides the most effective access to the core curriculum. As appropriate, this instruction may be reinforced through interventions and support provided in separate classes for 80% or less of the time. While 69% of staff survey respondents agreed that students in separate classes taking SOL assessments received core curricular instruction, only 40% agreed that special educators receive the teacher versions of relevant grade level text books and that half receive SOL assessment test books at their students' relevant grade levels.
- **Reading Interventions.** Typically, students with an IEP are removed from general education classes because their reading levels are significantly below their peers. However, students in cross-categorical classes can be provided small group reading and/or math interventions targeted to improve performance as a supplement to general education differentiated instruction provided during the remainder of the day. This model depends on access to research-based interventions and an operational structure that supports their effective delivery.
- **Special Educator Content Knowledge.** As with other school districts across the country, all special educators who co-teach in core curricular areas need to have more knowledge of the content, especially in the areas of reading, math and science. Content area knowledge is especially daunting for special educators required to teach more than one subject area. Although this issue is raised in relationship to co-teaching within general education classrooms, its importance is also relevant to instruction in separate classes. This is a particular problem when special educators teach several content areas. In recognition of this issue, APS has taken steps to hire dually certified teachers at the secondary school level.
- **Other Issues.** Additional areas of practice that impact use of more inclusive and specialized instruction include: infrequent use of flexible grouping of students, provision of social skills instruction, and special class capacity.

⁹⁴ Multi-Intervention Program for Students with Autism Spectrum Disorder

General Practices

The following areas of practice impact all students with an IEP, regardless of whether they are educated in the general or special education environment.

- **Overall Satisfaction.** A high percentage of staff survey respondents believe there is a high level of communication and collaboration with parents in the evaluation and IEP planning process. Generally, 72% of parents agreed that they are satisfied with their child's special education services; 84% reported that their children's teachers and therapists are aware of their child's learning needs and 75% reported that they have sufficiently high expectations of their children. A higher percentage of staff (90%) agreed that schools deliver highly effective programs/services. Most student survey respondents reported positive perceptions of their experiences, and they believe they are receiving the right level of support and know where to go for help. Yet, only 58% agreed with the statement, "I like school." Students with an IAT or 504 were more likely to agree with that statement.
- **Eligibility, IEP & Placement Process.** Parent participation in IEP/placement decisions and the outcome of those experiences vary by school. There was a noted lack of consistency in how schools engage parents and how the eligibility process unfolds. Parents suggested that the lack of a clearly defined, centralized process allows for school leaders and teams to create site-based processes that lead to markedly different decisions about eligibility and services. In spite of the strong collaboration PCG witnessed between APS and parent representatives during the course of this review, there is mistrust and strong feelings that interfere with consistent school-based staff/parent collaboration.
- **Parent/School Communication.** Parents would like APS to have schools identify a communication tool, e.g., Blackboard, GroovyToo.com, and have teachers expected to use it consistently. This process would help parents to have reasonable expectations about this type of communication and facilitate the exchange of information with teachers.
- **Professional Development.** More than half (68%) of staff respondents agreed that professional development (PD) sessions attended have been helpful; and similar percentages believe that general educators and paraprofessionals need more focused PD. A smaller percentage (40%) of parent respondents reported that they had attended a training session offered by APS and that 46% visited the Parent Resource Center (a higher percentage than the 31% of parents of students with Section 504 plans.)
- **Progress Monitoring.** As discussed in Section 2 regarding IATs, the monitoring of student progress is not done consistently across schools. Although most survey staff respondents reported that APS has a consistent approach to progress monitoring, 52% agreed that general and special educators need a toolkit for progress monitoring and training for its usage.
- **CLASS.⁹⁵** Although CLASS data captures many important areas relevant to teaching and learning, there are several important components that are not included: access to core curriculum, differentiated instruction, accommodations and modifications, use of effective interventions for reading and math, use of data, and monitoring student progress. These components are relevant for all students, and especially for students with special needs. In addition, CLASS data does not address the area of co-teaching, which has important implications for students with an IEP and benefits all students. Finally, data does not include fields for disability or program type, which would facilitate further disaggregation of data.

⁹⁵ Classroom Assessment Scoring System

- **Post-secondary Transition.** Half of the parent survey respondents agreed that their child’s IEP team discussed transition to adulthood but 11% did not know; 36% reported their child’s IEP had transition goals; and 41% agreed that their child received an assessment to support transition planning. Overall, transition planning appears to be effective for students in traditional programs, e.g., EBCE and SWAT; and least effective for students with Asperger’s who require a different approach. Although plans are in place for students currently in middle/elementary schools, the needs of current high school students have not been addressed adequately. More attention is required for middle school transition activities to maximize forward planning. Although it could be improved, the automotive program models support for students by modifying competency assessments and grading criteria based on student IEPs, and sponsoring internships with community businesses.

RECOMMENDATIONS

5. **Actualize APS’s vision as a diverse and inclusive school community, committed to academic excellence and integrity, by maximizing inclusive and effective instruction, intervention and support for all students, including those with special and dual needs.** These students include those who are ELLs and/or receive support through MTSS, a Section 504 plan, and/or an IEP. Lay a foundation for this work by expanding the district’s courageous conversations involving race and ethnicity to include students with disabilities. With leadership of the Department of Instruction and the support of Student Services and stakeholders, establish a written vision and standards for practices that provide clear, non-negotiable expectations; and develop a comprehensive implementation plan that includes preschool through secondary grade levels. Ensure that in the delivery of professional development all staff members who need training receive it and are able to demonstrate its use.
 - a. **Courageous Conversations.** Engage in courageous conversations with stakeholders and school board members about the district’s current configuration of services for students with disabilities, their performance over time, and the district’s fortitude to embark on a journey to provide services in a more inclusive manner and become known as a leader in the state and nation for improved outcomes for students with special needs.
 - b. **Leadership & Stakeholders.** Because of the nature of the paradigm shift necessary to achieve success, which includes the active involvement of general education, it is important that the initiative be viewed as an “educational” initiative rather than a “special education” initiative. Have a senior staff member in the Department of Instruction lead an implementation team, including representation from Student Services, ESOL/HILT, and principals to guide the implementation process. Engage the support of ASEAC, SEPTA and university partners, and their resources. Establish specific stakeholder groups as needed to consider such areas as preschool and other grade level inclusive practices, high school course offerings, etc.
 - c. **Standards.**⁹⁶ Establish a written vision and standards for practices that provide clear, non-negotiable direction in areas that include:
 - 1) **Responsibility of school principal and personnel for all students** in the school, including students in countywide programs. (Change the name of “countywide programs” to

⁹⁶ The use of the term “standards” is not intended to refer to a “cookie-cutter” practice approach. Rather, it refers to core elements that research has shown are more likely than not to lead to success if implemented with fidelity. It is expected that these practices would be implemented in a manner that takes into account local school factors and uniqueness.

- maximize the effective inclusion of students with disabilities in all aspects of the school's academic and nonacademic programs and extracurricular activities to one that would not imply that the programs are not an integral part of each school in which they are located, e.g., specialized or clustered programs.)
- 2) **Support for the most integrated, cohesive, and comprehensive services** for students with disabilities in the schools and classrooms they would attend if they did not have a disability and the use of a **universal design for learning** to maximize access to core instruction in the classroom level, including the use of **assistive technology** and **differentiated instruction** at all grade levels. Establish an expectation that textbooks for general education classes/teachers will be ordered and provided for any special program classes/teachers as well.
 - 3) **Use of MTSS** (as it is developed with effective academic and social/emotional interventions, progress monitoring, problem-solving, goals intended to close achievement gaps, etc.) for students with an IEP. Ensure standards include use of **reading and other interventions** effective for the use of students with an IEP and dually identified students.
 - 4) **Culturally responsive and linguistically appropriate** instruction, including a revised ESOL/HILT checklist that is user-friendly, research-based and field-tested with school-based personnel.
 - 5) **Progress Monitoring**. Establish standards for monitoring student performance, including the frequency of monitoring and its documentation to reflect teaching effectiveness and learning growth. Establish standards developed for the MTSS process so that these standards provide for at least if not more frequent monitoring and comprehensive documentation for students with an IEP.
 - 6) Research-based **co-teaching** methodology for all grade levels, including early childhood.⁹⁷
 - 7) Research-based practices for including **students with severe disabilities**. See *Students with Severe Disabilities and Best Practice*.⁹⁸
 - 8) Research-based standards for the functional life skills and other **special programs**, including students' access to the core curriculum.
 - 9) **Flexible grouping** for instruction/services that are not dependent on a student's "program" or disability area, e.g., access to social skills instruction.
 - 10) **Scheduled common planning time** for general/special educators and professionals to have structured opportunities to share information about students. Have special educators assist general educators to understand how to best provide targeted and appropriate supports based on student needs.
 - 11) **Creative use of scheduling** to ensure needed flexibility for true co-teaching to occur.
 - 12) **Master schedule** by which students with special needs and those receiving

⁹⁷ For co-teaching resources, see Dr. Marilyn Friend's *Co-Teaching Connection* website at <http://www.marilynfriend.com/index.htm>, and the National Dissemination Center for Children with Disabilities' website, *Co-Teaching: General and Special Educators Working Together* at <http://nichcy.org/schoolage/effective-practices/coteaching>.

⁹⁸ <https://www.dropbox.com/s/5aee10stykr8o4b/Students%20with%20Severe%20Disabilities%20%26%20Best%20Practice.pdf>

ESOL/HILT services are to be scheduled first to ensure individual needs are better met.

- 13) **Access to rigorous secondary school required & elective courses**, including the use of co-teaching and supplementary aids/services. Communicate with parents/students the availability of such supports for students. Expect staff to encourage students to enroll in these courses.
 - 14) **Active student involvement** in the IEP process, including student-led IEP meetings, progress monitoring and planning (Transition planning for students with an IEP begins in grade 8 or at age 14, whichever comes first.)
 - 15) **Parent/School Communication System** to enable parents and teachers to share information easily.
- d. **Districtwide Implementation Plan.** Develop an implementation plan, building on components for MTSS. Address needs for ELLs, students with disabilities, and students who are twice exceptional (gifted students with an IEP); identify staff accountable; establish roles and responsibilities; provide for differentiated professional development and parent training; establish demonstrable outcomes; and include the following components:
- 1) **Research-based Interventions.** Based on a menu of research-based multi-tiered interventions for reading, math and social/emotional learning (including those for preschoolers, and ELLs), establish a two to three year timeline for each school to have access to sufficient resources and training for their students.
 - 2) **Effective Models.** Establish various effective scheduling models for co-teaching and planned collaboration.
 - 3) **Tie the planning process to MTSS** (academic and social/emotional) to minimize fragmentation, enhance cohesiveness and reinforce the framework as applying to improved outcomes for all students.
 - 4) **Districtwide & School-based Teams.** Have districtwide and school-based teams facilitate implementation based on parameters set by the Leadership Team and standards described in *New Teacher Teams Support Integrated Comprehensive Services*.⁹⁹
 - 5) **Time Frame.** Establish an aggressive but reasonable overall time frame, e.g., five years, for implementation and individualize transition of students back to their home schools, ensuring that appropriate supports and services are in place.
- e. **Professional Development.** As part of the professional development program referenced in the Districtwide Implementation Plan, incorporate the following:
- 1) **Professional Learning Standards.** Professional development based on national professional learning standards, such as Learning Forward's Standards for Professional Learning.¹⁰⁰
 - 2) **Core Content & Reading Instruction.** Plan for how special educators will become more knowledgeable about core curricular content and reading instruction to become both highly qualified and effective teachers. Include ESOL/HILT teachers, and general educators as needed.

⁹⁹<https://www.dropbox.com/s/7hpo5vlxpnviqt/%20New%20Teacher%20Teams%20to%20Support%20Integrated%20Comprehensive%20Services.pdf>

¹⁰⁰<http://www.learningforward.org/standards#.UMvVD7Yt0kU>

- 3) Knowledge Required for Inclusive Instruction.** With knowledgeable representatives of general/special educators identify knowledge, skills, and expertise necessary to teach effectively in inclusive settings. Also, ensure training is aligned with core curricular standards for all students and that instruction is not based on a “special education curriculum with its own scope and sequence.” Through a survey or other method, identify gaps in content core curricular knowledge of special educators, especially at the secondary school level, and aggressively develop courses and/or other methods for personnel to obtain this information.
- 4) Dual Identified Students.** Information relevant to ELLs, including Sheltered English Instruction Protocol (SIOP) training and reinforcement. For ELLs, reinforce use of the Sheltered English Instruction Protocol (SIOP).
- 5) Engage Stakeholders.** Inclusion of the following/other relevant groups when planning learning opportunities: principals; general, special and gifted educators; special education assistants; ESOL/HILT teachers; clinicians; administrators; and parents. Differentiate instruction for varying knowledge/skills and ensure that sessions clearly identify and address the knowledge/needs of the intended audience.
- 6) Access to Training.** Utilize a broad range of training/technical assistance models, such as the following:
 - a) Multiple formats** (e.g., videos, webinars, narrative text, distance learning) and presentation models (e.g., school-based, small groups, etc.) that are differentiated, based on current levels of staff knowledge and skills.
 - b) APS’s website** to present access to training materials for various stakeholders.
 - c) Cross-functional teams** with individuals who directly support schools in order to provide primary training to the broadest spectrum of administrative and instructional staff, so they can help provide direct support, mentoring, coaching, and technical assistance to principals and teachers.
 - d) Cross-school opportunities** for discussion to identify exemplary inclusive education practices and personnel to be able to become professional developers, and arrange visits to observe model inclusive education practices.
 - e) Trainers** who are staff members and others having the experience and knowledge to be part of a professional development faculty.
 - f) Modified walk-through protocols** to include the standards, monitor the extent to which school practices conform to the guidance, and initiate technical assistance, professional development, coaching, and mentoring as necessary to improve practices.
- f. Assistive Technology.** Track assistive technology referrals to ensure there are timely assessments and follow-up. Conduct an assistive technology survey to determine the extent to which students who need services have them and are using them as intended. Collaborate with Instructional Technology to determine whether it is economically feasible to provide schools with a set of the most frequent assistive technology devices, including those relevant for students with Section 504 and involved with the MTSS process. This approach was used by the Scottsdale Public Schools (AZ) and received positive feedback for its effectiveness and positive outcomes.
- g. CLASS Protocol & Data.** Review the CLASS observation protocol and revise it to ensure that it includes sufficient indicators relevant to differentiated instruction, MTSS implementation and

inclusive education standards, and that observers have the knowledge and training necessary to assess these areas. Add to the CLASS protocol areas to address: access to the core curriculum; differentiated instruction; accommodations and modifications; use of effective interventions for reading and math; use of data; monitoring student progress; and co-teaching. Also, add to the observational data collection fields for student disability and program type to support more detailed analysis. Ensure that all observers have expertise in the area of special education, MTSS and 504 and have reviewed student IEPs, IATs and 504s.

h. Post-secondary Transition. Bring together representatives from ASEAC, SEPTA, representatives (including ESOL/HILT) from each middle and high school who are knowledgeable about transition services, and central office representatives from the Student Services and the Career, Technical and Adult Education departments to discuss challenges and barriers to meaningful and effective postsecondary transition activities and support, including those for students with Asperger's and students with Section 504-only disabilities. Provide research for the group to review, such as information available from the National Center for Secondary Transition and the National Alliance for Secondary Education and Transition, as well as information about the automotive program and how the needs of students with an IEP are addressed.^{101,102} Based on this discussion, identify immediate and long-range steps, including protocol for guiding research-based practices. Also, determine whether access to transition coordinators at the middle school level is financially feasible. In addition:

- 1) Professional Development.** Identify professional development needed for general and special educators to meet the post-secondary transition needs of students with an IEP and dually identified students; and
- 2) MAPS.** Review and determine the efficacy of using Making Action Plans (MAPS) for student centered transitional planning.¹⁰³
- 3) Student-led Meetings.** Review literature related to student-led meetings (MTSS, 504, IEP) to support self-advocacy skills and increased student involvement in their educational planning.¹⁰⁴

i. Communication

- 1) Internal.** Establish a timely communication and feedback process to share solutions to inclusive education implementation barriers. Several problem areas are likely to require a targeted group of knowledgeable people to resolve implementation issues as they arise.
- 2) Parents/Families.** With input from the Arlington Special Education Advisory Committee (ASEAC), the Parent Resource Center (PRC) and other relevant parent groups, develop electronic and written materials and other modes of communication to explain inclusive education to families, its progress, and how parents can have input in and be involved with the process. Ensure that this information is accessible to parents who have limited English proficiency or have difficulty reading.

¹⁰¹ <http://www.ncset.org/>

¹⁰² <http://www.nasetalliance.org/>

¹⁰³ MAPS, or Making Action Plans, is a planning process used by teams to help students plan for their futures. It is directed and guided by the student and family and is facilitated by the team members.

<http://www.wiu.k12.pa.us/cms/lib6/PA14000132/Centricity/Domain/12/MAPS.pdf>

¹⁰⁴ See Student-led Individual Education Plans at <http://www.pacer.org/tatra/resources/POD/studentlediep.asp>.

Section 5. ELLs: IAT, Section 504 & Special Education Administration & Implementation

This section includes information pertaining to the process APS uses to identify English Language Learners (ELLs) as having special needs and the services they receive.

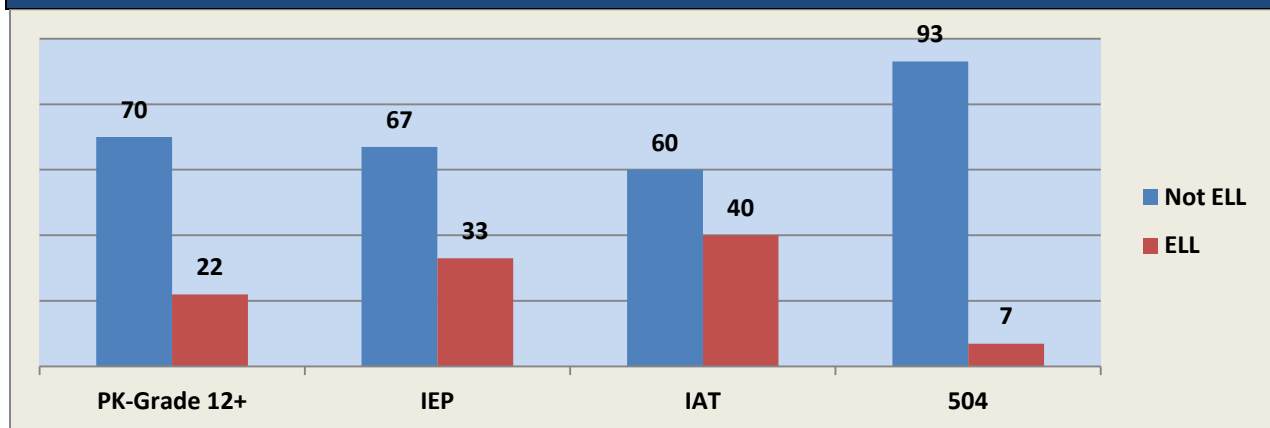
Background

Compared to their enrollment in APS (22%), almost twice as many ELL students have IAT plans (40%).¹⁰⁵ The composition of ELLs with an IEP (33%) is also higher compared to their APS enrollment, but to a lesser extent than for the area of IAT. ELLs are significantly underrepresented (7%) in the area of Section 504.¹⁰⁶

APS's English for Speakers of Other Languages/High Intensity Language Training (ESOL/HILT) program serves students from diverse linguistic and cultural backgrounds. The district has a large number of ELLs compared to both national and state averages.

- 18% of APS students receive ESOL/HILT services.
- 25% of elementary students and 10% of secondary students are ELLs.
- ELLs represent 97 different home languages.
- 64% speak Spanish, 6% Amharic, 4% speak Arabic, 4% Mongolian, 3% Bengali.
- Of APS's ELL enrollment, 15% have IEPs, 4% have IATs, and less than 1% have 504 plans. See Appendix L for detailed information provided initially in Interim Report #1.

Exhibit 5.1. Percent of APS Enrollment, IEP, IAT & 504 by Students who are ELLs (2010-11)



¹⁰⁵ English for Speakers of Other Languages/High Intensity Language Training (ESOL/HILT), English Language Learner (ELL) and Limited English Proficient (LEP) students all refer to a student whose native language is not English and is receiving special services to improve English language proficiency.

¹⁰⁶ Of the 720 LEP students with IEPs: 64% of them receive LEP services; 24% of them had services declined; and 12% are former LEP students. Of the 79 LEP students with 504 plans: 79% of them receive LEP services; and 11% had services declined and 10% are former LEP students.

Identification & Eligibility for Services

The information below describes APS's process for considering the language acquisition of ELLs in the IAT and special education eligibility processes. Relevant information is not included in the district's procedures for Section 504.

IAT Process

APS has a variety of information that is "required" for IAT participants to consider regarding language acquisition for non-native English speakers or second language learners, including: Educational Checklists and Suggested Adaptations; information about the student's language use-pattern, cultural background and mode of communication; and levels of language proficiency.

A January 2, 2008 memorandum from the Department of Student Services' Assistant Superintendent reminded principals about the importance of including ESOL/HILT teaching staff in IAT meetings. The memorandum did not cross reference the district's Bridge Manual, which includes a section focused on the IAT process. Also, it did not specify the extent to which schools are expected to following the substantial information in the Bridge Manual, including checklists.

Special Education Process

The identification of students who are ELL and receive special education instruction was raised as a consistent concern, both among special education and ESOL/HILT staff.

Case study review participants noted the challenge of discerning language and cultural barriers versus the cognitive needs of the student. Some concerns were raised that the IAT process presented unnecessary barriers to a special education referral for second language learners who may really need it. Teachers expressed the strong desire to provide the most appropriate services to their students, but expressed trepidation about their ability to differentiate language acquisition related issues from a disability. Both focus group and the case study review participants reiterated the need to first rule out language acquisition as a factor prior to referral but were not confident this is being done accurately and consistently.

Some staff noted that they believe this hesitation might not be in the best interest of the student. As one focus group member expressed, the district seems to have "an inappropriate reluctance" in referring ELLs for a special education evaluation. There was a concern that sometimes the focus is too much on the procedural issues instead of what is best for the student. An ESOL/HILT teacher in the file reviews, for example, referenced multiple examples of students she believed did not receive access to timely and much needed special education services—a timeline that was only extended by the IAT process. Given the higher percentage of ELLs with an IEP, however, this concern may reflect the fidelity of the IAT process rather than a higher need for special education services. As expressed by other participants, with universal training on research-based instruction and intervention for this population and resources available to do so, these students would have better achievement outcomes and reduce the perception that only special education services will have a positive impact.

The Special Education and the ESOL/HILT office, recognizing the unique learning needs of this population, developed in 2008 a detailed Bridge Manual to provide information and resources to teachers for IAT, Student Study, eligibility determinations and the development of IEPs. This manual is filled with excellent material and should be a resource for all teachers. However, it is dense and should

not be treated as a standalone document. Also, the Bridge Manual is not on the APS website, which limits its accessibility.

ESOL/HILT Checklist

The ESOL/HILT checklist is a comprehensive tool that was created by the district to help with the special education identification process. It is included as an Appendix to the Bridge Manual. There are two checklists: one for elementary school and one for the secondary grades. The checklist is a strong tool that should be considered equally as a professional development tool and a resource for teachers. It includes a number of excellent accommodations and adaptations that teachers could use as interventions for students. However, it is quite long. At 29 pages, its length seems to overwhelm some staff and may distract from its utility. While it is mandatory, focus group participants were uncertain if it is always used. It was not consistently found or referenced in student's files during the records review, but there may have been some instances where it was simply not pulled for this process. Based on survey responses, 47% of all staff respondents agreed that the checklist is used; the percentage of agreement was higher at the elementary school level (60%) than at the middle (25%) or high school (30%) levels. Further, an overall 61% of staff respondents indicated that an ESOL/HILT teacher consulted or participated in meetings to determine an ELL's eligibility for special education services.

Collaboration between Departments

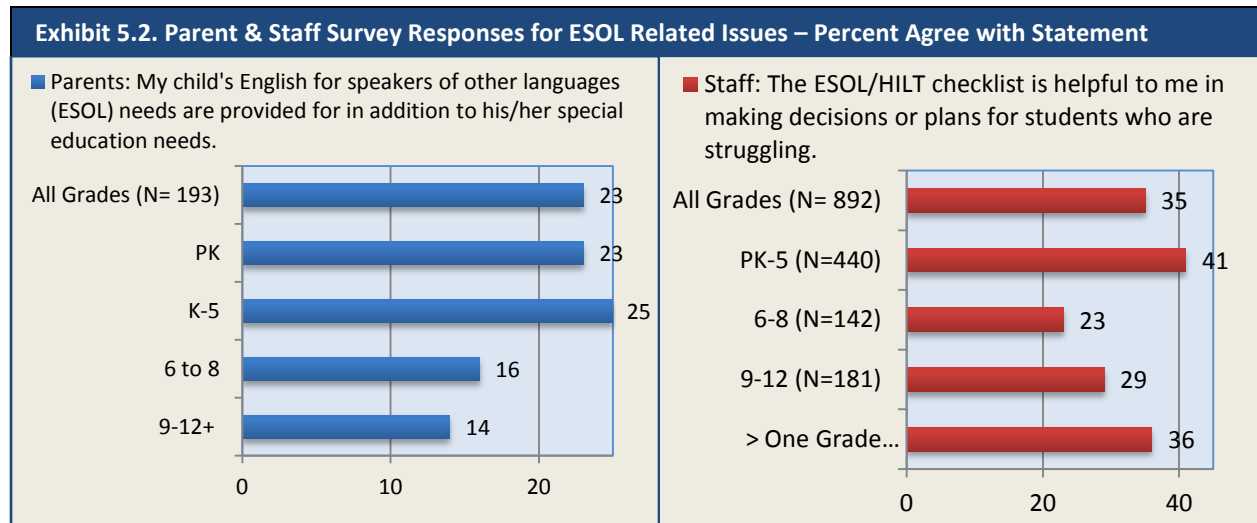
The Special Education and ESOL/HILT Departments have shared funding and resources to provide a number of professional development opportunities, which are described on the following page. While the Special Education and ESOL/HILT Departments have made deliberate efforts to collaborate and communicate more effectively, it was noted that there is still substantial work to be done. Focus group participants made comments such as the "two departments are so separate," "don't seem to work together," "exist as separate entities," and are "siloeed." One example reflects different perspectives from the ESOL/HILT office and special education departments about the referral process for ELL students. Those from ESOL/HILT tended to believe that the special education department slowed down the referral process, while special educators perceived ESOL/HILT staff as delaying student access to special education. Such different perspectives are often fueled by insufficient communication and on-going collective work where each office understands each other's processes and practices well and identify/follow-up on any problematic areas.

The Bridge Manual and checklist are prime examples of collaborative efforts between the two departments. The Bridge Manual extends this collaboration to schools by establishing that all schools have a Bridge Team. These Teams are comprised of at least one special educator and one ESOL/HILT specialist. The function of these Teams is to ensure that all students who need dual services are properly identified and are receiving the required services. They are also charged with providing professional development and instructional guidance to the colleagues about how to best address the learning needs of this population. Although all schools have a Bridge Team on paper, the Teams vary by school in strength and effectiveness.

Provision of Services

Parents and staff survey responses reflected a variety of concerns about the consideration of ELLs' language needs when providing or planning services for their special need services. The responses are summarized on the following page and illustrated in Exhibit 5.2.

- **Parents.** Only 23% of 193 parents agreed that their child’s ESOL needs are being provided for in addition to his/her special education needs. This rate dropped to 16% for parents of middle school students and it was 14% for parents of high school students.
- **Staff.** Only 35% of 892 staff persons agreed that the ESOL/HILT checklist is helpful in making decisions or plans for students who are struggling; only 23% of middle school staff agreed.



A theme that emerged in multiple file review sessions was the misconception that “Special Education trumps HILT.” In many instances, well-meaning teachers articulated this belief to describe the services received by a particular student. Others seemed to understand students should be receiving both sets of services, but noted the logistical challenges to do so. Focus group participants echoed this challenge. It was noted that students who receive special education services in a self-contained setting are the least likely to also receive ELL services. PCG did not review student schedules or teacher service documentation, so is only able to report on staff perception.

School Based Expertise

The district has identified the need to have more dually certified teachers to help with the specific challenges that arise in serving ELL students receiving special education instruction. At the secondary level, a school position was created for this particular purpose. Reportedly, it has been challenging finding qualified individuals with both certifications and the positions have not all been filled.

The strength of this approach was observed during the records review. Participants from a high school that had this position spoke of the strong collaborative relationship they had with the dually certified teacher. This person attended IEP meetings, helped teachers with designing IEPs, and served as an advocate for dually identified students in their school. The language used by records review participants highlighted the impact this individual had on their practice. Services provided to the students in this school were perceived to be relevant, appropriate and well thought out.

Professional Development

Special education staff expressed a universal desire for professional learning to better address the needs of their dually identified students. There was a consistent theme among staff around the need for more targeted professional development. The district has recognized the need for additional professional

learning and has enlisted several well-respected resources to engage in a systemic professional development approach. The district has also provided professional development through the University of Virginia leadership program, which helped staff better recognize dually identified students. Last spring, Dr. John Hoover, from the University of Colorado, worked with staff to help them better distinguish reading acquisition from learning disabilities for ELLs and to provide appropriate supports in both cases.

APS is now working to incorporate the principles of the Sheltered English Instruction Protocol (SIOP) countywide, which will benefit students with special needs. In the 2011-2012 school year, special education, HILT/ESOL, Title I and ELA all combined funds to pay for Center for Applied Linguistics (CAL) to provide SIOP training. There were four full days of training for representatives from the eleven schools with the largest numbers of ELLs. There has also been site-based training at nine schools for SIOP training. Elementary and ESOL/HILT specialists are doing walkthroughs at these schools to consider the extent to which the teachers are using what they have learned. Although principals are attending the trainings, they also need targeted training on how to be sure the information is being implemented properly and to be expected to join the walkthroughs for this purpose.

Opportunities for Improvement

Compared to their enrollment in APS (22%), almost twice as many (40%) ELLs have IAT plans (40%). The composition of ELLs with an IEP (33%) is also higher compared to their APS enrollment. ELLs are significantly underrepresented (7%) in the area of Section 504. The following are areas for improvement in the identification and provision of services for ELLs with special needs.

- **Consideration of Language & Special Education Child Find.** APS personnel have difficulty discerning language and cultural barriers from the cognitive needs of ELLs. This difficulty impacts the special education child find process in two diametrically opposed ways: that students are found eligible without sufficient consideration to language acquisition and its impact on teaching and learning; and that the IAT process unnecessarily delays special education referrals. As expressed by some APS staff, with access to universal training on research-based instruction and intervention for this population, these students would have better achievement outcomes and reduce the perception that only special education services will have a positive impact.
- **Standards.** A detailed Bridge Manual provides information and resources to teachers for IAT, Student Study, eligibility determinations and the development of IEPs. Although it contains excellent material, the Bridge Manual is not on the APS website, which limits its accessibility. Each school is to have a Bridge Team with at least one special educator and one ESOL/HILT specialist to: ensure all students needing dual services are properly identified and receiving required services; and to provide support to colleagues in this area. Although all schools have a Bridge Team on paper, the teams vary by school in strength and effectiveness. An ESOL/HILT checklist to support the special education identification process is long (29 pages) and distracts from its utility; of all staff survey respondents, only 47% agreed that the checklist is used and 35% agreed it is helpful. Neither the Bridge Manual nor the Section 504 Policies and Procedures Implementation Manual address the issue of ELLs and language consideration in the special education eligibility process.
- **Collaboration.** While the Special Education and ESOL/HILT Departments have made deliberate efforts to collaborate more effectively, there continues to be insufficient communication and on-going collective work where each office understands each other's processes/practices well and identify/follow-up on any problematic areas.

- **Dual Services.** Both parents and staff survey responses reflect concerns regarding the consideration of ELLs' language needs when providing and planning services for their special need services. Only 23% of 193 parents agreed that their child's ESOL needs are being provided for in addition to his/her special education needs. There is a misconception that "Special Education trumps HILT" in the logistical challenges to addressing the dual needs. There is also a perception that students with an IEP educated in self-contained settings are the least likely to also receive ELL services. Only 61% of staff respondents reported that ESOL/HILT teachers participate/consult in special education eligibility meetings.
- **Dually Certified Teacher Support.** The secondary level dually certified teacher position was created to address the identification and service challenges to dual service special need students. Although it has been challenging finding qualified individuals to fill these positions, one school's staff reported the strong collaborative relationship that has developed with their dually certified teacher and that dual services were relevant, appropriate and well thought out.
- **Professional Development.** There was a consistent theme among staff around the need for more targeted professional development. APS is now working to incorporate the principles of the Sheltered English Instruction Protocol (SIOP) countywide and site-based training at nine schools. Although principals are attending the trainings, they also need targeted training on how to be sure the information is being implemented properly and to be expected to join the walkthroughs for this purpose.

RECOMMENDATIONS

Many of PCG's recommendations provided above and in subsequent sections include information related to ELLs with special needs; the recommendations below supplement the other recommendations.

6. **Expect consistent and collaborative systemic planning between the Special Education and ESOL/HILT offices to develop/monitor the implementation of standards for ELL/special needs identification, service delivery and related professional learning development activities. Cross-train personnel to foster a better understanding of each other's policies, procedures, and practices, and use of any allowable funding sources. In addition, incorporate the following:**
 - a. **Standards.** Develop standards in the areas described below, provide differentiated professional development and training for staff/parents, and monitor implementation of the standards.
 - 1) **Written Manuals.** Ensure that IAT procedures, the Bridge Manual, special education procedures, and the Section 504 Manual specify that special services do not "trump" ESOL/HILT services and that both student needs (language and special) must be addressed appropriately. Put the Bridge Manual on APS's website and link it to all relevant departmental webpages. In APS's Section 504 Manual address language considerations for ELLs and reference the Bridge Manual; and in the Bridge Manual reference APS's Section 504 Procedural Manual.
 - 2) **ESOL/HILT Checklist.** With knowledgeable stakeholders, revise the ESOL/HILT checklist so it is user-friendly, research-based and field-tested with school-based personnel and ESL/special education services to dual-identified students. Communicate the changes using influential school-based personnel who can explain how the new process will improve outcomes for ELLs.

- 3) Bridge Team.** Establish an expectation that each school is to have a Bridge Team that functions as described in the Bridge Manual and that principals provide the support needed.
- 4) Consultation.** Specify that ESOL/HILT personnel or others with expertise will collaborate and provide consultation for ELLs in the IAT, Section 504 and special education process.
- b. Access to Services.** Confirm that all students who qualify for IAT, Section 504, IEP and ESOL/HILT services receive them. Work with schools to determine creative and research-based service delivery options, if needed.
- c. Professional Learning.** Expand and deepen SIOP and other professional development opportunities across the district to ensure all teachers understand how to teach ELLs, and reinforce the training that has been and will be provided with ESOL/HILT and Student Services support personnel.
- d. Dually Certified Staff.** Prioritize the hiring of dually certified staff.

Section 6. Support for Teaching & Learning for Students with Special Needs

This section includes information and an assessment of APS's activities to support teaching and learning for students with special needs in the following areas:

- Central office communication and collaboration;
- Student Services organization and staffing patterns/usage;
- General issues relating to support for appropriate application of state test accommodations, support for the student transition between grade level schools and special transportation, the use of task forces/committees, and support for parent/family and school partnerships; and
- APS's Special Education Policy and Procedures Implementation Manual (PPIM), documenting and determining educational setting, APS's electronic IEP system, and Student Services websites.

Central Office Communication & Collaboration

To provide maximum support for teaching and learning, central office activities and organizations need to be aligned, coordinated and focused. These aspects are especially important to support students with special needs given the many people involved at the different levels of the APS organization and the complexity of their needs.

Two of the eight departments that report to the Superintendent support schools and instruction: the Department of Instruction and the Department of Student Services. The Department of Instruction includes support for gifted services and ESOL/HILT. The separateness of the Student Services administration occasionally results in an inadvertent absence of information relevant to special education in the broader discussion of strategic activities involving instruction.

One example appears on APS's website pertaining to the Advisory Council on Instruction, which includes a section on "Information about Arlington Public Schools (APS)." This section includes a link to the organizational chart of the Department of Instruction but there is neither a reference nor link to the Student Services' organization and its important instructional components. On a more substantive note, although there were positive statements about the inclusion of Student Services representatives in discussions about instruction and a Special Education liaison participates in the ELA connection team, concern was expressed that this communication and collaboration does not occur on a sufficiently consistent basis to maximize its effectiveness and too often Special Education personnel work in isolation from their Instruction peers.

Student Services Department & Staffing Patterns/Usage

Student Services has an impressive system in place to support students and their families, including staff who support students with substance abuse, students and their families who are homeless, etc. The Department has two major units (Pupil Services and Special Education), each headed by a director who reports directly to the Department's Assistant Superintendent. In addition, the Principal of Stratford School reports directly to the Assistant Superintendent.

Overall Special Education & Pupil Services Reporting Structure

Based on the Student Services Department organization chart provided to PCG in April 2012, a large number of individuals supporting students with special needs directly report to the Director of Pupil

Services or the Director of Special Education. The former supervises almost 50 individuals and the latter almost 100. The various clinical services groups, e.g., psychologists, speech/language pathologists, etc., have lead specialists who support professional development, clinical case discussions, and chair group meetings. They do not have any supervisory authority over personnel and maintain a reduced caseload. This organizational structure makes it very difficult to produce effective staff evaluations.

Exhibits 6.1 and 6.2 below provide an outline of the Student Services organization chart, which provides a title for a few positions only, i.e., two directors (Pupil Services and Special Education), two supervisors (Counseling and Special Programs), 15 special education coordinators, 1 compliance coordinator and 3 attendance specialists. Where names of personnel were listed, the exhibits include in parenthesis the number associated with each personnel group. The chart does not include administrative assistants and may not include all personnel reporting to the organization.

Special Education Organization

In addition to the Special Programs supervisor and 15 special education coordinators, the Special Education Director directly supervises 76 individuals: 38 speech/language pathologists, 20 occupational therapists, 6 physical therapists, 4 transition resource assistants, 2 hearing services, 4 vision services, and 2 Parent Resource Center. The director is also responsible for assistive technology and due process related activities; the organization chart does not reference specific individuals for these activities.

The Special Program supervisor directly supervises 16 staff persons, including 10 for the Interlude program, 2 for contract services, 3 for countywide autism, and 1 for interim alternative programs. In addition, the supervisor is responsible for administering Comprehensive Service Act (CSA) activities, homebound services, and the Special Education Review Committee.

Exhibit 6.1. Special Education Organization
Special Program Supervisor
Interlude (10)
Contract Services (2)
Countywide Autism (3)
Interim Alternative Programs (1)
Comprehensive Service Act (CSA), Homebound Services, Special Education Review Committee
Special Education Coordinators (15)
1 Compliance Coordinator
Speech/Language Pathologists (36)
Occupational Therapists (21)
Physical Therapists (3)
Transition Resource Assistants (4)
Hearing Services (2) & Vision Services (4)
Parent Resource Center (2)
Assistive Technology, Dispute Resolution, Due Process, Medication & Appeals

Special Education Coordinators

The Special Education unit assigns a special education coordinator to each APS school; the coordinator visits each school between 1 to 1.5 days per week. Although various school personnel, including assistant principals may serve as the required local educational agency (LEA) representative at special education meetings, the coordinators often serve in this capacity. Special education coordinators serve as LEAs for eligibility, reevaluations and child find meetings but not for IEPs. Coordinators also take an active role in addressing school-based compliance issues, such as resolving parent complaints, etc.

As discussed above, the principal's leadership and vision are vital to bring about improved performance and positive behavior for all students, especially those receiving special education services. The special education coordinators can play a critical supporting role to the principal for this purpose. With the limited amount of time available for each school visit, a disproportionate share is devoted to facilitating meetings and addressing compliance issues. These activities leave little time to provide active and meaningful support to teachers through professional development and coaching, and to collaborate with school administrators around service delivery and instruction for students with disabilities.

While about half of the coordinators who participated in a focus group reported they are able to find some time to access classrooms, some coordinators believe it is not possible to support both instruction and compliance effectively with existing duties. It is highly unlikely that APS's financial circumstances would support an increase in the number of special education coordinators that would enable them to continue their current level of compliance support and become more involved in instruction.

Other school districts have addressed this issue by increasing the accountability of principals for the administration and operation of special education services in their schools. Such accountability has included responsibility for ensuring that special education meetings are facilitated effectively, and that decisions are made and documents are produced in a compliant manner. These expectations have been accompanied by sufficient professional development and support during the transition period. When such a system is in place, coordinators have more time to support each school's instructional activities and are available to help focus on more complicated compliance issues. Many of those interviewed expressed strong support for the current structure.

- Some administrators stated that they would be very uncomfortable leaving the process to school staff and that the coordinators are necessary to "push back" eligibility.
- Others believe that school-based personnel would never have the necessary level of expertise to carry out required activities.
- Some principals expressed a desire for more instructional support from the coordinators but the principals wanted the coordinators to continue to attend meetings.
- Some parents expressed concern that such a model was used by another school district and meetings were not held in a timely manner during the first year of implementation. Coordinators are viewed as individuals who have been able to bridge differences with school-based personnel and that they are more objective.

A smaller number of those interviewed indicated that they would welcome a change to the current model and that they have organized their service delivery in this manner and provided relevant training to support it. They perceive that they are helping to address the achievement gap by supporting instruction in a more direct manner. They indicated that there are circumstances in which the coordinator is unable to attend a meeting and that the school carries on using the assistant principal as the LEA representative and perhaps the counselor or social worker as an objective voice.

Pupil Services Organization

In addition to the counseling supervisor, the Pupil Services director directly oversees 47 individuals: 23 psychologists, 16 social workers, 3 full-time substance abuse counselors, 1 part-time substance abuse counselor, 3 attendance specialists, 2 half-time staff for Section 504, and 1 part-time employee for the Homeless Program. Also, the unit coordinates home instruction, medical and psychological transfers, and student records.

Exhibit 6.2. Pupil Services Organization¹⁰⁷
Counseling Supervisor
Psychologists (23)
Social Workers (16)
Substance Abuse (3 full-time, 1 half-time)
Attendance Specialists (3)
Section 504 (2 each half-time)
Homeless Program (1 part-time)
Home Instruction, Medical & Psychological Transfers, Student Records

Section 504 Support

Two Pupil Services personnel share administrative oversight for Section 504 matters, including attending Section 504 meetings for screening students, to review eligibility and to develop plans. In addition, they assist in the coordination of related activities. The two individuals have substantive responsibilities in areas in addition to Section 504. Some parents expressed concern that these individuals, who are not school-based, were responsible for monitoring their children’s Section 504 plans. Although some school-based personnel expressed support for this structure, others indicated that with appropriate training the function could be performed by school staff who attend the meetings. An alternative approach would be to assign each school at least one individual who can act as the principal’s designee to become very familiar with the relevant procedures. Principals should be accountable for ensuring that the procedures are followed upon their finalization and provision of training. PCG has seen this model work for many districts across the country.

Staffing Patterns & Usage

Teaching and learning for students receiving special education services are affected by district staffing patterns and staff usage. The Urban Special Education Leadership Collaborative has collected data to provide a general understanding of urban school district staffing levels in the following areas: special educators, paraprofessionals, speech/language pathologists, psychologists, social workers, nurses, occupational therapists and physical therapists.¹⁰⁸ PCG supplemented this information with data from special education reviews conducted by the Council of the Great City Schools or PCG.

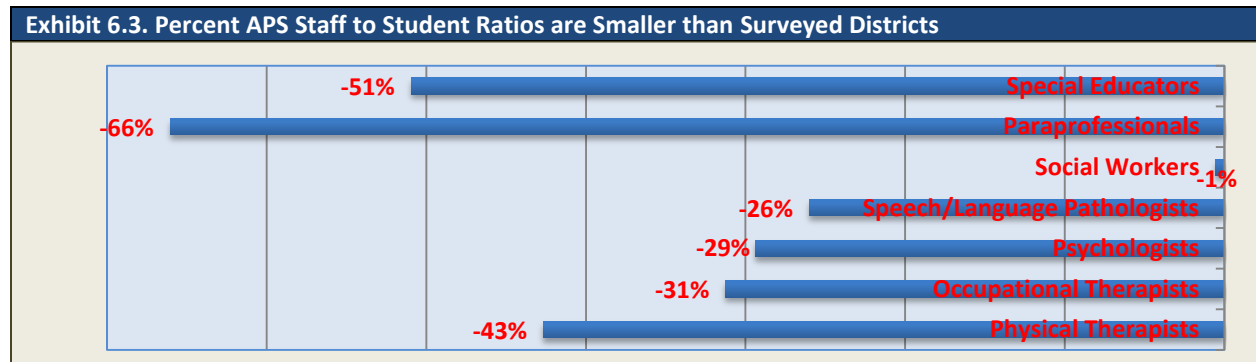
The survey data was used to calculate ratios for students with an IEP (and all APS students) to the number of personnel in each area. This calculation does not reflect any state caseload or workloads considerations or planning factors, which would be significantly different for each district and would prohibit any meaningful comparison. The survey data do not give precise comparisons among districts and results must be used with caution. District data are not uniform (e.g., including/excluding contractual personnel) and are affected by varying levels of private/public placements to provide special education/related services. The data is not provided to imply that staffing decisions should be predicated on these norms. However, the data is a tool for comparing staffing ratios in urban school districts and can identify areas for further exploration and study.

¹⁰⁷ The 504 part-time coordinators are included in the 23 psychologist total. The part-time homeless liaison is included in the 16 social worker count.

¹⁰⁸ The Urban Special Education Leadership Collaborative is a network of special and general education leaders who work together to improve outcomes for students with disabilities in urban schools. APS is not a member of the Collaborative.

Overall Comparisons

Based on APS data provided to the Core Team, APS personnel to student ratios are smaller than the average ratios of all surveyed districts in all areas except for psychologists. As illustrated in Exhibit 6.3, compared to all surveyed districts, the smaller average ratio of students with an IEP per provider are as follows: special educators (-51%); paraprofessionals (-66%); speech/language pathologists (-26%); psychologists (-29%); occupational therapists (-31%); and physical therapists (-43%). The social worker ratio is just about the same as the other districts (1% smaller). Appendix M contains staffing data for each district in the survey; a detailed summary of this information follows.



Special Education Teachers and Special Education Assistants Comparative Staffing

As shown in Exhibit 6.4, APS has an overall average of 8.6 students with an IEP (including those with speech/language needs only) for each special educator. This average is 6.4 students below the 15-student average of all districts responding to the Collaborative’s 2010 survey, ranking APS as 3rd among the 50 responding districts. The district has a larger overall average of 11 students with an IEP for each paraeducator, 5 fewer students than the urban district average of 16 students and ranking APS as 12th of the 50 responding districts.¹⁰⁹

Exhibit 6.4. Average Number Students with an IEP for Each Special Educator and Paraeducator

Areas of Comparison	Special Educators	Paraeducator
Number of APS Staff FTE	343	262
APS Student w/IEP-to-Staff Ratios	8.6:1	11:1
All District Average Ratios	15:1	16:1
Range of All District Ratios	7–37:1	7–56:1
APS Ranking Among Districts	3 rd of 50 districts	12 th of 50 districts

Paraprofessionals

During their focus group, paraprofessionals communicated the desire to play an integral role in educating the young people they serve, and expressed a need for more guidance, training and support. Based on staff surveys relevant to students with an IEP, 56% of respondents agreed that paraprofessionals were effectively assigned to support student learning (54% at elementary, 69% at middle and 63% at secondary school levels). 53% agreed that paraprofessionals were effectively utilized (50% at elementary, 70% at middle and 63% at secondary school levels).

¹⁰⁹ District ranking begins with the district that has the lowest average number of students to one staff person.

Related Service Providers

According to all parent survey respondents, 69% agreed that their children were receiving the number and amount of IEP related services. Staffing ratios and other data regarding related-services personnel are summarized below and illustrated in Exhibit 6.5:

- **Speech/Language Pathologists.** There is one APS speech/language pathologist for an average of 77 students with an IEP compared to the surveyed district average of 109 students, ranking APS as 16th of the 49 reporting districts.
- **Psychologists.** There is one APS psychologist for an average of 128 students with an IEP compared to the surveyed district average of 173 students, ranking APS as 16th of the 42 reporting districts.
- **Social Workers.** There is one APS social worker for an average of 186 students with an IEP compared to the surveyed district average of 187 students, ranking APS as 22nd of the 31 reporting districts that employ social workers.
- **Occupational Therapists (OT).** There is one APS OT for an average of 147 students with an IEP, which is much less than the surveyed district average of 433 students, ranking APS as 5th of the 48 reporting districts.
- **Physical Therapists (PT).** There is one APS physical therapist for an average of 492 students with an IEP, which is much less than the surveyed district average of 1,003 students, ranking APS as 7th of the 44 reporting districts.

Related Service Areas	Speech/ Language	Psychologists	Social Workers	OT	PT
Number of APS Staff FTE	38	23	16	20	6
APS Student w/IEP-to-Staff	77:1	128:1	186:1	147:1	492:1
All District Average Ratio	109:1	173:1	187:1	433:1	1,003:1
Range of All District Ratios	26-341:1	31-376:1	26-341:1	64-1685:1	128-2941:1
APS Ranking ¹¹¹	16 th of 49	16 th of 42	22 nd of 31	5 th of 48	10 th of 48

Nursing Services

The use of the Arlington County Department of Health Service (DHS) nurses provides APS with valuable and immediate resources to promote student health and wellness. Their expertise supports decision-making during eligibility, IEP and Section 504 meetings, and the daily management of health issues.

The nurses are allotted 20 hours at each elementary and middle school and 40 hours at each high school. Clinic Aides are dedicated to each school for a full day and can administer medication and first aid. Because the nursing staff is hired by the county, they are more familiar with resources available in the county and can more easily link parents and staff to outside services. It was mentioned, however, that communication between schools and the nurses is not always fluid. For example, nurses report to DHS but principals need to make requests of the nurses, such as sending letters to parents. If a letter needs to be sent, goes through several rounds of edits, from Student Services and DHS. Nurses have

¹¹⁰ APS currently has 36 Speech/Language Pathologists, 21 Occupational Therapists and 3 Physical Therapists.

¹¹¹ Districts are ranked with those having the smallest average number of students to one staff person, e.g., 15:1, to the largest average number of students to one staff person, e.g., 25:1.

different work days including snow and sick days. Allocation of funds for nursing supplies comes from DHS, and not the schools. Also, nurses may not get included in key school trainings.

Focus group participants expressed a need for additional health-related training, such as: nurses training teachers in health and wellness; providing nurses training on key school policy and procedural changes; and providing all relevant personnel training on Section 504. Also, because of the knowledge nurses and clinic aides have about available resources in the community, they feel that there is more to share with teachers and would like to come to classrooms more frequently.

Another concern raised in the survey relates to student health plans, which are kept locked in the Nurse's Office. When nurses are not at the school, there is the perception that the plans are not available for other school-based personnel who should have authority to access the information. Staff should be reminded that a clinic aide is always available and the building administrator has a key to the Nurse's Office. Due to HIPAA, all staff should not be privy to the information in the Student Health Plan, but there should be fields available in the Special Education Data System or Student Information System (SIS) so all members of the IEP or 504 teams know if the student has a Health Plan, the date the Health Plan was developed, and the relevant health-related issues.

General Issues

This section outlines APS's support for appropriate application of state test accommodations; support for the student transition between grade level schools and special transportation; the use of task forces/committees; and support for parent/family and school partnerships.

State Test Accommodations

School Test Coordinators (STCs) are responsible for ensuring students with disabilities receive appropriate accommodations on state tests. For students with an IEP, STCs rely solely on the accommodations page of the IEP specific to testing. While STCs have access to the hard copy of a student's entire IEP, including the testing page, they do not have access to the special education management system. For students with Section 504 plans, APS does not have an electronic system for these documents and so STCs must also rely on the paper plans.

Recently, concern was raised that testing accommodations were being included in other parts of the IEP and were potentially not being communicated to test administrators. The Virginia Department of Education confirmed that if a testing accommodation is included *anywhere* on the student's IEP, the district must ensure that accommodation is offered to the student.

There was also a noted concern that the level of specificity on some student's IEPs in terms of accommodations at the secondary level, particularly for those who attend summer school, are not sufficiently informative. For example, an IEP may note that a student needs accommodations in Algebra, but the student then enrolls in Geometry during summer school. STCs are not certain if this accommodation should carry across specific courses. Information was not provided for Section 504 plans; however, similar issues may exist.

To address these challenges, the Office of Special Education provided special educators with a "cheat sheet" to be utilized during IEP meetings to better understand how to write test accommodations. They noted that it was too early to determine if this tool had made a substantial impact.

Supporting Transition of Students between Grade Levels

The Special Education website has parent brochures with specific procedures to guide the coordination of students with an IEP who are transferring to a new grade level school.¹¹² The procedures pertain to the coordination of activities, including: parent visits to new schools; transition IEP meetings (with participation by all related service providers); revision of IEPs; submission of IEPs to the special education department for review; and transfer of student files.

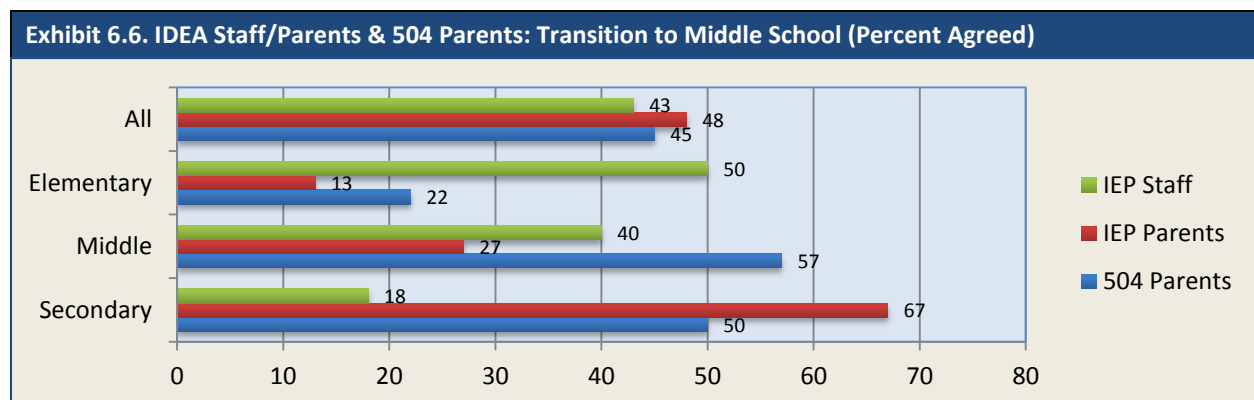
Several focus group participants discussed issues related to the movement of students to middle school and to high school. None of them were familiar with the web-based procedures for students with an IEP or any other guidance for students with Section 504 plans. Participants gave some examples of informal cooperation. When that occurred, the participants were positive about the outcomes; when it did not, the participants expressed concerns about the appropriateness of incoming IEPs or failure to provide services. Given the challenges associated with transitioning for most students when moving from one grade level school to another, this process is even more difficult for most students with Section 504 plans/IEPs. Intentional collaboration between exiting and incoming staff can provide a proactive and thoughtful mechanism for making this transition less difficult for these students.

Elementary to Middle School

In general, focus group and file review participants indicated that schools had adopted informal processes to help students with the transition from elementary to middle school. School tours were cited as one example of a commonly used transition activity for students. Parent focus group members noted differing behavior expectations and accepted social norms between schools. Parents of students with ADHD who knew their children would benefit from structured transition activities raised particular concerns that transition activities were not more formalized.

As shown in Exhibit 6.6 below, most survey respondents did not agree that effective services were provided for students transitioning from elementary to middle school. The following percentages of staff/parents agreed that effective transition services were provided:

- **IEPs.** 43% of staff and 48% of parents.
- **504.** 45% of parents.¹¹³



¹¹² <http://www.arlington.k12.va.us/page/2092>

¹¹³ The Section 504 staff survey did not ask about transition services in this manner.

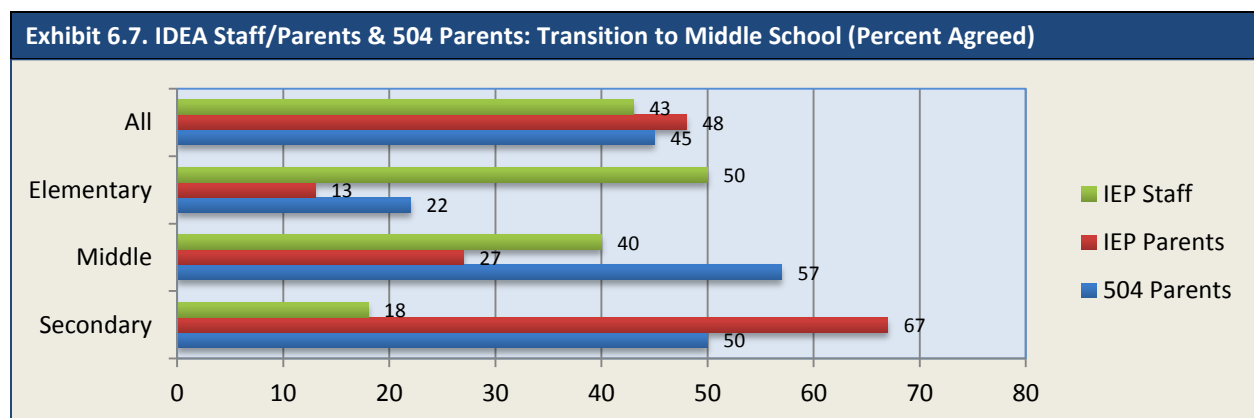
Middle to High School

Middle and high school representatives indicated that they collaborated on occasion to develop IEPs, although some school representatives expressed concerns that such a process was not formally in place. In some cases, the high school is invited to a meeting when there is a complex circumstance. When students transferred to a specific program, such as MIP-A and Interlude, this collaboration was also more likely to occur. Survey participants expressed the need for more consistent collaboration and professional development regarding IEP writing and helpful transition activities. However, respondents did express satisfaction with the amount of transition activities available to students including school tours and previews.

As reflected in Exhibit 6.7, most survey respondents also did not agree that effective services were provided for students transitioning from middle to high school. The following percentages of staff/parents agreed that effective transition services were provided:

- **IEPs.** 43% of staff and 48% of parents.
- **504.** 45% of parents.¹¹⁴

There was a noticed drop in perceived effectiveness of transition services between elementary to middle and middle to high school.



Based on additional responses from Section 504 staff, 19% agreed there is sufficient communication/collaboration among school personnel and parents to help students with Section 504 plans to make an effective transition into their schools. This percentage rose to 28% for students entering middle school; and fell to 15% for students entering high school.

The information above indicates that a more systematic communication process, including standard procedures and routine transition activities, would ease student and parent anxieties.

Transportation

The Transportation Department, run by Arlington Public Schools, transports approximately 9,000 students daily, including 420 students with special needs who receive transportation services. According to the Transportation Department, most students with special needs take a separate bus and in some instances, there is a need to have students ride in taxis to school. This is due to a large influx of students

¹¹⁴ Note there was a decrease in the number of responses to questions about transition, which may have skewed the results. The Section 504 survey for staff did not ask about transition services in this manner.

enrolled in pre-kindergarten special education programs; when these students ride a taxi they are accompanied by an attendant.

At the senior leadership level, communication between the Transportation and Student Services appears solid. The Transportation and Special Education Directors meet monthly to discuss upcoming trends and any issues needed to be resolved.

There is not a centralized transportation system to coordinate transportation between schools, either linked to eSchool+, the Special Education Data system, or the countywide transportation department. The absence of a system causes communication issues when transportation for a student is needed quickly and there is not an electronic form. An email is sent to the specialized transportation coordinator when an update to a student's IEP is made. While the transportation department seems to adapt quickly, having more efficient communication between schools and transportation will ensure that students are transported efficiently. It was mentioned that this process may change with the 2012-2013 School Year, but it will not be built into the Student Information System (SIS) or Special Education Data System.

Task Forces & Committees

APS has several task forces and committees led by key Student Services staff to address hot button issues that most affect the student body and community at large. Several are mentioned below.

Arlington Special Education Advisory Committee

ASEAC, which is mandated by the Virginia Department of Education, includes parents of children with disabilities and one APS teacher. Other APS staff members and service providers from the county collaborate with ASEAC, but serve only as consultants to the committee. Through ASEAC, APS has formed an exceptionally strong relationship with parents that appears to have been strengthened through the PCG review process and can be leveraged for future collaboration. PCG was impressed by APS's parent involvement throughout the Request for Proposal (RFP) development, selection process, and the review. As experienced by PCG, the involvement of parents in this process has served to enhance the comprehensive and inclusivity of the project.

By law, ASEAC:

- Advises the local school division of unmet needs in the education of children with disabilities;
- Assists in the development of long-range plans designed to provide needed services for children with disabilities;
- Participates in the development of priorities and strategies for meeting the identified needs of children with disabilities;
- Submits periodic reports to the school board; and
- Assists the school division in interpreting educational plans to the community for meeting the needs of children with disabilities.

Autism Committee

Based on materials received from APS, the Autism Committee meets on a regular basis to plan professional development and strategize for initiatives during the current and future school years. The Committee can cite specific accomplishments during the 2011-2012 school year as a result of their efforts that resulted in improved services for students. For example, the Multi-Intervention Program for

Students with Autism Spectrum Disorder (MIP-A) program was expanded to additional schools and classrooms and the amount of resources available to these programs was expanded. The Committee also continued a partnership with Virginia Commonwealth University's Autism Center for Excellence (VCU-ACE) to create a notebook for parents, guides for staff, and a social skills assessment currently being piloted throughout the county.

Mental Health Task Force

Focus group participants expressed concern that the Mental Health Task Force does not meet frequently and the direction of the initiative does not seem to be clear. Recently, APS began focusing their direction and working on mental health initiatives recently, their progress seems to be hindered by the amount of coordination involved with APS and Arlington County. This was reflected when APS staff explained how the Task Force is a partnership with the county and coordinating schedules across multiple agencies is a major factor that contributes to the lack of meeting times.

The Mental Health Strategic Plan created in collaboration with the Department of Health Services (DHS) in Arlington County during the 2008-2009 school year outlines key steps to address mental health issues. Outlined in the document is a plan for staff to be involved in cases pertaining to a student's mental health, professional development and activities to support communication and coordination between mental health organizations in the community. However, there was no evidence of follow-up documentation reflecting the extent to which any of the activities outlined in the Strategic Plan have been implemented. For example, it is documented that the nursing, psychology and social work staff should be involved in the IAT Process where appropriate. These groups felt that they were included in the IAT Process but maybe not to the extent as they could be compared to their level of involvement with the IEP Process. This implementation varies from school to school and perception of who should attend at the school level should be revisited to help align with district expectations.

ADHD Task Force

The ADHD Task Force created a strategic plan for 2010-2014. There are four key goals identified including communication to the community, professional development for staff, creation of IAT plans for students with ADHD, and establishment of a system of accountability to ensure students with ADHD are educated in the least restrictive environment. The goals outline an impressive plan for tackling this large issue. However, focus group participants explained that meetings for this committee seem sporadic though APS has set dates and times for when the committee will meet.

Overall, many staff members were unaware of the work being done by the task forces and committees to bring about positive change in the in the areas of mental health, ADHD and autism. PCG found little evidence of documentation distributed to school staff with information from these groups.

Parent/Family & School Partnerships

The following provides feedback shared by parent focus group members that supplements the previously described parent survey.

Parent Resource Center (PRC)

The Parent Resource Center offers an invaluable service to parents who are seeking guidance or support in navigating special education policies and procedures. They have developed numerous user-friendly materials for parents. It is staffed by APS employees, one of whom is bilingual. Listservs that are initiated and managed by parents and other communication forums also exist to promote knowledge sharing among parents.

Parent Groups

APS parents of students receiving special education services are exceptionally active and engaged. As such, there are a number of groups that help to support their activities.

- **SEPTA.** The Special Education Parent Teacher Association (SEPTA) is a community-wide organization that focuses on the needs of families having children with special needs. Arlington SEPTA is the first Special Education PTA in the Commonwealth of Virginia and its mission is to bring together families who have an interest in special education and to provide a forum for them to share their experiences.
- **Special Education Parent Liaison Project.** Third, the Special Education Parent Liaison project is a joint project of APS's Parent Resource Center (PRC) and the SEPTA. The project's goal is for each elementary, middle, and high school in Arlington to have at least two parent volunteers who will serve as Special Education Parent Liaisons to support and encourage the flow of information between each of the schools, the PRC, and SEPTA. Liaisons share PRC and SEPTA information with their schools, and serve in an advisory capacity, providing ideas for trainings and materials, and input from individual school communities. The Parent Liaisons group meets once or twice annually. Liaisons serve as points of contact for families interested in connecting with another parent of a child with special needs in individual schools.

There are four active listservs, all managed by parents to address the following issues: ADHD, reading, ASD, and Asperger's.¹¹⁵ Communities have formed around these groups and there are countless examples of parents helping parents. APS gives parents of children with Asperger's credit for helping to identify ways in which the district's services for these children could be strengthened.

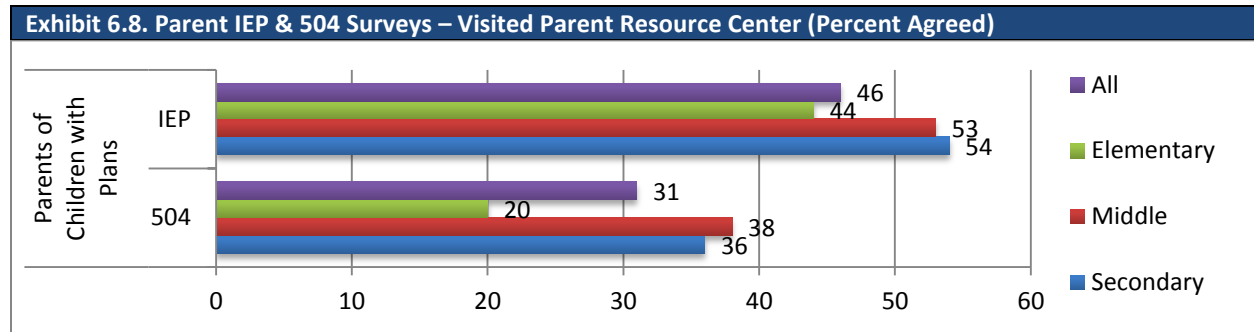
Parent Resources

While there are a number of different resources for parents in the district, the Parent Resource Center is highly regarded and referenced the most frequently. The PRC's purpose is to provide parents the support and information they need as they work with the school system to identify and meet their child's unique learning needs. The Center offers support and assistance, a lending library, a parent newsletter, and parent training workshops; and serves as an information and referral source for families and staff members. A PRC bilingual staff member is available to support Spanish-speaking parents.

Information about the proportion of parents who have visited the PRC was provided through the parent surveys conducted to inform PCG's evaluation. As illustrated in the exhibit below, a larger percentage of parents having children with an IEP visited the PRC than did those of children with Section 504 plans.

- **IEPs.** 46% of parents having children with an IEP reported they had visited the PRC; more than half (54%) of parents with secondary school children reported a visit. The elementary school level reported the smallest percentage of visits (44%).
- **504.** 31% of parents of children with Section 504 plans reported a visit to the PRC; the parents of middle school children had the highest percentage of visits (38%); and the elementary school level reported the lowest percentage (20%).

¹¹⁵ ASD refers to Autism Spectrum Disorder.



Parent focus group members suggested a number of ways in which more parents could receive information about the PRC and become aware of its resources. They noted that the more parents learned from the district, the more likely they were to be engaged and be supportive parents. For example, they noted that distributing information about the PRC at every IEP or eligibility meeting might expand knowledge of and encourage access to the Center. In addition they suggested:

- More parent-friendly and informative material to be available at the schools.
- Utilize the public television system to, e.g., hold “mock IEP meetings” so that parents can learn how to become a meaningful participant.
- Develop a guide for parents outlining the IEP process, key terminology and frequent questions in both document and video format. Similar guides should be made available for 504 and IAT.

The district is moving the PRC from Ballston to South Arlington for the 2013-14 school year.

Special Education PPIM, Electronic IEP System & Website Analysis

The information below reflects PCG’s review of APS’s Special Education Policy and Procedures Implementation Manual (PPIM), documenting and determining educational setting, APS’s electronic IEP system, and Student Services websites.

Special Education PPIM Review

APS provided PCG a copy of its Special Education PPIM, which begins with a copy of the state’s special education regulation and is followed by information in 28 appendices (not including six that are not in use). PCG reviewed this information to determine the extent to which the PPIM provides information that is comprehensive, reader-friendly and has easily accessible format. Detailed guidance for improvement and overall recommendations are provided in Appendix AA.

Overall Comments

The following are overall comments about the PPIM:

- **Organization.** Although APS has developed information regarding the district’s local practices, it is provided in a series of appendices that are not ordered in any particular manner. For example, preliminary information about the age of eligibility for special education services is not provided until the document’s Appendix M; multicultural assessment procedures are not provided until its Appendix EE; VA regulatory definitions are provided in the main portion of the document and repeated at the PPIM’s Appendix Q.

- **Table of Contents & Page Numbering.** The PPIM does not have an overall table of contents with page numbers for easy reference; page numbers in the PPIM are not sequential throughout all appendices, making it difficult to locate each appendix.
- **Formatting.** There is no consistent formatting for the information included in the appendices; sometimes the information is outlined and other times it is not.
- **Availability.** The PPIM is not posted on APS's website. Focus groups and case studies review participants noted that many teachers and administrators were either not aware of its existence nor use it as a resource on a regular basis.
- **APS Website Resources.** PCG provided specific information in Appendix AA on the Special Education or Pupil Services webpages, which provide excellent resources that can be summarized and/or linked to a comprehensive PPIM.

Additional Areas for Inclusion in the PPIM

PCG also provided the following list of areas that were not addressed in the PPIM:

- Roles and responsibilities of various individuals involved in administering the special education process, e.g., various central office personnel, principal, case managers, special educators, general educators, paraprofessionals, related services personnel, etc.;
- Special education caseload staffing requirements;
- Student age of majority;
- Students placed by parents in private schools because their parents do not believe they are receiving an appropriate education;
- Procedural safeguards relevant to the removal of students from school because of suspensions or expulsions;
- Informal and formal dispute resolution; and
- Confidentiality of records.

Documenting & Determining Restrictiveness of Educational Setting

As reflected in Exhibits 1-3, the U.S. Department of Education and states monitor the placement of students based on a continuum of services that includes three categories for students receiving special education attending regular schools: percentage of time a student is educated in a general education class (at least 80% or more of the time; between 79 and 40% of the time; and less than 40% of the time).

IEP Inclusion of Time/Percentage of Time Outside of General Education & Location of Services

As discussed in PCG's Interim Report #1, APS's electronic IEP system does not calculate or document the overall percentage of time a student is to receive instruction/services in a general education class, and the consideration of placement options does not include general education classes and special classes. Furthermore, according to case study participants, the field for location of services in the IEP Online system is optional. The participants also reported inconsistent directions for documenting on a student's IEP the provision of co-teaching by a special educator in general education classes: one special educator was told not to put in significant time for co-teaching and another was told to document this

information. Without this information, there is no documentation to reflect the IEP team's intention for the provision of services for a student.

Resource vs. Self-Contained Services

Another complicating factor is that the [APS Continuum of Services Options- Vertical Planning Chart](#) categorizes resource services as less than 15 hours of special education services and self-contained as more than 15 hours of such services. While this distinction may be used for other purposes, it is not related to the Federal/State continuum of services model. The 15 hour distinction pertains to a specified *amount* of special education services a student receives; it has no relationship to the *location* of services that is typically associated with the resource service/self-contained nomenclature.

Overall Impact

These factors combine to make it difficult for local school personnel and parents to understand how their IEP team decision-making process regarding the amount of time a student is to be educated in general education classes is aligned with state/federal monitoring and could impact the accuracy of data collected and reported. The concept and accurate documentation of location of services is important to ensure that students are educated to the maximum extent appropriate in general education classes to directly access core curriculum taught by highly qualified teachers with subject matter expertise. The amount of special education services (and supplementary aids/services) students are to receive within general education classrooms is important for ensuring that special educators have caseloads that enable them to provide the support indicated as appropriate within that environment.

IEP Electronic System

During its evaluation, PCG found the following data issues related to APS's IEP electronic system that impacts its usage and effectiveness.

- **Integration of Data.** The SIS and the IEP system are not fully integrated to eliminate manual entry of duplicate information.
- **Data Fields.** There are not sufficient data fields to enable all relevant information to be entered into the IEP system so there is little or no supplemented information on paper, including information indicating a student has a health plan.
- **Expandable Text Boxes.** Text boxes do not expand so that space is limited arbitrarily; and dropdown menus are not sufficient to facilitate consistent data entry and analysis.
- **Location of Service.** The location of service field is optional.
- **Goal Bank.** There is no goal bank for actionable and measurable goals or allowable accommodations for class or SOL assessment.
- **Note Page.** A note page is not available to document information on related forms.
- **Reports.** All relevant data stored in the IEP system is not used to the maximum extent to prepare user-friendly reports by school, grade level, class, program, and other categories to inform decision-making at all APS levels.

Student Services Websites

The Special Education and Pupil Services websites are rich with information that would be relevant to various sections of a comprehensive PPIM. The webpages are well designed, clear and easy to follow for parents, staff and the public.

However, some information on these websites might not be easily located and in some cases topics are not intuitively found under Special Education or Pupil Support webpages. For example, information on IATs and reading services is on the Special Education webpage and Section 504 is on the Pupil Services webpage; and a few topics, including ADHD and mental health services, are on both webpages. As discussed above, the reading services webpage would have a general audience that may not think to look at the Special Education website for this information.

Website Information about the IAT Process

The APS website does contain some information about the IAT process but it is not readily accessible unless the interested party knows to search for this topic on the Special Education website. Although the IAT process may benefit all students, including those receiving special education or a Section 504 plan, its major users are students without a disability. Thus, it would not be intuitive to search for information about the IAT process under the heading of Special Education.

Useful information about reading is also available in the Special Education website under the heading of "Reading Services." Under Reading Services, the following information is provided about APS research-based intervention programs:

Arlington Public Schools (APS) has a variety of researched-based intervention programs available. It is our goal to provide reading intervention to any student who is in need of remediation in one or more areas of phonemic awareness, phonics, vocabulary, comprehension and fluency. Students receive intervention based on individual needs to master specific literacy skills to become successful readers. These programs may also supplement the core reading curriculum offered in APS. Additionally, each of the intervention programs utilizes assessment to determine specific individual needs and allows teachers to monitor student progress.¹¹⁶

In addition, links are provided to the district's English Language Arts website and information on local assessments. Parents are advised to contact their child's special education teacher or coordinator if they have questions about their child's reading programs. A few individuals within the Student Services department are listed as additional staff resources.

The Reading Services webpage also has links to: Programs, Resources, and Frequently Asked Questions. The Reading Programs page lists various research-based reading intervention programs used by the district. A few specific programs are mentioned, along with the Reading Intervention Chart discussed above, which includes interventions for students with and without disabilities as well as those solely for students receiving special education services. Finally, Frequently Asked Questions provide 27 answers to questions parents may have about their child's reading progress and how to obtain assistance; several questions pertain to the IAT process.

¹¹⁶ See Section 2. IATs: Administration & Implementation - Use of Interventions, for an assessment of APS's use of research-based interventions.

While there is some good information about IATs and Reading Services, because they are accessible only under the webpage for Special Education it is not likely that parents/staff will find it easily. Also, their association with the Special Education webpage reinforces the perception that these areas are designed for students with an IEP.

Opportunities for Improvement

Student Services Organization

- **Directors.** The Director of Special Education supervises almost 100 individuals and the Director of Pupil Services almost 50. Reporting lines for the various supervisors who report to the Directors can be improved for more effective alignment and coordination. This organizational structure makes it very difficult to produce effective staff evaluations of school-based related services providers.
- **Special Education Coordinators.** The number of special education coordinators enables them to visit approximately 1 to 1.5 days per week each school to which they are assigned to support. With the limited amount of time available for each school visit, a disproportionate share is devoted to facilitating special education meetings and addressing compliance issues. These activities leave little time to provide active and meaningful support to teachers through professional development and coaching, and to collaborate with school administrators around service delivery and instruction for students with disabilities. Other school districts have addressed this issue by increasing the accountability of principals for the administration and operation of special education services in their schools. Such accountability has included responsibility for ensuring that special education meetings are facilitated effectively, and that decisions are made and documents are produced in a compliant manner. These expectations have been accompanied by sufficient professional development and support during the transition period. When such a system is in place, coordinators have more time to support each school's instructional activities and are available to help focus on more complicated compliance issues.
- **Section 504 Supports.** Two Pupil Services personnel share administrative oversight for Section 504, including attending routine Section 504 meetings, in addition to other non-Section 504 functions. This structure relies on central office personnel to perform duties other school districts expect of school-based staff.
- **Staffing Patterns and Usage.** Teaching and learning for students receiving special education services is affected by district staffing patterns and staff usage. PCG calculated ratios for APS students with an IEP (and all APS students) to the number of personnel in each area and compared the results to external special education and related services personnel survey data ratios for 50 urban school districts across the country. Compared to all surveyed districts, the smaller average ratio of students with an IEP per provider are as follows: special educators (-51%); paraprofessionals (-66%); speech/language pathologists (-26%); psychologists (-29%); occupational therapists (-31%); and physical therapists (-43%). The social worker ratio is just about the same as the other districts (1% smaller).¹¹⁷ (Appendix M)
- **Nursing.** The use of the Arlington County Department of Health Service nurses provides APS with valuable and immediate resources to promote student health and wellness and expertise to support

¹¹⁷ The student/staff ratio calculation does not reflect any state caseload or workloads considerations or planning factors, which would be significantly different for each district and would prohibit any meaningful comparison. The survey data do not give precise comparisons from district to district and results must be used with caution. The data is a tool for comparing staffing ratios in urban school districts and can identify areas for further exploration and study

students with special needs. Communication between schools and the nurses, however, is not always fluid and results in their most effective use; and the need to coordinate schedules, etc. controlled by two different agencies adds complications. Also, student health plans are not accessible to all personnel with an appropriate need for information.

General Issues

The following general issues pertain to students with special needs.

- **Testing & Accommodations.** School Test Coordinators (STCs) who are responsible for ensuring that students with disabilities receive appropriate accommodations on state tests do not have access to the electronic IEP system to easily identify accommodations needed for each student.¹¹⁸
- **Supporting Transition of Students between Grade Levels.** Focus group participants were not aware of any APS procedures for supporting students with special needs who transfer to a new grade level school. Most staff and parent survey respondents reported a lack of effective coordination for students transitioning from elementary to middle school and from middle school to high school. A more systemic communication process, including standard procedures, and routine transition activities, would ease student and parent anxieties.
- **Transportation.** APS does not have a centralized transportation system to coordinate transportation between schools and the countywide transportation department. The absence of a system causes communication issues when transportation for a student is needed quickly and there is not an electronic form that can be filled out.
- **Task Forces & Committees.** APS has several task forces and committees led by key student services staff to address hot button issues that most affect the student body and community at large. Overall, many staff members were unaware of the work being done by the task forces and committees to bring about positive change in the in the areas of mental health, ADHD and autism. There was little evidence of documentation that went out to school staff with information from these groups.
- **Parent Resource Center.** While there are a number of different resources for parents in the district, the PRC is highly regarded and referenced the most frequently. The PRC provides parents the support and information they need as they work with the school system to identify and meet their child's unique learning needs. Less than half of parents of children with IEPs or Section 504 plans indicated they had visited the PRC. Parent focus group members provided several suggestions for increasing parent awareness and usage.

Special Education PPIM, Electronic IEP System & Website Analysis

The information below reflects PCG's review of APS's Special Education Policy and Procedures Implementation Manual (PPIM) and the Special Education and Pupil Services websites.

Special Education PPIM Review

APS's Special Education PPIM contains the state's special education regulation and 28 appendices (not including six that are not in use). The PPIM does not include a comprehensive compilation of requirements pertaining to special education and its operation, and is missing important components. The appendices are not ordered in any particular manner; the document does not have a table of

¹¹⁸ APS does not have an electronic system for Section 504 plans.

contents and page numbers do not run sequentially; it is not posted on APS's website and many teachers and administrators were either not aware of its existence or did not use it as a resource on a regular basis. The absence of a user-friendly on-line PPIM, with links to more detailed information and resources, has a detrimental effect on APS's effective operation of special education services.

Documenting & Determining Restrictiveness of Educational Setting

There are two issues related to how APS calculates and documents students' educational setting on IEPs: the amount and percentage of time a student is educated in general education setting; and the distinction between resource and self-contained services, which is not aligned with Federal/State categories. In addition, there are inconsistent directions for documenting on a student's IEP the provision of co-teaching by a special/general educator in general education classes.

These factors combine to make it difficult for local school personnel and parents to understand how their IEP team decision-making process regarding the amount of time a student is to be educated in general education classes is aligned with state/federal monitoring and could impact the accuracy of data collected and reported. The concept and accurate documentation of location of services is important to ensure that students are educated to the maximum extent appropriate in general education classes to directly access core curriculum taught by highly qualified teachers with subject matter expertise. The amount of special education services (and supplementary aids/services) students are to receive within general education classrooms is important also for ensuring that special educators have caseloads that enable them to provide the support indicated as appropriate within that environment.

IEP Electronic System

The following data issues related to APS's IEP electronic system impact its usage and effectiveness: insufficient integration of data and data fields; non-expandable text boxes; optional location of service field; no automated bank for goals or allowable accommodations; no note page for information available on related forms. In addition, all relevant data stored in the IEP system is not used to the maximum extent to prepare user-friendly reports to inform decision-making at all APS levels.

Website Review

- **Student Services.** Although the Special Education and Pupil Services websites are well designed, clear and easy to follow for parents, staff and the public, some of the information is not easily located and in some cases topics are not intuitively found under Special Education or Pupil Support webpages.
- **IAT & Reading Services Information.** Although the APS website contains some information about the IAT process and Reading Services, neither are readily accessible unless the interested party knows to search for this topic on the Special Education website. Also, their association with the Special Education webpage reinforces the perception that these areas are designed for students with an IEP.

RECOMMENDATIONS

Central Office Communication, Collaboration & Organization

- 7. Maximize collaboration between personnel in the Department of Instruction and Student Services, and within Student Services, to facilitate the coordination of all APS resources to support teaching and learning.**
 - a. Instruction & Student Services.** The recommendations for the implementation of an MTSS framework and for inclusive education instruction and support, which are culturally and linguistic appropriate, requires collaborative teamwork by Instruction and Student Services personnel. Have the Assistant Superintendent for Instruction and the Assistant Superintendent for Student Services establish a communication and management protocol designed to carry out the recommendations referenced in this report.
 - 1) MTSS.** Have the Assistant Superintendent for Instruction provide the leadership for MTSS. MTSS is an inclusive initiative and incorporates students with disabilities and ELLs. Having Instruction lead the effort visibly communicates that the framework is based in general education, is designed to improve teaching and learning, and is not designed as a path to special education eligibility.
 - 2) Inclusive Education.** Have Student Services and relevant Instruction personnel support the effort. Although Student Services will likely provide the bulk of support needed to formulate planning and support for inclusive education, the leadership of Instruction is necessary to communicate that this model relies on general educators to differentiate instruction and collaborate with their special education/related services peers.
 - 3) Protocol.** To support this interaction, establish a protocol that establishes expectations for how personnel from the two Departments will communicate and share information, develop materials, cross-train their personnel, provide technical assistance and professional development, link information on their websites, monitor and take follow-up action, etc.
 - 4) Planning.** Develop/execute plans to improve academic achievement and positive behavior outcomes through strategies including but not limited to support for: instruction and professional learning; district and school-based teams that review student data and activities designed for improvement; and principals and staff members.
 - 5) Websites.** Expand access to reading information by linking all APS webpages, including those relevant for ESOL/HILT, to Instruction, Special Education and Section 504 sites. Add to current information as new resources for reading interventions and other areas are developed through MTSS and inclusive education implementation. Include all manuals, checklists, guidance documents and forms. To the extent possible, have information available in Spanish and other high use languages.

Organization of the Department of Student Services

- 8. Implement organizational changes to Student Services to provide a more reasonable supervisory scope of responsibility and more focused support for schools to achieve the outcomes desired for inclusive schools.** These recommendations are provided to trigger a lively discussion about ways in which the organization may improve its support of schools to enhance educational outcomes for students with disabilities. It is anticipated that representatives from the Department of Instruction,

schools and parents will participate to discuss needs, goals and the best way to meet them. After the revised organization is established, produce an organizational chart that includes all personnel in the organization, including administrative assistants, clericals, etc., and numbers in each organizational group, to facilitate a better understanding of the Department's structure. Produce a communication flow chart for who to call for specified purposes. Distribute the information broadly to central office/school personnel, parents, and the community and establish a link to the information on the APS website.

a. Special Education Services

1) School Liaisons.¹¹⁹ Assign an appropriate number of personnel to serve as a liaison between the Department of Student Services and the schools they support to have timely and sufficiently frequent consultations with principals/designees about their service delivery model, planning for improved instruction, oversight of special education, and be a resource for matters requiring a high level of expertise. Have the liaisons be the primary contact for all of each school's special education and Section 504 issues. Consult with a representative group of principals, key instruction administrative personnel who understand school operations, and the budget office to determine the amount of time each school requires for sufficient support and the overall number of liaisons required. The primary work of the school liaisons would be to focus on teaching and learning and support for inclusive instruction. For this process to work effectively, the liaisons' role should not include attendance at all routine eligibility and other special education meetings. They may be involved in eligibility and special education meetings that are particularly difficult and require a higher level of expertise otherwise available at the school.

2) Research-based Instruction Specialists.¹²⁰ Have a group of individuals who continuously research and share information, provide back-up support for liaisons, and oversee professional development activities for specialized instruction in critical areas, such as:

- Pre-K education;
- Identifying, assessing and instructional strategies/interventions for ELLs with disabilities and other students with language acquisition needs;
- Intensive interventions for academic, social, emotional and/or communication needs;
- Differentiated instruction, co-teaching and other inclusive education supports;
- Curriculum and instruction aligned with alternate assessment standards;
- Assistive technology;
- Low vision/blind and low hearing/deaf support;
- Postsecondary transition activities and support; etc.

Ensure that this group is able to provide support to the school liaisons (and school staff when necessary) and support vertical and horizontal consistent standards-based practices. Have these content specialists communicate research-based interventions that are not based on a student's disability category or specialized program but on a constellation of learning characteristics, strengths and needs that students bring. Such an approach will enable research-based instructional strategies to reach all students with relevant

¹¹⁹ The term "school liaison" is used as a generic term only for purposes of describing this personnel area.

¹²⁰ The term "research-based content specialist" is used also as a generic term only for purposes of describing this personnel area.

characteristics – not just those with a specific disability label. As these content specialists share their knowledge with school liaisons, the liaisons will be better able to address more school-based issues and any special program issues in their assigned schools directly.

- 3) **Operations.** Have the above groups of personnel share their operational responsibilities using estimates about the time necessary to perform these operational duties and other responsibilities to determine the full-time equivalent staff required and their respective roles.

b. Pupil Services

- 1) **Related Services Personnel.** Group support for all personnel who provide direct services to students under Pupil Services, i.e., counselors, psychologists, social workers, substance abuse and attendance specialists, and homeless.

- a) **Personnel to Student Ratios.** Ensure the use of appropriate ratios for related services personnel to student and the equitable allocation of personnel to schools.

- b) **Professional Development & Materials.** Ensure related services personnel are included in all professional development activities and have access to appropriate and up-to-date materials.

- c) **Personnel Evaluations.** Have principals evaluate related service providers who support students at their schools, and have Pupil Services administrators coordinate the results and resolve differences of opinion between principals and with Pupil Services. There is a relatively small number of Pupil Services supervisory personnel available to evaluate related services providers and observe each at his/her assigned schools. For this recommendation to be implemented effectively, provide principals with sufficient training to conduct the evaluations and have Pupil Services supervisors address any specific aspects of the evaluation process that requires their expertise. In addition, have Pupil Services supervisors provide additional support to principals on a case-by-case basis, e.g., the principal is unsure about a provider's abilities and/or performance.

- 2) **Program Support.** Group individuals responsible for hearing/vision screening, attendance, homeless, home instruction, medical and psychological transfers and student records.

c. Procedural Support & Compliance. Have a group of individuals who support the Assistant Superintendent of Student Services with expertise in Section 504, IDEA, and related requirements. Enable this group to have access to data to identify compliance trends and patterns of concern. With the support of others, have this group be responsible for drafting written guidance to promote common language and practices; support professional development; and coordinate compliance activities.

d. Supervision of Various Groups. Based on the results of these groupings, work with Human Resources and Budget to determine the scope of supervisory and other responsibilities to determine position titles and the number of administrative positions required to perform expected responsibilities.

e. Implementation Plan. To facilitate a well-managed and orderly transition, develop and execute a comprehensive implementation plan, including the following components:

- 1) **Central Office.** Include sufficient initial and ongoing training to ensure personnel have the knowledge they need to carry out their responsibilities. Develop a process for obtaining feedback to identify any issues that may arise and to provide additional support when

needed. Include consideration of how Student Services personnel will be integrated into Instruction activities and strategic planning.

- 2) **Schools.** To enable schools to facilitate most Section 504, special education eligibility and other meetings and take on the LEA representative role, incorporate in the plan important considerations from school and parent stakeholders.
 - 3) **Written Guidance.** Ensure that there is written guidance, e.g., comprehensive Student Services manual, that promotes a common language and understanding of standards and expectations.
 - 4) **Professional Learning.** Include in the plan a comprehensive professional learning component to explain the basis for changes at the central office and school levels and enables all personnel to carry out their roles and responsibilities.
 - 5) **Time Frame.** The time frame for implementation should be aggressive but provide sufficient time for preparation.
9. **Review the ratios for related services personnel and the process for determining student need for these services.** As part of this review, include an analysis of caseload and workload, and related state requirements. Ensure there are clear and objective standards in place as well as a process for oversight and accountability for results. Include these standards in the APS Student Services manual.
10. **Facilitate better communication between DHS and Student Services for nursing services by hosting monthly meetings.** Review and address communication and any other issues to minimize coordination problems relating to the dual agency interaction. Work toward a plan to incorporate nurses and nursing staff in the classroom when able to support health education activities.
11. **Implement activities to support paraprofessionals and enable them to maximize their assistance to students and teachers.** Develop models to enhance communication both among paraprofessionals, and between paraprofessionals and assigned teachers to bolster their effectiveness in the classroom, and enhance their professional learning. As part of this process incorporate the following activities.
- a. **Professional Learning.** Create a more robust and paraprofessional-centric professional learning program that includes, but is not limited to: inclusion and differentiation; training in best practices for working with students on the autism spectrum; training in positive interventions and social skills; training in continuum of services and inclusive classroom work; training in crisis intervention and bullying; knowledge of assistive technology resources and usage; knowledge of Spanish, math, and reading techniques; understanding of an IEP, accommodations and goals, and progress monitoring. Explore relationships with local colleges and universities to create college study opportunities that would provide paraprofessionals with skills and knowledge to supplement APS training. A degree program with potential full-time teaching in APS may be a goal of this collaboration.
 - b. **Family Communication.** Provide opportunities for paraprofessionals to assist their assigned teacher with family communication.
 - c. **Access to IEPs.** Ensure access to assigned students' IEPs.
 - d. **Monthly Meetings.** Schedule monthly meetings for paraprofessionals within specific groups as well as schedule system-wide meetings through which paraprofessionals can network, share best

practices and resources, and listen to invited guest speakers.

- e. **Planning Time.** Schedule planning time with the paraprofessional and assigned special and regular education teachers.
- f. **Collaboration.** Support models for teachers and paraprofessionals to share knowledge and problem-solve, e.g., using a website with links to an online chat room, professional development topics and dates, and other relevant resources.

Testing & Accommodations

- 12. **Provide specific professional development to staff to ensure that they write testing accommodations in a manner that can be easily found and interpreted by school test coordinators on the IEP & Section 504 plans.** Clarify that accommodations are not “subject” specific but need to be related to the content being accommodated. Determine if it would be appropriate to provide Student Testing Coordinators (STCs) access to the district special education management system.

Supporting Transition of Students between Grade Levels

- 13. **Review and revise as necessary any written standards regarding the transitioning of students from one grade level to another, including the manner in which MTSS, Section 504 and IEP plans are to be developed collaboratively by staff from the two schools.** Communicate the standards and have coordinators monitor their effectiveness and usage.

Transportation

- 14. **Improve transportation services for students with disabilities by taking the following actions.**
 - a. **Database.** Develop a special transportation database for schools to enter online data relating to current special transportation forms and link fields to the SIS. This linkage not only ensures strong communication between schools and the transportation department, but having an online form ensures that the schools get essential information from parents, including address changes, alternative drop-off locations, and emergency contact information.
 - b. **Vans.** To reduce reliance on the use of taxis, assess the costs and benefits of using vans instead. If the use of vans could provide a cost-effective mode of transportation, take the necessary follow-up steps.
 - c. **Policies/Procedures.** Create policies and procedures and training around specialized transportation and effectively communicate them to staff and parents. Include information about adding new students to routes and the expected reasonable turnaround time for this process.
 - d. **Planning.** To facilitate effective transportation planning, have Student Services include forecasts for program expansions (e.g., contract services and APS schools) during meetings with the Transportation Department to provide them as much notice as possible and to facilitate cost-effective and reasonable transportation.

Task Forces & Committees

- 15. **Provide consistent information to APS staff and ASEAC about task force activities and incorporate their findings and recommendations into special education team meetings several times each**

school year. Solicit feedback from staff regarding the information and any related needs for professional learning. Without the task forces/committees becoming too large, rotate inclusion of principals and special/general educators from a cross-section of schools to obtain a broader perspective of needs and recommendations. Add task forces as issues under discussion and require greater feedback and study to support implementation.

Parent, Family & School Partnerships

16. Explore the following activities to promote parent, family and school partnerships.

- a. **Parent/Family School Collaboration.** Establish standards developed with the PRC, ASEAC and SEPTA for expectations regarding parent/family school collaboration. Base these standards on research applicable to this subject, such as: *Fostering Parent and Professional Collaboration Research Brief*, Technical Assistance ALLIANCE for Parent Centers, National Parent Technical Assistance Center; and *Encouraging Meaningful Parent/Educator Collaboration: A Review of Recent Literature*, Center for Appropriate Dispute Resolution in Special Education.^{121,122} As part of this process, consider tensions between parent expectations and legal standards and how this collaboration can move to improved communication. Once the standards are established, collaborate with the PRC, ASEAC and SEPTA for broad distribution.
- b. **Parent Resource Center (PRC).** With parent and family stakeholders, meaningfully explore ways to increase parent awareness and use of the PRC. For example, have staff distribute information about the PRC at special education and 504 meetings IEP and offer words of encouragement to parents to support their involvement.
- c. **Parent Guide.** Develop one-page informational guides for parents about the MTSS, IEP and 504 processes, key terminology and frequent questions. Consider using methods, such as webinars, videos, etc., to broaden information sharing.
- d. **Mock IEP Meetings.** Utilize the public television system to hold “mock IEP meetings” so that parents can learn how to be a meaningful participant.

Special Education Policy & Procedures Implementation Manual (PPIM)

17. Enhance understanding of APS special education policies and procedures by improving access to necessary information by taking the following actions.

- a. **Online Special Education SOPM.** Develop a comprehensive Special Education Standard Operating Procedures (SOPM) that establish all requirements necessary for the operation of special education and implementation of IEP-required services. Provide links to in depth information and resources, including other relevant manuals (e.g., Bridge), checklists, guidance, memorandums and forms. Ensure staff is available to update the PPIM regularly with current information. Include the areas described below.
 - 1) **Contents.** In the order that the special education process occurs, i.e., referral, evaluation, eligibility, development of IEP, etc., address the issues highlighted in this report:
 - a) **Eligibility.** Establish local operational criteria for determining a student’s disability in

¹²¹ <http://www.parentcenternetwork.org/assets/files/Parent%20and%20Professional%20Collaboration%20Research%20Brief%20-%20Final.pdf>

¹²² <http://www.directionservice.org/cadre/exemplar/artifacts/Encouraging%20Meaningful%20Collaboration.pdf>

areas reflecting over and under representation to ensure criteria provides sufficient guidance for decision-making. Revise eligibility forms to reflect these criteria to document whether assessment data and information show that a student meets all criteria for the disability under consideration. For students who are ELL, include sections that would support the documentation of information relevant to a student's language usage and its relationship to the disability criteria.

- b) **Consent.** When a parent does not consent to a child's receipt of initial special education services, the record should indicate that the student is eligible for services but that the parent refused to consent. Consider whether this is an issue that must be addressed in the electronic IEP system.
- c) **IEP Requirements.** Establish clear standards for the documentation of meaningful present levels of performance, consideration of student strengths and student academic/developmental/functional needs; and for how this information is aligned with measurable annual goals/objectives or benchmarks. Explain the relationship between the resource/self-contained nomenclature based on the 15-hour per week distinction, and Federal/State educational setting percentages of time students are educated in general education classrooms.
- d) **Educational Setting.** Provide a thorough description of Federal/State requirements relating to the provision of special education/related services in the least restrictive environment and research-based practices designed to promote inclusive education. Provide a clear explanation of Federal/State educational setting criteria and the calculation for determining the percentage of time a student is educated in the general education setting.
- e) **Co-Teaching.** Establish an expectation that co-teaching parameters be included in an IEP when the team intends for a student to receive services through this service configuration.
- f) **Related Services.** Specify clear and objective standards for the provision of related services for students with disabilities to benefit from their education.
- g) **Test Accommodations.** Clarify that accommodations are not "subject" specific but are related to the content being accommodated. Describe how to document a student's accommodations so that school test coordinators can easily find and interpret them.
- h) **Progress Monitoring.** Establish standards for monitoring student performance, including the frequency of monitoring and its documentation to reflect teaching effectiveness and learning growth. Establish standards developed for the MTSS process so that these standards provide for at least if not more frequent monitoring and comprehensive documentation for students with an IEP.
- i) **Issues Pertaining to Students with IEPs or Section 504 Plans**
 - i. **Nurse Participation in Meetings.** Establish standards for the participation of nurses in MTSS, Section 504 and IEP meetings for students with health issues to ensure issues are fully discussed and understood and to maximize informed communication between school teams and parents about health matters.
 - ii. **Transportation.** Develop standards for specialized transportation, including the reasonable amount of time required to establish new routes for students with

disabilities.

- j) **Issue Pertaining to Students with Special Needs.** Establish standards for encouraging parents to attend MTSS, Section 504 and IEP meetings and facilitating meaningful participation, especially for parents who are limited English proficient.
- 2) **SOPM Links & Updates.** Provide links to in-depth information and resources, including other relevant manuals (e.g., Bridge), checklists, guidance, memorandums and forms. Ensure staff is available to update the PPIM regularly with current information.
 - 3) **Staff & Parent/Families Training.**
 - a) **Staff.** Plan differentiated training for all stakeholders, e.g., principals, general/special educators, related service providers (including nurses), etc., regarding the SOPM(s) and new/modified electronic record systems. Have nurses provide training to school personnel about health resources in the community and their work.
 - b) **Parents/Families.** In collaboration with ASEAC, SEPTA, and the PRC, plan face-to-face training and on-line modules to provide parents an understanding of the information in the special education SOPM. If feasible, publish a modified document appropriate for parents and supplement it with one-page brochures to further access to this information. Ensure training is accessible to parents with diverse linguistic needs.
 - b. **Electronic IEP System.** Improve usage/effectiveness of APS's data systems through the following minor software changes:
 - 1) **Integration with SIS.** Fully integrate SIS with the IEP system (and MTSS/Section 504 systems if developed) to eliminate manual entry of duplicate information.
 - 2) **Minimize Paper Usage.** Ensure all relevant information is entered into the IEP system (and MTSS/Section 504 systems if developed) so there is little or no supplemented information on paper.
 - 3) **Expanded Text Boxes.** Allow for expanded IEP text boxes so that space is not limited arbitrarily and provide for more dropdown menus to facilitate consistent data entry and analysis.
 - 4) **IEP Form.** Expedite modification of the IEP form so that it provides: clear documentation for each special education and related service; the specific amount of time for each service; and the location in which each service is to be provided. Remove the optional nature of the "location" of services field.
 - 5) **Educational Setting.** Electronically compute and show the percentage of time a student with an IEP receives instruction in general education classes and identify the particular Federal/State educational setting the percentage reflects.
 - a) **Education Setting & Service Documentation.** Expedite modification of the IEP form so that it provides a clear documentation for each special education and related service and the specific amount of time and the location/class in which the service is to be provided.
 - b) **Educational Setting Calculation & Documentation.** Electronically calculate and show in the IEP form that is printed the overall percentage of time the student is intended to be educated in a general education classroom and the federal educational setting categories.

- c) **Percentage of Time in General Education.** Electronically compute and show the percentage of time a student receives instruction in general education classes and identify which Federal/State educational setting the percentage reflects.
- d) **Location of Service.** Make the location of service field mandatory.
- 6) **Goal Bank.** Establish an electronic bank for measurable IEP goals and allowable accommodations.
- 7) **Eligibility & Parental Non-Consent.** Enable the IEP system to show that a student was found eligible for special education services but his/her parent refused or failed to consent to initial services. In this case, the student will not receive services because the parent did not provide consent.
- 8) **Test Accommodations Access by Student Testing Coordinators.** Provide Student Testing Coordinators (STCs) permission to access the electronic IEP system to access student test accommodation information.
- 9) **IEP-at-a-Glance.** Develop a districtwide IEP-at-a-glance in the IEP system that would be generated by teachers with the click of a button.
- 10) **Health Plans & ADHD Data**
 - a) **Health Plans.** Add fields to the SIS to identify students with a health plan, the plan's date, and access to the plan for individuals with permission to do so.
 - b) **ADHD Data.** Collect and add a data field for the category of ADHD for students with OHI and for students with Section 504 plans and use the data to track prevalence rates, including racial/ethnic composition, performance, and service-related information.
- c. **Reports.** Use all relevant data stored in the IEP system to prepare user-friendly reports by school, grade level, class, program, and other categories to inform decision-making at all APS levels.

Website Analysis

- 18. **Expand access to reading information by linking all APS webpages, including those relevant for ESOL/HILT, to Instruction, Special Education and Section 504 sites.** Add to current information as new resources for reading interventions and other areas are developed through MTSS and inclusive education implementation. Include all manuals, checklists, guidance documents and forms. To the extent possible, have information available in Spanish and other high use languages.

Medicaid

- 19. **Determine potential revenue reimbursement for Medicaid billing for nursing and other related services provided by APS.** Service logging can be completed and submitted electronically, which can make the process more cost-effective while providing a higher rate of return. For nursing services specifically, work with DHS to see who would re-coup costs for nurses providing services to students.

Section 7. Accountability for Expected Practices & Results for Students with Special Needs

When school districts have clear system-wide goals and staff members are held accountable for results, there is a culture of shared responsibility for student achievement.¹²³ Throughout this report, PCG explored and commented upon the extent to which APS has established and implemented standards for practice and student achievement that pertain to the area of special education. This section discusses APS's system of accountability for expected practices and results for students with disabilities and learning challenges.

Vision, Mission & Goals

APS has an impressive mission, vision and core values of diversity, inclusivity and academic as well as social/ emotional wellness:

- **Mission.** APS instills a love of learning in its students and prepares them to be responsible and productive global citizens.
- **Vision.** APS is a diverse and inclusive school community, committed to academic excellence and integrity. We provide instruction in a caring, safe and healthy learning environment, responsive to each student, in collaboration with families and the community.
- **Core Values.** APS core values focus on the five areas of excellence, integrity, diversity, collaboration, accountability and sustainability.

Advisory Council on Instruction

According to APS's website, each school and certain community organizations have representatives on the Advisory Council on Instruction (ACI) to assist in reviewing system-wide curriculum and instructional programs to make recommendations for improvement. Appointed by the School Board, 40 to 50 individuals participate in the ACI, which has 14 curriculum-based/focused advisory committees that report to the council annually. One challenge raised was the desire by some parents to have each committee include a focus on special education and ESOL/HILT.

Strategic Plan

APS's 2011-17 Strategic Plan was developed by a 26-member Steering Committee based on: a series of forums (attended by approximately 250 community members, staff and students held over three months). The forums focused on four major areas: greatest challenges and issues facing the district; skills and abilities students must master to be successful; measures or evidence for evaluation of the district; and financial priorities.¹²⁴ A community survey (in English and Spanish) provided feedback on

¹²³ *Pieces of the Puzzle: Factors in the Improvement of Urban School Districts on the National Assessment of Educational Progress (Fall, 2011, Council of the Great City Schools (Council) 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). Available at http://www.cgcs.org/cms/lib/DC00001581/Centricity/Domain/4/Pieces%20of%20the%20Puzzle_FullReport.pdf.*

¹²⁴ These four areas are based on Robert Ewy's *Stakeholder-Driven Strategic Planning in Education*.

most important priorities for the plan; and meetings were held with more than 50 APS stakeholder groups (e.g., advisory committees, PTAs, civic associations, etc.). Two public forums and other community venues provided additional community feedback to the Strategic Plan draft. The Board adopted the [Strategic Plan document](#) on September 22, 2011, and will receive updates on APS's progress during the fall of 2012. In addition, APS has posted results related to key performance indicators (KPIs) on [APS Dashboard](#), a web-based tool for staff and the community to interact with the data and drill down for more details.

The APS Strategic Plan has five goals: challenge and engage all students; eliminate achievement gaps; recruit, retain and develop high quality staff; provide optimal learning environments; and meet the needs of the whole child. The second goal, eliminating the achievement gaps, has data for all subgroups of students (including those with disabilities) on the APS [Strategic Plan scorecard](#) and by school on the [APS Dashboard](#). In recognition of this achievement, ASEAC applauded the Strategic Plan's inclusion of objectives and measurements appropriate for students with special needs.¹²⁵ Indeed, APS has reason to be proud of the sophistication of its electronic tools and the inclusion of subgroup data, which promotes transparency and accountability. However, it is important that the APS Dashboard provides for the special needs population the same level of publicly available data available for the other student subgroups.

In various sections of this report a number of important areas were discussed that are critical factors for improving academic achievement and social/emotional growth for students with special needs. Three areas are discussed below that are relevant to the Strategic Plan.

Differentiation & Multi-tiered System of Interventions

Two of these areas are referenced in the Strategic Plan: the need for differentiated instruction; and early detection of learning gaps to provide instructional interventions.

- Regarding differentiated intervention, the Plan states, in pertinent part, under Eliminate Achievement Gaps: *"Students take part in effective and dynamic classroom instruction that is differentiated according to their particular academic needs, interests, and learning preferences."* (Emphasis added.)
- Under the second strategy for this goal, "Diagnostic and instructional activities as well as achievement growth data are aimed at early detection of learning gaps so that interventions can be prescribed to prevent gaps from increasing and to close those that exist." This strategy, along with progress monitoring to assess the extent to which learning has taken place, describes the essence of MTSS.

As discussed above, concerns were expressed that these strategies are not being used consistently in schools across the district and that expectations have not been sufficient to change this practice in spite of the strategies' research-base and likelihood that their implementation will improve achievement. Because the Scorecard and Dashboard measure the outcomes of instructional practices, it is important that other mechanisms be used to determine the extent to which the two Strategic Plan strategies referenced above are being used and to reinforce their usage. PCG's review of CLASS observations did not reveal information relevant to these strategies.

¹²⁵ April 27, 2011 ASEAC Memorandum to Arlington School Board *Non-recommending Year Report* annual report.

Instruction of Students with Disabilities in General Education Classes

A third critical research-based strategy necessary to improve outcomes for students with disabilities is the actualization of APS's vision as a diverse and *inclusive school community*, committed to academic excellence and integrity for *all* students. To do so, there needs to be a system wide service delivery system that maximizes the *effective* instruction of students with special needs in general education classes with the supplementary aids and services necessary for academic achievement and social/emotional wellness. Various focus group participants stressed that a culture shift is needed for more inclusivity, rather than "*it's not my responsibility.*" The Strategic Plan, with accompanying monitoring, lacks reference to inclusion even though it is an IDEA required performance indicator for Federal/State monitoring. APS's educational setting data do not meet state targets and reflect that students are placed in more restrictive settings than almost all comparable districts and the nation, e.g. percent of students educated in general education settings less than 40% of the time.

Programmatic Evaluations

APS's website reflects 22 evaluations that have been completed, such as this report produced by PCG. This compilation of work reflects such areas as Foreign Language, Immersion, English Language Arts, Science, etc. Concerns were expressed that these evaluations do not consistently address the special needs area as a component of the evaluation process. For example, the recently completed ESOL/HILT evaluation did not include a section pertaining to the subgroup of ELLs who also have an IEP. The inadvertent failure to conduct all evaluations in an inclusive manner for all subgroup of students reflects an overarching lack of automatic and systematic consideration of their needs in all areas of discussion.

Opportunities for Improvement

When school districts have clear systemwide goals and staff members are held accountable for results, there is a culture of shared responsibility for student achievement.¹²⁶ The following reflect relevant opportunities for improvement:

- **Inclusivity of Advisory Council on Instruction Committees.** Some parents prefer to have each of the Advisory Council on Instruction's 14 curriculum-based/focused advisory committees to include a focus on special education and ESOL/HILT.
- **Disability Subgroup Reporting.** APS's Strategic Plan includes objectives and measurements appropriate for students with disabilities. It is important that the APS Dashboard provides for the disability population the same level of publicly available data available for the other student subgroups, which promotes transparency and accountability.
- **Monitoring MTSS Practices.** Two areas referenced in the Strategic Plan are components of an MTSS framework: differentiated instruction; and early detection of learning gaps to provide instructional interventions. These strategies, however, are not used consistently in schools across the district. Expectations have not been sufficient to change this practice in spite of the strategies' research-base and likelihood that their implementation will improve achievement. Because the Strategic Plan Scorecard and APS Dashboard measure the outcomes of instructional practices, it is important that

¹²⁶ *Pieces of the Puzzle: Factors in the Improvement of Urban School Districts on the National Assessment of Educational Progress (Fall, 2011)*, Council of the Great City Schools (Council) 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). Available at http://www.cgcs.org/cms/lib/DC00001581/Centricity/Domain/4/Pieces%20of%20the%20Puzzle_FullReport.pdf.

other mechanisms be used to determine the extent to which these two Strategic Plan strategies are being used and to reinforce their usage; CLASS observations did not reveal information relevant to these strategies.

- **Inclusive Education.** APS's vision includes a diverse and *inclusive school community*, committed to academic excellence and integrity for *all* students. To actualize this vision for all students there needs to be a system wide service delivery system that maximizes the *effective* instruction of students with disabilities in general education classes with the supplementary aids and services necessary for academic achievement and social/emotional wellness. A culture shift is needed for more inclusivity, rather than "*it's not my responsibility.*" The Strategic Plan, with accompanying monitoring, lacks reference to this important factor even though it is an IDEA required performance indicator for Federal/State monitoring, and APS's outcomes miss state targets and are more restrictive than almost all comparable districts and the nation.
- **Programmatic Evaluations.** APS's programmatic evaluations do not consistently address the special needs areas as a component of the process. The inadvertent failure to conduct all evaluations in an inclusive manner for all subgroup of students reflects an overarching lack of automatic and unconscious consideration of their needs in all areas of discussion.

RECOMMENDATIONS

20. Establish a system of accountability that reflects APS's vision of high expectations for all learners and a service delivery model that is proactive rather than reactive – and inclusive in nature.

- a. Advisory Council for Instruction.** Establish a principal of universal design for every curriculum-based/focused advisory committee whereby participants are expected to address all students, including ELLs, and students engaged in MTSS, and students with Section 504 plans and IEPs. To accomplish this purpose, the various committees need access to information and individuals with knowledge about these subgroups of students and issues relevant to areas under review.
- b. APS Strategic Plan**
 - 1) Differentiated Instruction & MTSS.** To improve implementation of APS's Strategic Plan for relating to differentiated instruction and early detection of learning gaps, and its vision of a diverse and inclusive school community, supplement the Strategic Plan with consideration of the MTSS and inclusive education recommendations noted above. When standards related to MTSS and inclusive education are completed, initiate biweekly central office, cross-functional data review meetings to identify exemplary and troubling school trends. Produce and review on a regular basis a profile that shows districtwide progress towards implementation of goals. Have schools include in their school improvement plans an aggressive MTSS implementation process that is based on District expectations, using a common template. Include reporting performance data and other data relevant for MTSS (including the number of students who are on track to graduate) and expected targets for improvement, including targets for students with Section 504 Plans and IEPs.¹²⁷
 - 2) Inclusive Education Targets & Progress Monitoring.** Supplementing the Strategic Plan with appropriate outcome and other measures for inclusive instruction.
 - a) Least Restrictive Environment.** Increase the number of students with an IEP receiving instruction in general education classes at least 80% of the time with appropriate

¹²⁷ See the many resources available on the RtI Action Network website at <http://www.rtinetwork.org>.

support in their home schools, and decrease the number of students with an IEP being educated more than 60% of the time in separate classes. Establish reasonable school-based targets for this area.

- b) School Improvement Plans.** Using a common template, have schools include in their school improvement plans activities designed to move aggressively toward the provision of special education services within an inclusive school model based on district expectations and resources. Establish set protocols for the reporting progress based on expected targets and activities for improvement.

 - i.** For **cross-categorical and countywide programs**, collect and analyze data by race/ethnicity, performance over time, and disciplinary referrals to identify exemplary practices and inform the district's planning process.
 - ii.** Establish a process for reviewing each student in **private schools**, the type of services they are receiving, their cost, and what it would take for APS to provide comparable or better support within the district.
- c. Monitoring.** Ensure child find and assessment procedures are followed for students, including ELLs, who may be qualified for IAT, Section 504, and IEP services, and that the services are provided as expected. Develop a variety of strategies to monitor SOPM implementation and its impact on student learning. For example, establish responsibility for monitoring the implementation of standards for the transition of students between grade level schools to ensure appropriate services are planned and provided in a timely manner. Establish walkthrough protocols, and develop user-friendly reports to monitor student performance and implementation of standards. Use this information to modify practices, target resources, and support progress.
- d. Personnel Accountability.** Hold personnel accountable for expected results through incentives and consequences that encourage the implementation of standards for practice and fidelity. Make clear each principal's role and responsibility for *all* students in his or her school. Ensure that their evaluations include the important areas for the timely and compliant implementation and oversight of differentiated instruction, MTSS, 504 and special education standards. Establish exemplars with training for evaluating such areas as co-teaching and other supports for inclusive instruction, including areas relevant for ELLs with an IEP.
- e. Programmatic Evaluations.** Incorporate a universal design model for all future programmatic evaluations so that they address relevant issues pertinent to MTSS and students with disabilities, including ELLs. In this way, APS can set in motion a process to ensure that evaluations are inclusive of all subgroup populations and their respective needs and avoids unanticipated consequences resulting from a lack of consideration.
- f. Data.** Use valid and reliable data to regularly review patterns and trends to monitor SOPM implementation and to inform follow-up action.

 - 1) Data Clarity & Accuracy.** Identify and address concerns around data clarity and establish a central data source for all Student Services metrics. Ensure all departments know how special education data is captured and classified to avoid potential misrepresentation of data. As additional data is available for students involved with MTSS or a Section 504 plan, ensure individuals have sufficient understanding about its usage.
 - 2) Disaggregation of Data.** Disaggregate student performance and discipline data by subgroups that include students involved with MTSS, and students with Section 504 plans and IEPs.

Further sort this data by race/ethnicity, and ELL. Use this information to identify achievement gaps, modify practices, target resources, and support achievement. Develop systems for the regular disaggregation of special education student-level performance data to identify instructional gaps.

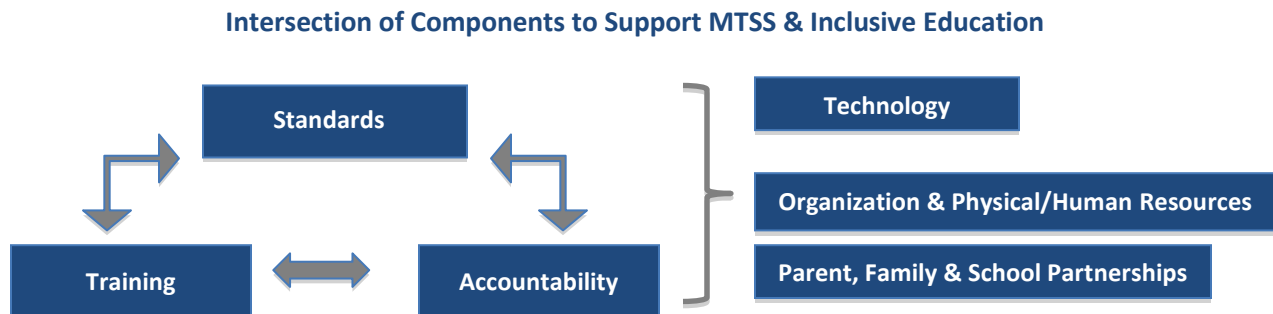
- 3) Cross-categorical & Countywide Programs.** Collect and analyze performance and suspension data over time for students in cross-categorical and countywide special education programs overall, by race/ethnicity, grade levels and schools, to identify exemplary practices, assess school improvement, and inform the district's planning process.
- 4) Case Studies.** Based on data analyses, periodically conduct case study reviews at school sites for students representative of data reflecting high-risk characteristics to inform future practices. Based on these reviews, determine if different or new standards, training, or other activities are needed.
- 5) Students with an IEP Placed in Private Schools.** Review the following for each student placed by APS in a private school to receive an appropriate education: type of services received; achievement growth; placement cost; and whether APS could provide comparable or superior instruction/services at a similar or reduced cost.

Overall Recommendations & Detailed Explanation of Six High Priority Areas

PCG's review of APS services for students with special needs included 20 recommendations that were enumerated throughout the report.¹²⁸ These have been reorganized and restructured to form 11 overall recommendations, including six that have the highest priority for implementation. The six priority areas pertain to: a multi-tiered system of supports (MTSS), inclusive education, organizational structure and collaboration, operating standards, accountability, and parent, family and school partnerships. The five remaining recommendations pertain to transition activities/services, related services, transportation, Student Support and DHS collaboration for nursing services, and Medicaid reimbursement.

Six Priority Recommendations

The recommendations below reflect the six high priority areas for implementation relating to PCG's evaluation of APS services for students with special needs. When planning implementation activities, ensure there is an alignment between standards for expected MTSS and inclusive education practices with training and accountability measures. In other words, ensure that all standards are linked to training and accountability; that all training provisions are linked to standards and accountability; and that all accountability measures are linked to standards and training. Support these components with: technology; an effective organization and physical/human resources; and parent, family and school partnerships. The schema below shows the intersection of these components.



1. Multi-Tiered System of Supports (MTSS)

Expand on the current IAT process to make it more reflective of a comprehensive and research-based MTSS framework to ensure all students receive the instruction and interventions they need to support academic and social/emotional learning, and to achieve at a higher level of performance. With leadership of the Department of Instruction and the support of Student Services and stakeholders, establish a written vision and standards for practices that provide clear, non-negotiable expectations; and develop a comprehensive phased-in implementation plan that includes preschool through secondary grade levels. Ensure that in the delivery of professional development all staff members who need training receive it and are able to demonstrate its use. Establish communication processes to inform parents about the inclusive education initiative, and to obtain implementation feedback from

¹²⁸ For the purposes of this report, students with special needs refer to students involved with MTSS, with Section 504 plans and/or Individualized Education Plans (IEPs). Students with disabilities refer to students with Section 504 plans and IEPs. Special education refers to the provision of services under the Individuals with Disabilities Education Act (IDEA) and the receipt of special education/related services through an IEP.

parents and school personnel for follow-up action.

- a. **Leadership & Engagement.** Because MTSS is based in the provision of instruction and intervention, including the foundation of a core curriculum that is implemented with fidelity, charge the Department of Instruction with responsibility for leading the development and implementation of this initiative. Have all departments with responsibility for instruction and providing related support to schools engaged in these activities and add their expertise.¹²⁹ In addition, engage other stakeholders, including those from schools, parents, and community members. Incorporate this initiative into an existing or new Board committee/council.
- b. **Standards.** With stakeholders, build on current standards to promote common language for implementing MTSS and for professional development to include the following:¹³⁰
 - a) **Universal screening and progress-monitoring tools** appropriate for elementary, middle, and high schools, and use of benchmark data to identify students for the MTSS process in all schools, incorporating elements relevant for ESOL/HILT students.
 - b) **Core curriculum expectations** and use of [universal design for learning](#) (UDL).¹³¹
 - c) Three levels of **increasingly intensive research-based interventions**, including reading, math and behavior that are culturally and linguistically appropriate, and that are available short and long term.
 - d) **Interventions that are research-based**, specific enough to **monitor for fidelity** at multiple grade levels, and appropriate for differing content levels.
 - e) **Progress monitoring**, including the calculation of targets for student progress when provided with appropriate research-based interventions, and on initiating a referral for special education services when sufficient progress is not made after providing the appropriate interventions.
 - f) **Scheduling**, including best practice models for facilitating use of the broadest range of intervention providers.
 - g) **Standardized forms** and other documentation.
 - h) **Professional development**, including expectations for providing and requiring staff participation.
 - i) **Active student involvement** in the IAT process, including progress monitoring and planning.
 - j) **Electronic communication tools** and other methods for collaborating with parents/families and providing them access to information.
 - k) **MTSS interface with referral** for special education and Section 504 evaluations.
- c. **Data.** Regularly collect, analyze, report, and follow up on student academic/behavior-related data. Show the connection between this data and its use to show student academic progress and evidence of personnel performance. Disaggregate student-level data by special need areas,

¹²⁹ It is expected that Student Services representatives would have a major role in this process given their knowledge and skills.

¹³⁰ See the Virginia Department of Education's Responsive to Intervention website at http://www.doe.virginia.gov/instruction/response_intervention/index.shtml - and the Council of the Great City Schools' [Common Core State Standards and Diverse Students: Using Multi-Tiered Systems of Support](#) and the websites referenced at the end of the document at <http://www.cgcs.org/domain/87>.

¹³¹ Through a Universal Design for Learning (UDL) approach, curriculum is initially designed with the needs of all students in mind, so that methods, materials, and assessment are usable by all. See National Center on Universal Design for Learning at www.udlcenter.org/.

race/ethnicity, ELL, economic disadvantage, school, school grade levels, as feasible and appropriate, to inform decision-making for the following issues:

- 1) **Representation of students** in various special needs and disability areas to identify over/underrepresentation and establish follow-up activities.
 - 2) **Performance data** to identify instructional gaps. Benchmark progress of students with an IEP against their general education peers.
 - 3) **Attendance** to identify students and schools with high absence rates to ensure that schools are taking expected steps to increase their attendance.
- d. **Districtwide Implementation Plan.** Develop a phased-in three to five year implementation plan. Address needs for dual identified (ELLs with an IEP), students with disabilities, students who are gifted and twice exceptional students (gifted students with an IEP); identify staff accountable; establish roles and responsibilities; provide for differentiated professional development and parent training; establish demonstrable outcomes; and include the following components:
- 1) **Research-based Interventions.** Based on a menu of research-based multi-tiered interventions for reading, math and social/emotional learning, establish a two to three year timeline for each school to have access to sufficient resources and training for their students.
 - 2) **Districtwide & School-based Teams.** Have districtwide and school-based teams facilitate implementation based on parameters set by the Leadership Team and standards. See *New Teacher Teams Support Integrated Comprehensive Services*.¹³²
 - 3) **Fiscal.** Determine the fiscal implications of enabling schools to retain special educators as “interventionists” to provide support for all students if the need for these teachers is reduced because there are fewer students who need special education services.
 - 4) **Time Frame.** Establish an aggressive but reasonable overall time frame, e.g., five years, for implementation and individualize transition of students back to their home schools, ensuring that appropriate supports and services are in place.
- e. **Professional Development.** As part of the professional development program referenced in the Districtwide Implementation Plan, incorporate the following:
- 1) **Professional Learning Standards.** Professional development based on national professional learning standards, such as Learning Forward’s Standards for Professional Learning.¹³³
 - 2) **Core Content & Reading Instruction.** Plan for how special educators will become more knowledgeable about core curricular content and reading instruction to become both highly qualified and effective teachers. Include, as appropriate, general educators and ESOL/HILT teachers.
 - 3) **Dual Identified/Twice Exceptional Students.** Information relevant to ELLs, including Sheltered English Instruction Protocol (SIOP) training and reinforcement. For ELLs, reinforce use of the Sheltered English Instruction Protocol (SIOP).
 - 4) **Engage Stakeholders.** Inclusion of the following/other relevant groups when planning learning opportunities: principals; general, special and gifted educators; special education assistants;

¹³² <https://www.dropbox.com/s/7hpo5vlpnviqtc/%20New%20Teacher%20Teams%20to%20Support%20Integrated%20Comprehensive%20Services.pdf>

¹³³ <http://www.learningforward.org/standards#.UMvVD7Yt0kU>

ESOL/HILT teachers; clinicians; administrators; and parents. Differentiate instruction for varying knowledge/skills and ensure that sessions clearly identify and address the knowledge/needs of the intended audience.

5) Access to Training. Utilize a broad range of training models, such as the following:

- a) Multiple formats** (e.g., videos, webinars, narrative text, distance learning) and presentation models (e.g., school-based, small groups, etc.) that are differentiated, based on current levels of staff knowledge and skills.
- b) APS's website** to present access to training materials for various stakeholders.
- c) Cross-functional teams** with individuals who directly support schools in order to provide primary training to the broadest spectrum of administrative and instructional staff, so they can help provide direct support, mentoring, coaching, and technical assistance to principals and teachers.
- d) Cross-school opportunities** to discuss inclusive instructional challenges and issues, to emphasize consistency across APS schools, and to visit exemplary MTSS practices. (Note: identify exemplary schools for this purpose.)
- e) Trainers** who are staff members and others having the experience and knowledge to be part of a professional development faculty.
- f) Modified walk-through protocols** to include the standards, monitor the extent to which school practices conform to the guidance, and initiate technical assistance, professional development, coaching, and mentoring as necessary to improve practices.
- g) Certification.** Ensure that in the delivery of professional development all staff members who need training receive it and are able to demonstrate its use. Mandate components of essential training and provide a certificate of demonstrated performance.

f. Communication & Feedback

- 1) Internal.** Establish a timely communication and feedback process to share solutions to MTSS implementation barriers. Several problem areas are likely to require a targeted group of knowledgeable people to resolve implementation 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) Parent/Families.** With input from parent groups, develop electronic and written materials and other modes of communication to explain MTSS to families, its progress, and how parents can have input in and be involved with the process.
- g. CLASS Observation Protocol.** Review the CLASS observation protocol to ensure that it includes sufficient indicators relevant to differentiated instruction and MTSS implementation and that observers have the knowledge and training necessary to assess these areas. Consider adding more fields to the observation data collection system, e.g., tier(s) and type of intervention, to support more detailed analysis.
- h. Electronic Record Systems.** Develop an electronic record system with user-friendly reports to support MTSS implementation in a manner that is similar to APS's electronic IEP system. Use all relevant data stored in these systems to prepare reports by school, grade level, class, program, and other categories to inform decision-making at all APS levels.

- i. **Use of Federal/State Funds.** Investigate availability of state funds; and how funds 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, i.e., Response to Intervention (RtI), in public schools.¹³⁴

2. Inclusive Education

Actualize APS's vision as a diverse and *inclusive school community*, committed to academic excellence and integrity, by maximizing inclusive and effective instruction, intervention and support for all students, including those with special and dual needs. These students include those who are ELLs and/or receive support through MTSS, a Section 504 plan, and/or an IEP. Lay a foundation for this work by expanding the district's courageous conversations involving race and ethnicity to include students with disabilities. With leadership of the Department of Instruction and the support of Student Services and stakeholders, establish a written vision and standards for practices that provide clear, non-negotiable expectations; and develop a comprehensive implementation plan that includes preschool through secondary grade levels. Ensure that in the delivery of professional development all staff members who need training receive it and are able to demonstrate its use.

- a. **Courageous Conversations.** Engage in courageous conversations with stakeholders and school board members about the district's current configuration of services for students with disabilities, their performance over time, and the district's fortitude to embark on a journey to provide services in a more inclusive manner and become known as a leader in the state and nation for improved outcomes for students with special needs.
- b. **Leadership & Stakeholders.** Because of the nature of the paradigm shift necessary to achieve success, which includes the active involvement of general education, it is important that the initiative be viewed as an "educational" initiative rather than a "special education" initiative. Have a senior staff member in the Department of Instruction lead an implementation team, including representation from Student Services, ESOL/HILT, principals to guide the implementation process. Engage the support of ASEAC, SEPTA and university partners and their resources. Establish specific stakeholder groups as needed to consider such areas as preschool and other grade level inclusive practices, high school course offerings, etc.
- c. **Standards.**¹³⁵ Establish a written vision and standards for inclusive education practices that provide clear, non-negotiable expectations in areas that include:
 - 1) **Responsibility of school principal and personnel for all students** in the school, including students in countywide programs. (Change the name of "countywide programs" to maximize the effective inclusion of students with disabilities in all aspects of the school's academic and nonacademic programs and extracurricular activities to one that would not imply that the programs are not an integral part of each school in which they are located, e.g., specialized or clustered programs.)
 - 2) **Support for the most integrated, cohesive, and comprehensive services** for students with disabilities in the schools and classrooms they would attend if they did not have a disability and

¹³⁴ 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 <http://www2.ed.gov/programs/titleiparta/rti.html>.

¹³⁵ The use of the term "standards" is not intended to refer to a "cookie-cutter" practice approach. Rather, it refers to core elements that research has shown are more likely *than not to lead to success* if implemented with fidelity. It is expected that these practices would be implemented in a manner that takes into account local school factors and uniqueness.

the use of a **universal design for learning** to maximize access to core instruction in the classroom level, including the use of **assistive technology** and **differentiated instruction** at all grade levels. Establish an expectation that textbooks for general education classes/teachers will be ordered and provided for any special program classes/teachers as well.

- 3) **Use of MTSS** (as it is developed with effective academic and social/emotional interventions, progress monitoring, problem-solving, goals intended to close achievement gaps, etc.) for students with an IEP. Ensure standards include use of **reading and other interventions** effective for the use of students with an IEP and dually identified students.
- 4) **Culturally responsive and linguistically appropriate** instruction, including a revised ESOL/HILT checklist that is user-friendly, research-based and field-tested with school-based personnel.
- 5) **Progress Monitoring**. Establish standards for monitoring student performance, including the frequency of monitoring and its documentation to reflect teaching effectiveness and learning growth. Establish standards developed for the MTSS process so that these standards provide for at least if not more frequent monitoring and comprehensive documentation for students with an IEP.
- 6) Research-based **co-teaching** methodology for all grade levels, including early childhood.¹³⁶
- 7) Research-based practices for including **students with severe disabilities**. See *Students with Severe Disabilities and Best Practice*.¹³⁷
- 8) Research-based standards for the functional life skills and other **special programs**, including students' access to the core curriculum.
- 9) **Flexible grouping** for instruction/services that are not dependent on a student's "program" or disability area, e.g., access to social skills instruction.
- 10) **Scheduled common planning time** for general/special educators and professionals to have structured opportunities to share information about students. Have special educators assist general educators to understand how to best provide targeted and appropriate supports based on student needs.
- 11) **Creative use of scheduling** to ensure needed flexibility for true co-teaching to occur.
- 12) **Master schedule** by which students with special needs and those receiving ESOL/HILT services are to be scheduled first to ensure individual needs are better met.
- 13) **Access to rigorous secondary school required & elective courses**, including the use of co-teaching and supplementary aids/services. Communicate with parents/ students the availability of such supports for students. Expect staff to encourage students to enroll in these courses.
- 14) **Active student involvement** in the IEP process, including student-led IEP meetings, progress monitoring and planning (Transition planning for students with an IEP begins in grade 8 or at age 14, whichever comes first.)

¹³⁶ For co-teaching resources, see Dr. Marilyn Friend's *Co-Teaching Connection* website at <http://www.marilynfriend.com/index.htm>, and the National Dissemination Center for Children with Disabilities' website, *Co-Teaching: General and Special Educators Working Together* at <http://nichcy.org/schoolage/effective-practices/coteaching>.

¹³⁷ <https://www.dropbox.com/s/5aee10stykr8o4b/Students%20with%20Severe%20Disabilities%20%26%20Best%20Practice.pdf>

- 15) **Parent/School Communication System** to enable parents and teachers to share information easily.
- d. **Districtwide Implementation Plan.** Develop an implementation plan, building on components for MTSS. Address needs for ELLs, students with disabilities, and students who are twice exceptional (gifted students with an IEP); identify staff accountable; establish roles and responsibilities; provide for differentiated professional development and parent training; establish demonstrable outcomes; and include the following components:
 - 1) **Research-based Interventions.** Based on a menu of research-based multi-tiered interventions for reading, math and social/emotional learning (including those for preschoolers, and ELLs), establish a two to three year timeline for each school to have access to sufficient resources and training for their students.
 - 2) **Effective Models.** Establish various effective scheduling models for co-teaching and planned collaboration.
 - 3) **Tie the planning process to MTSS** (academic and social/emotional) to minimize fragmentation, enhance cohesiveness and reinforce the framework as applying to improved outcomes for all students.
 - 4) **Districtwide & School-based Teams.** Have districtwide and school-based teams facilitate implementation based on parameters set by the Leadership Team and standards. See *New Teacher Teams Support Integrated Comprehensive Services*.¹³⁸
 - 5) **Time Frame.** Establish an aggressive but reasonable overall time frame, e.g., five years, for implementation and individualize transition of students back to their home schools, ensuring that appropriate supports and services are in place.
 - e. **Professional Development.** As part of the professional development program referenced in the Districtwide Implementation Plan, incorporate the following:
 - 1) **Professional Learning Standards.** Professional development based on national professional learning standards, such as Learning Forward's Standards for Professional Learning.¹³⁹
 - 2) **Core Content & Reading Instruction.** Plan for how special educators will become more knowledgeable about core curricular content and reading instruction to become both highly qualified and effective teachers. Include ESOL/HILT teachers, and general educators as needed.
 - 3) **Knowledge Required for Inclusive Instruction.** With knowledgeable representatives of general/special educators identify knowledge, skills, and expertise necessary to teach effectively in inclusive settings. Also, ensure training is aligned with core curricular standards for all students and that instruction is not based on a "special education curriculum with its own scope and sequence." Through a survey or other method, identify gaps in content core curricular knowledge of special educators, especially at the secondary school level, and aggressively develop courses and/or other methods for personnel to obtain this information.
 - 4) **Dual Identified Students.** Information relevant to ELLs, including Sheltered English Instruction Protocol (SIOP) training and reinforcement. For ELLs, reinforce use of the Sheltered English Instruction Protocol (SIOP).

¹³⁸ <https://www.dropbox.com/s/7hpo5vixpniqtq/%20New%20Teacher%20Teams%20to%20Support%20Integrated%20Comprehensive%20Services.pdf>

¹³⁹ <http://www.learningforward.org/standards#.UMvVD7Yt0kU>

- 5) **Engage Stakeholders.** Inclusion of the following/other relevant groups when planning learning opportunities: principals; general, special and gifted educators; special education assistants; ESOL/HILT teachers; clinicians; administrators; and parents. Differentiate instruction for varying knowledge/skills and ensure that sessions clearly identify and address the knowledge/needs of the intended audience.
- 6) **Paraprofessionals.** Incorporate relevant training for paraprofessionals.
- 7) **Access to Training.** Utilize a broad range of training/technical assistance models, such as the following:
 - a) **Multiple formats** (e.g., videos, webinars, narrative text, distance learning) and presentation models (e.g., school-based, small groups, etc.) that are differentiated, based on current levels of staff knowledge and skills.
 - b) **APS's website** to present access to training materials for various stakeholders.
 - c) **Cross-functional teams** with individuals who directly support schools in order to provide primary training to the broadest spectrum of administrative and instructional staff, so they can help provide direct support, mentoring, coaching, and technical assistance to principals and teachers.
 - d) **Cross-school opportunities** for discussion to identify exemplary inclusive education practices and personnel to be able to become professional developers, and arrange visits to observe model inclusive education practices.
 - e) **Trainers** who are staff members and others having the experience and knowledge to be part of a professional development faculty.
 - f) **Modified walk-through protocols** to include the standards, monitor the extent to which school practices conform to the guidance, and initiate technical assistance, professional development, coaching, and mentoring as necessary to improve practices.
- f. **Paraprofessional Support.** Implement activities to support paraprofessionals and enable them to maximize their assistance to students and teachers. Develop models to enhance communication both among paraprofessionals, and between paraprofessionals and assigned teachers to bolster their effectiveness in the classroom, and enhance their professional learning. As part of this process incorporate the following activities.
 - 1) **Professional Learning.** Create a more robust and paraprofessional-centric professional learning program that includes, but is not limited to: inclusion and differentiation; training in best practices for working with students on the autism spectrum; training in positive interventions and social skills; training in continuum of services and inclusive classroom work; training in crisis intervention and bullying; knowledge of assistive technology resources and usage; knowledge of Spanish, math, and reading techniques; understanding of an IEP, accommodations and goals, and progress monitoring. Explore relationships with local colleges and universities to create college study opportunities that would provide paraprofessionals with skills and knowledge to supplement APS training. A degree program with potential full-time teaching in APS may be a goal of this collaboration.
 - 2) **Family Communication.** Provide opportunities for paraprofessionals to assist their assigned teacher with family communication.
 - 3) **Access to IEPs.** Ensure access to assigned students' IEPs.

- 4) **Monthly Meetings.** Schedule monthly meetings for paraprofessionals within specific groups as well as schedule system-wide meetings through which paraprofessionals can network, share best practices and resources, and listen to invited guest speakers.
 - 5) **Planning Time.** Schedule planning time with the paraprofessional and assigned special and regular education teachers.
 - 6) **Collaboration.** Support models for teachers and paraprofessionals to share knowledge and problem-solve, e.g., using a website with links to an online chat room, professional development topics and dates, and other relevant resources.
 - 7) **APS High School Course Offerings.** Review APS's course offerings and access for students with disabilities, including ELLs, and consider the expansion of non-traditional course offerings, and creative strategies to enable more students with disabilities to access and be successful in rigorous courses.
- g. Assistive Technology.** Track assistive technology referrals to ensure there are timely assessments and follow-up. Conduct an assistive technology survey to determine the extent to which students who need services have them and are using them as intended. Collaborate with Instructional Technology to determine whether it is economically feasible to provide schools with a set of the most frequent assistive technology devices, including those relevant for students with Section 504 and involved with the MTSS process. This approach was used by the Scottsdale Public Schools (AZ) and received positive feedback for its effectiveness and positive outcomes.
- h. CLASS Protocol & Data.** Review the CLASS observation protocol and revise it to ensure that it includes sufficient indicators relevant to differentiated instruction, MTSS implementation and inclusive education standards, and that observers have the knowledge and training necessary to assess these areas. Add to the CLASS protocol areas to address: access to the core curriculum; differentiated instruction; accommodations and modifications; use of effective interventions for reading and math; use of data; monitoring student progress; and co-teaching. Also, add to the observational data collection fields for student disability and program type to support more detailed analysis. Ensure that all observers have expertise in the area of special education, MTSS and 504 and have reviewed student IEPs, IATs or 504s.
- i. Communication**
- 1) **Internal.** Establish a timely communication and feedback process to share solutions to inclusive education implementation barriers. Several problem areas are likely to require a targeted group of knowledgeable people to resolve implementation issues as they arise.
 - 2) **Parents/Families.** With input from the Arlington Special Education Advisory Committee (ASEAC), the Parent Resource Center (PRC) and other relevant parent groups, develop electronic and written materials and other modes of communication to explain inclusive education to families, its progress, and how parents can have input in and be involved with the process. Ensure that this information is accessible to parents who have limited English proficiency or have difficulty reading.

3. Organization & Collaboration

Maximize collaboration between personnel in the Department of Instruction and Student Services, and within Student Services, to facilitate the coordination of all APS resources to support teaching and learning.

- a. Instruction & Student Services.** The recommendations for the implementation of an MTSS framework and for inclusive education instruction and support, which are culturally and linguistic appropriate, requires collaborative teamwork by Instruction and Student Services personnel. Have the Assistant Superintendent for Instruction and the Assistant Superintendent for Student Services establish a communication and management protocol designed to carry out the recommendations referenced in this report.
- 1) MTSS.** Have the Assistant Superintendent for Instruction provide the leadership for MTSS. MTSS is an inclusive initiative and incorporates students with disabilities and ELLs. Having Instruction lead the effort visibly communicates that the framework is based in general education, is designed to improve teaching and learning, and is not designed as a path to special education eligibility.
 - 2) Inclusive Education.** Have Student Services and relevant Instruction personnel support the effort. Although Student Services will likely provide the bulk of support needed to formulate planning and support for inclusive education, the leadership of Instruction is necessary to communicate that this model relies on general educators to differentiate instruction and collaborate with their special education/related services peers.
 - 3) Protocol.** Execute a protocol that establishes expectations for how personnel from Instruction and Student Services will communicate and share information, develop materials, cross-train their personnel, provide technical assistance and professional development, link information on their websites, monitor and take follow-up action, etc. In addition, include an expectation for consistent and collaborative systemic planning between the Special Education and ESOL/HILT offices to develop/monitor the implementation of standards for ELL/special needs identification, service delivery and related professional learning development activities.
 - 4) Planning.** Develop/execute plans to improve academic achievement and positive behavior outcomes through strategies including but not limited to support for: instruction and professional learning; district and school-based teams that review student data and activities designed for improvement; and principals and staff members.
 - 5) Websites.** Expand access to reading information by linking all APS webpages, including those relevant for ESOL/HILT, to Instruction, Special Education and Section 504 sites. Add to current information as new resources for reading interventions and other areas are developed through MTSS and inclusive education implementation. Include all manuals, checklists, guidance documents and forms. To the extent possible, have information available in Spanish and other high use languages. Put the Bridge Manual on APS's website and link it to all relevant departmental webpages.
- b. Student Services.** Implement organizational changes to Student Services to provide a more reasonable supervisory scope of responsibility and more focused support for schools to achieve the outcomes desired for inclusive schools. These recommendations are provided to trigger a lively discussion about ways in which the organization may improve its support of schools to enhance educational outcomes for students with disabilities. It is anticipated that representatives from the Department of Instruction, schools and parents will participate to discuss needs, goals and the best way to meet them. After the revised organization is established, produce an organizational chart that includes all personnel in the organization, including administrative assistants, clericals, etc., and numbers in each organizational group, to facilitate a better understanding of the Department's structure. Produce a communication flow chart for whom to call for specified purposes. Distribute the information broadly to central office/school personnel, parents, and the community; and

establish a link to the information on the APS website.

1) Special Education Services

a) **School Liaisons.**¹⁴⁰ Assign an appropriate number of personnel to serve as liaisons between the Department of Student Services and the schools they support to have timely and sufficiently frequent consultations with principals/designees about their service delivery model, planning for improved instruction, oversight of special education, and be a resource for matters requiring a high level of expertise. Have the liaisons be the primary contact for all of each school's special education and Section 504 issues. Consult with a representative group of principals, key instruction administrative personnel who understand school operations, and the budget office to determine the amount of time each school requires for sufficient support and the overall number of liaisons required. The primary work of the school liaisons would be to focus on teaching and learning and support for inclusive instruction. For this process to work effectively, the liaisons' role should not include attendance at all routine eligibility and other special education meetings; instead, limit involvement to eligibility and other meetings that are particularly difficult and require a higher level of expertise otherwise available at the school.

b) **Research-based Content Specialists.**¹⁴¹ Have a group of individuals who continuously research and share information, provide back-up support for liaisons, and oversee professional development activities for critical areas, such as:

- Pre-K education;
- Identifying, assessing and instructional strategies/interventions for ELLs with disabilities;
- Intensive interventions for academic, social, emotional and/or communication needs;
- Differentiated instruction, co-teaching and other inclusive education supports;
- Curriculum and instruction aligned with alternate assessment standards;
- Assistive technology;
- Low vision/blind and low hearing/deaf support;
- Postsecondary transition activities and support; etc.

Ensure that this group is able to provide support to the school liaisons (and school staff when necessary) and support vertically and horizontally consistent standards-based practices. Have these content specialists communicate research-based interventions that are not based on a student's disability category or specialized program but on a constellation of learning characteristics, strengths and needs that students bring. Such an approach will enable research-based instructional strategies to reach all students with relevant characteristics – not just those with a specific disability label. As these content specialists share their knowledge with school liaisons, the liaisons will be better able to address more school-based issues and any special program issues in their assigned schools directly.

c) **Operations.** Have the above groups of personnel share their operational responsibilities using estimates about the time necessary to perform these operational duties and other

¹⁴⁰ The term "school liaison" is used as a generic term only for purposes of describing this personnel area.

¹⁴¹ The term "research-based content specialist" is used also as a generic term only for purposes of describing this personnel area.

responsibilities to determine the full-time equivalent staff required and their respective roles.

2) Pupil Services

- a) **Related Services Personnel.** Group support for all personnel who provide direct services to students under Pupil Services, i.e., counselors, psychologists, social workers, substance abuse and attendance specialists, and homeless.
 - i. **Personnel to Student Ratios.** Ensure the use of appropriate ratios for related services personnel to student and the equitable allocation of personnel to schools.
 - ii. **Professional Development & Materials.** Ensure related services personnel are included in all professional development activities and have access to appropriate and up-to-date materials.
 - iii. **Personnel Evaluations.** Have principals evaluate related service providers who support students at their schools, and have Pupil Services administrators coordinate the results and resolve differences of opinion between principals and with Pupil Services. There is a relatively small number of Pupil Services supervisory personnel available to evaluate related services providers and observe each at his/her assigned schools. For this recommendation to be implemented effectively, provide principals with sufficient training to conduct the evaluations and have Pupil Services supervisors address any specific aspects of the evaluation process that requires their expertise. In addition, have Pupil Services supervisors provide additional support to principals on a case-by-case basis, e.g., the principal is unsure about a provider's abilities and/or performance.
- b) **Program Support.** Group individuals responsible for hearing/vision screening, attendance, homeless, home instruction, medical and psychological transfers and student records.
- c. **Procedural Support & Compliance.** Have a group of individuals who support the Assistant Superintendent of Student Services with expertise in Section 504, IDEA, and related requirements. Enable this group to have access to data to identify compliance trends and patterns of concern. With the support of others, have this group be responsible for drafting written guidance to promote common language and practices; support professional development; and coordinate compliance activities.
- d. **Supervision of Various Groups.** Based on the results of these groupings, work with Human Resources and Budget to determine the scope of supervisory and other responsibilities to determine position titles and the number of administrative positions required to perform expected responsibilities.
- e. **Implementation Plan.** To facilitate a well-managed and orderly transition, develop and execute a comprehensive implementation plan, including the following components.
 - 1) **Central Office.** Include sufficient initial and ongoing training to ensure personnel have the knowledge they need to carry out their responsibilities. Develop a process for obtaining feedback to identify any issues that may arise and to provide additional support when needed. Include consideration of how Student Services personnel will be integrated into Instruction activities and strategic planning.
 - 2) **Schools.** To enable schools to facilitate most Section 504, special education eligibility and other meetings and take on the LEA representative role, incorporate in the plan important considerations from school and parent stakeholders.

- 3) **Written Guidance.** Ensure that there is written guidance, e.g., comprehensive Student Services manual, that promotes a common language and understanding of standards and expectations.
 - 4) **Professional Learning.** Include in the plan a comprehensive professional learning component to explain the basis for changes at the central office and school levels and enables all personnel to carry out their roles and responsibilities.
 - 5) **Time Frame.** The time frame for implementation should be aggressive but provide sufficient time for preparation.
- f. **Staff Ratios.** Review the ratios for related services personnel and the process for determining student need for these services. As part of this review, include an analysis of caseload and workload, and related state requirements. Ensure there are clear and objective standards in place as well as a process for oversight and accountability for results. Include these standards in the APS Student Services manual.
- g. **DHS & Student Services Communication.** Facilitate better communication between DHS and Student Services for nursing services by hosting monthly meetings. Review and address communication and any other issues to minimize coordination problems relating to the dual agency interaction. Work toward a plan to incorporate nurses and nursing staff in the classroom when able to support health education activities.

4. Operating Procedures

Produce electronic standard operating procedure manuals (SOPM) to post policies, procedures and expected practices for MTSS, Section 504, special education/related services, and requirements for ELLs with disabilities, with links to additional information and resources. Post the SOPMs on various pages of APS's website to maximize accessibility.

- a. **Section 504 Manual.** Expedite the review and revision of all documents necessary to implement APS's Section 504 Procedural Manual revised Section 504 and take additional steps to maximize their operation.
- 1) **Training.** Continue training for current and future principals and other relevant school-based personnel, ensuring that it addresses areas of concern listed in the PCG report and that it is meaningful to participants. Additionally, enhance outreach to parents to provide them information regarding the Section 504 revised standards and their implementation, and to encourage them to visit the Parent Resource Center.
 - 2) **Progress Monitoring.** Ensure that student progress data is collected and shared effectively and regularly with parents and with students on a regular basis.
 - 3) **Implementation.** Ensure that APS's revised Section 504 standards are implemented appropriately for all students. Track Section 504 eligibility rates and determine whether the rates for ELLs become more proportionate to ELL student enrollment. Take steps to ensure that the supplementary aids and services listed in Section 504 plans are implemented consistently and that staff members have time to collaborate as needed to coordinate and share information about student needs and progress.¹⁴² Finally, take steps to ensure that students, especially those

¹⁴² The recommendation regarding collaboration for Section 504 services applies also for students receiving MTSS interventions and/or students with IEPs.

at the high school level, are engaged as appropriate in the development and implementation of their Section 504 plan.

- 4) **Electronic Section 504 Record System.** If economically feasible, develop an on-line system to support the Section 504 process, which would be similar to but not as complex as the electronic IEP system.
 - 5) **Section 504 Webpage.** Provide a link to the Office for Civil Rights, U.S. Department of Education's website.
- b. **Online Special Education SOM.** Develop a comprehensive special education SOPM that establish all requirements necessary for the operation of special education and implementation of IEP-required services. Provide links to in depth information and resources, including other relevant manuals (e.g., Bridge), checklists, guidance, memorandums and forms. Ensure staff is available to update the PPIM regularly with current information. Include the areas described below.
- 1) **Contents.** In the order that the special education process occurs, i.e., referral, evaluation, eligibility, development of IEP, etc., address the issues highlighted in this report:
 - a) **Eligibility.** Establish local operational criteria for determining a student's disability in areas reflecting over and under representation to ensure criteria provides sufficient guidance for decision-making. Revise eligibility forms to reflect these criteria to document whether assessment data and information show that a student meets all criteria for the disability under consideration. For students who are ELL, include sections that would support the documentation of information relevant to a student's language usage and its relationship to the disability criteria.
 - b) **Consent.** When a parent does not consent to a child's receipt of initial special education services, the record should indicate that the student is eligible for services but that the parent refused to consent. Consider whether this is an issue that must be addressed in the electronic IEP system.
 - c) **IEP Requirements.** Establish clear standards for the documentation of meaningful present levels of performance, consideration of student strengths and student academic/developmental/functional needs; and for how this information is aligned with measurable annual goals/objectives or benchmarks. Explain the relationship between the resource/self-contained nomenclature based on the 15-hour per week distinction, and Federal/State educational setting percentages of time students are educated in general education classrooms.
 - d) **Educational Setting.** Provide a thorough description of Federal/State requirements relating to the provision of special education/related services in the least restrictive environment and research-based practices designed to promote inclusive education. Provide a clear explanation of Federal/State educational setting criteria and the calculation for determining the percentage of time a student is educated in the general education setting.
 - e) **Co-Teaching.** Establish an expectation that co-teaching parameters be included in an IEP when the team intends for a student to receive services through this service configuration.
 - f) **Related Services.** Specify clear and objective standards for the provision of related services for students with disabilities to benefit from their education.
 - g) **Test Accommodations.** Clarify that accommodations are not "subject" specific but are related to the content being accommodated. Describe how to document a student's

accommodations so that school test coordinators can easily find and interpret them.

- h) Progress Monitoring.** Establish standards for monitoring student performance, including the frequency of monitoring and its documentation to reflect teaching effectiveness and learning growth. Establish standards developed for the MTSS process so that these standards provide for at least if not more frequent monitoring and comprehensive documentation for students with an IEP.
- j. Issues Pertaining to Students with IEPs or Section 504 Plans**

 - i. Nurse Participation in Meetings.** Establish standards for the participation of nurses in MTSS, Section 504 and IEP meetings for students with health issues to ensure issues are fully discussed and understood and to maximize informed communication between school teams and parents about health matters.
 - ii. Transportation.** Develop standards for specialized transportation, including the reasonable amount of time required to establish new routes for students with disabilities.
 - k. Issue Pertaining to Students with Special Needs.** Establish standards for encouraging parents to attend MTSS, Section 504 and IEP meetings and facilitating meaningful participation, especially for parents who are limited English proficient.
- 2) SOPM Links & Updates.** Provide links to in-depth information and resources, including other relevant manuals (e.g., Bridge), checklists, guidance, memorandums and forms, e.g., in the Section 504 Manual address language considerations for ELLs and reference the Bridge Manual; and in the Bridge Manual reference APS's Section 504 Procedural Manual. Ensure staff is available to update SOPMs regularly with current information.
- 3) Staff & Parent/Families Training.**

 - a) Staff.** Plan differentiated training for all stakeholders, e.g., principals, general/special educators, related service providers (including nurses), etc., regarding the SOM(s) and new/modified electronic record systems. Have nurses provide training to school personnel about health resources in the community and their work.
 - b) Parents/Families.** In collaboration with ASEAC, SEPTA, and the PRC, plan face-to-face training and on-line modules to provide parents an understanding of the information in the special education SOPM. If feasible, publish a modified document appropriate for parents and supplement it with one-page brochures to further access to this information. Ensure training is accessible to parents with diverse linguistic needs.
- c. ELLs with Special Needs.** In all SOPMs involving students with special needs, ensure that information is culturally and linguistically appropriate, and incorporate the following provisions:

 - a) ESOL/HILT Checklist.** With knowledgeable stakeholders, revise the ESOL/HILT checklist so it is user-friendly, research-based and field-tested with school-based personnel and ESL/special education services to dual-identified students.
 - b) Bridge Team.** Establish an expectation that each school is to have a Bridge Team that functions as described in the Bridge Manual; and that principals provide the support needed.
 - c) Training.** Communicate the changes using influential school-based personnel who can explain how the new process will improve outcomes for ELLs.

- d. **Electronic IEP System.** Improve usage/effectiveness of APS's data systems through the following minor software changes:
- 1) **Integration with SIS.** Fully integrate SIS with the IEP system (and MTSS/Section504 systems if developed) to eliminate manual entry of duplicate information.
 - 2) **Minimize Paper Usage.** Ensure all relevant information is entered into the IEP system (and MTSS/Section504 systems if developed) so there is little or no supplemented information on paper.
 - 3) **Expanded Text Boxes.** Allow for expanded IEP text boxes so that space is not limited arbitrarily and provide for more dropdown menus to facilitate consistent data entry and analysis.
 - 4) **IEP Form.** Expedite modification of the IEP form so that it provides: clear documentation for each special education and related service; the specific amount of time for each service; and the location in which each service is to be provided. Remove the optional nature of the "location" of services field.
 - 5) **Educational Setting.** Electronically compute and show the percentage of time a student with an IEP receives instruction in general education classes and identify the particular Federal/State educational setting the percentage reflects.
 - a) **Education Setting & Service Documentation.** Expedite modification of the IEP form so that it provides a clear documentation for each special education and related service and the specific amount of time and the location/class in which the service is to be provided.
 - b) **Educational Setting Calculation & Documentation.** Electronically calculate and show in the IEP form that is printed the overall percentage of time the student is intended to be educated in a general education classroom and the federal educational setting categories.
 - c) **Percentage of Time in General Education.** Electronically compute and show the percentage of time a student receives instruction in general education classes and identify which Federal/State educational setting the percentage reflects.
 - d) **Location of Service.** Make the location of service field mandatory.
 - 6) **Goal Bank.** Establish an electronic bank for measurable IEP goals and allowable accommodations.
 - 7) **Eligibility & Parental Non-Consent.** Enable the IEP system to show that a student was found eligible for special education services but his/her parent refused or failed to consent to initial services. In this case, the student will not receive services because the parent did not provide consent.
 - 8) **Test Accommodations Access by Student Testing Coordinators.** Provide Student Testing Coordinators (STCs) permission to access the electronic IEP system to access student test accommodation information.
 - 9) **IEP-at-a-Glance.** Develop a districtwide IEP-at-a-glance in the IEP system that would be generated by teachers with the click of a button.
 - 10) **Health Plans & ADHD Data**
 - a) **Health Plans.** Add fields to the SIS to identify students with a health plan, the plan's date, and access to the plan for individuals with permission to do so.

- b) ADHD Data.** Collect and add a data field for the category of ADHD for students with OHI and for students with Section 504 plans and use the data to track prevalence rates, including racial/ethnic composition, performance, and service-related information.
- e. Reports.** Use all relevant data stored in the IEP system to prepare user-friendly reports by school, grade level, class, program, and other categories to inform decision-making at all APS levels.

5. Accountability

Establish a system of accountability that reflects APS's vision of high expectations for all learners and a service delivery model that is proactive rather than reactive – and inclusive in nature.

- a. Advisory Council for Instruction.** Establish a principal of universal design for every curriculum-based/focused advisory committee whereby participants are expected to address all students, including ELLs, and students engaged in MTSS, and students with Section 504 plans and IEPs. To accomplish this purpose, the various committees need access to information and individuals with knowledge about these subgroups of students and issues relevant to areas under review.
- b. APS Strategic Plan**
 - 1) Differentiated Instruction & MTSS.** To improve implementation of APS's Strategic Plan for relating to differentiated instruction and early detection of learning gaps, and its vision of a diverse and inclusive school community, supplement the Strategic Plan with consideration of the MTSS and inclusive education recommendations noted above. When standards related to MTSS and inclusive education are completed, initiate biweekly central office, cross-functional data review meetings to identify exemplary and troubling school trends. Produce and review on a regular basis a profile that shows districtwide progress towards implementation of goals. Have schools include in their school improvement plans an aggressive MTSS implementation process that is based on District expectations, using a common template. Include reporting performance data and other data relevant for MTSS (including the number of students who are on track to graduate) and expected targets for improvement, including targets for students with Section 504 Plans and IEPs.¹⁴³
 - 2) Inclusive Education Targets & Progress Monitoring.** Supplementing the Strategic Plan with appropriate outcome and other measures for inclusive education, including district and differentiated school targets to increase the number of students with an IEP educated in general education classes at least 80% of the time (with appropriate support in their home schools; and decrease the number of students with an IEP educated more than 60% of the time in separate classes. Establish reasonable school-based targets for this area.
- c. School Improvement Plans.** Using a common template, have schools include in their school improvement plans activities designed to move aggressively toward the provision of special education services within an inclusive school model based on district expectations and resources. Establish set protocols for the reporting progress based on expected targets and activities for improvement.
 - 1) For cross-categorical and countywide programs,** collect and analyze data by race/ethnicity, performance over time, and disciplinary referrals to identify exemplary practices and inform the district's planning process.

¹⁴³ See the many resources available on the RtI Action Network website at <http://www.rtinetwork.org>.

- 2) Establish a process for reviewing each student in **private schools**, the type of services they are receiving, their cost, and what it would take for APS to provide comparable or better support within the district.
- d. **Monitoring.** Ensure child find and assessment procedures are followed for students, including ELLs, who may be qualified for IAT, Section 504, and IEP services, and that the services are provided as expected. Develop a variety of strategies to monitor SOPM implementation and its impact on student learning. For example, establish responsibility for monitoring the implementation of standards for the transition of students between grade level schools to ensure appropriate services are planned and provided in a timely manner. Establish walkthrough protocols, and develop user-friendly reports to monitor student performance and implementation of standards. Use this information to modify practices, target resources, and support progress.
 - e. **Personnel Accountability.** Hold personnel accountable for expected results through incentives and consequences that encourage the implementation of standards for practice and fidelity. Make clear each principal's role and responsibility for *all* students in his or her school. Ensure that their evaluations include the important areas for the timely and compliant implementation and oversight of differentiated instruction, MTSS, 504 and special education standards. Establish exemplars with training for evaluating such areas as co-teaching and other supports for inclusive instruction, including areas relevant for ELLs with an IEP.
 - f. **Programmatic Evaluations.** Incorporate a universal design model for all future programmatic evaluations so that they address relevant issues pertinent to MTSS and students with disabilities, including ELLs. In this way, APS can set in motion a process to ensure that evaluations are inclusive of all subgroup populations and their respective needs and avoids unanticipated consequences resulting from a lack of consideration.
 - g. **Data.** Use valid and reliable data to regularly review patterns and trends to monitor SOPM implementation and to inform follow-up action.
 - 1) **Data Clarity & Accuracy.** Identify and address concerns around data clarity and establish a central data source for all Student Services metrics. Ensure all departments know how special education data is captured and classified to avoid potential misrepresentation of data. As additional data is available for students involved with MTSS or a Section 504 plan, ensure individuals have sufficient understanding about its usage.
 - 2) **Disaggregation of Data.** Disaggregate student performance and discipline data by subgroups that include students involved with MTSS, and students with Section 504 plans and IEPs. Further sort this data by race/ethnicity, and ELL. Use this information to identify achievement gaps, modify practices, target resources, and support achievement. Develop systems for the regular disaggregation of special education student-level performance data to identify instructional gaps.
 - 3) **Cross-categorical & Countywide Programs.** Collect and analyze performance and suspension data over time for students in cross-categorical and countywide special education programs overall, by race/ethnicity, grade levels and schools, to identify exemplary practices, assess school improvement, and inform the district's planning process.
 - 4) **Case Studies.** Based on data analyses, periodically conduct case study reviews at school sites for students representative of data reflecting high-risk characteristics to inform future practices. Based on these reviews, determine if different or new standards, training, or other activities are needed.
 - 5) **Students with an IEP Placed in Private Schools.** Review the following for each student placed by

APS in a private school to receive an appropriate education: type of services received; achievement growth; placement cost; and whether APS could provide comparable or superior instruction/services at a similar or reduced cost.

6. Parent, Family & School Partnerships

To promote strong parent, family and school partnerships: increase parent awareness and use of the Parent Resource Center; develop one-page information guides and use the public television system to enhance parent understanding of the MTSS, Section 504 and special education processes; and increase communication between task forces and stakeholders to enhance their effectiveness.

- a. **Parent/Family School Collaboration.** Establish standards developed with the PRC, ASEAC and SEPTA for expectations regarding parent/family school collaboration. Base these standards on research applicable to this subject, such as: *Fostering Parent and Professional Collaboration Research Brief*, Technical Assistance ALLIANCE for Parent Centers, National Parent Technical Assistance Center; and *Encouraging Meaningful Parent/Educator Collaboration: A Review of Recent Literature*, Center for Appropriate Dispute Resolution in Special Education.^{144,145} As part of this process, consider tensions between parent expectations and legal standards and how this collaboration can move to improved communication. Once the standards are established, collaborate with the PRC, ASEAC and SEPTA for broad distribution.
- b. **Parent Resource Center (PRC).** With parent and family stakeholders, meaningfully explore ways to increase parent awareness and use of the PRC. For example, have staff distribute information about the PRC at special education and 504 meetings IEP and offer words of encouragement to parents to support their involvement.
- c. **Parent Guide.** Develop one-page informational guides for parents about the MTSS, 504 and special education processes, key terminology, and frequent questions. Consider using methods, such as webinars, videos, etc., to broaden information sharing.
- d. **Mock Meetings.** Utilize the public television system to hold “mock” MTSS, Section 504 and IEP meetings so that parents are able to maximize their effective participation.
- e. **Task Force Activities.** Provide consistent information to APS staff and ASEAC about task force activities and incorporate their findings and recommendations into special education team meetings several times each school year. Solicit feedback from staff regarding the information and any related needs for professional learning. Without the task forces/committees becoming too large, rotate inclusion of principals and special/general educators from a cross-section of schools to obtain a broader perspective of needs and recommendations. Develop additional task forces as issues under discussion require greater feedback and study to support implementation.

¹⁴⁴ <http://www.parentcenternetwork.org/assets/files/Parent%20and%20Professional%20Collaboration%20Research%20Brief%20-%20Final.pdf>

¹⁴⁵ <http://www.directionservice.org/cadre/exemplar/artifacts/Encouraging%20Meaningful%20Collaboration.pdf>

Additional Recommendations

1. **Post-secondary Transition.** Bring together representatives from ASEAC, SEPTA, representatives (including ESOL/HILT) from each middle and high school who are knowledgeable about transition services, and central office representatives from the Student Services and the Career, Technical and Adult Education departments to discuss challenges and barriers to meaningful and effective postsecondary transition activities and support, including those for students with Asperger's and students with Section 504-only disabilities. Provide research for the group to review, such as information available from the National Center for Secondary Transition and the National Alliance for Secondary Education and Transition, as well as information about the automotive program and how the needs of students with an IEP are addressed.^{146,147} Based on this discussion, identify immediate and long-range steps, including protocol for guiding research-based practices. Also, determine whether access to transition coordinators at the middle school level is financially feasible. In addition:
 - a. **Professional Development.** Identify professional development needed for general and special educators to meet the post-secondary transition needs of students with an IEP and dually identified students; and
 - b. **MAPS.** Review and determine the efficacy of using Making Action Plans (MAPS) for student centered transitional planning.¹⁴⁸
 - c. **Student-led Meetings.** Review literature related to student-led meetings (MTSS, 504, IEP) to support self-advocacy skills and increased student involvement in their educational planning.¹⁴⁹
2. **Related Services.** Review the ratios for related services personnel and the process for determining student need for these services. Establish a monitoring process to ensure implementation of APS standards for eligibility decisions.
3. **Transportation.** Improve transportation services for students with disabilities by taking the following actions:
 - a. **Database.** Develop a special transportation database for school personnel to complete special transportation forms online and link fields to the SIS. This linkage not only ensures strong communication between schools and the transportation department, but having an online form ensures that the schools get essential information from parents, including address changes, alternative drop-off locations, and emergency contact information.
 - b. **Vans.** To reduce reliance on the use of taxis, investigate the costs and benefits of using vans instead. If the use of vans could provide a cost-effective mode of transportation, take the necessary follow-up steps.
 - c. **Planning.** To facilitate effective transportation planning, have Student Services forecast program expansions (e.g., private and APS schools) during meetings with Transportation Department personnel to provide them with as much notice as possible and to facilitate cost-effective

¹⁴⁶ <http://www.ncset.org/>

¹⁴⁷ <http://www.nasetalliance.org/>

¹⁴⁸ MAPS, or Making Action Plans, is a planning process used by teams to help students plan for their futures. It is directed and guided by the student and family and is facilitated by the team members.

<http://www.wiu.k12.pa.us/cms/lib6/PA14000132/Centricity/Domain/12/MAPS.pdf>

¹⁴⁹ See Student-led Individual Education Plans at <http://www.pacer.org/tatra/resources/POD/studentlediep.asp>.

transportation services.

4. **Student Services & DHS Communication.** To support the provision of nursing services, have Student Services initiate monthly meetings with Department of Health Services representatives. Review and address communication and any other issues to minimize coordination problems relating to the dual agency interaction. Work toward a plan to incorporate nurses and nursing staff in the classroom when able to support health education activities.
5. **Medicaid Reimbursement.** Determine the potential for Medicaid reimbursement for nursing and APS related services. Service logging can be completed and submitted electronically, which can make the process more cost-effective while providing a higher rate of return. For nursing services specifically, work with DHS representatives to identify which agency would re-coup costs for DHS nurses providing services to APS students.

APPENDICES

Appendix A: Team Member Biographies

Sue Gamm, Esq., a special educator and attorney, has spent the past 40 years specializing in the study and understanding of policies, procedures and practices impacting the systemic and effective education of students with disabilities. Sue has blended her legal and special education programmatic expertise and unique experience as the chief specialized services officer for the Chicago Public Schools, attorney and division director for the Office for Civil Rights (U.S. Department of Education) and special educator to become a highly regarded national special education expert as an author, presenter, consultant and evaluator of system-wide policies and practices. Sue has consulted with the Public Consulting Group (PCG) since May 2003. In addition to her consultation with PCG, she has drafted manuals for the effective administration and operation of special education services for more than 10 school districts and was a helped draft a white paper for the Counsel of Great City Schools on embedding RtI in Common Core Standards implementation. Independently and through these organizations, Sue has conducted over 30 system wide special education reviews of urban school districts in more than 20 states, including those in collaboration with the Council of Great City Schools and the Urban Special Education Leadership Collaborative. From her unique perspective Sue has shared her knowledge of IDEA and its related issues at numerous national, state and local conferences and has authored numerous periodicals and publications for LRP Publications.

Anna d'Entremont, a senior consultant at PCG, brings extensive 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. Prior to joining PCG, 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 ensured schools met district and state requirements for this population. 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 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.

Patricia Crowley, a Project Lead at PCG has more than 30 years as a senior administrator in special education in the Boston Public Schools, dealing mainly with compliance issues. 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.

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Jane Kaplan, a consultant at PCG, works with the Office of the State Superintendent of Education (OSSE) to enhance the District of Columbia's Special Education Data System (SEDS). Her role includes implementing upgrades to PCG's proprietary software solution, EasyIEP™, and improving Federal reporting features. Other projects include Medicaid Fee-For-Service billing to generate revenue for the District of Columbia Public Schools, and EasyIEP™ implementation in Miami-Dade County Public Schools and the Indiana Department of Education for the state of Indiana. She also served as project manager on an evaluation of the Student Services Department for Arlington Public Schools (VA). Jane holds both a Masters in Business Administration and a Bachelor of the Arts in Management from Clark University and is also a member of the Beta Gamma Sigma Honor Society.

Appendix B: Documents Received from District

1. Department of Student Services Management Plan
2. Arlington Public Schools Strategic Plan 2011-2017
3. Arlington Public Schools Strategic Plan 2005-2011
4. English Language Arts Curriculum
5. School Board's Adopted Budget FY 2012
6. Department of Instruction Organizational Chart
7. Evaluation Summary by Evaluation for Professional Development Sessions
8. Transcripts
9. Registration Session Statistics
10. Superintendent's Entry Plan Document Review, Hanover Research Council
11. Arlington Public Schools School Management Plan
12. School Management Plans by School, 2011-2012
13. Pupil Services Accountability Form
14. Other APS Program Evaluation
15. Bridge Manual
16. Comprehensive User Guide for Discipline, Crime and Violence (DCV) Data Collection and Submission
17. ESOL/HILT Checklist-Elementary
18. ESOL/HILT Checklist-Secondary
19. ESOL/HILT – Two Way Immersion(TWI) Programs Documents
20. Arlington Public Schools Strategic Plan for Meeting the Needs of Students with Mental Illness
21. APS Special Education Completer Survey Results
22. VDOE Career and Technical Education
23. VDOE Homeward Bound Instructional Committee Documents
24. VA Partners in Leadership Spring 2012 Site Review of APS
25. Classroom Assessment Scoring System (CLASS) Documents
26. Programs and Courses at the APS Career Center
27. New Teacher Evaluation Documents
28. Student Outcome Information
 - a. Virginia Standard of Learning Program: Record Description for Summary Records Non-Writing Tests, Grades 3-8
 - b. Virginia Standards of Learning Program: Record Description for Student-Level Records Writing Tests, Grades 5, 8 and EOC
 - c. VAAP, VGLA, VSEP: Record Description for Student Level Records 2010-2011
 - d. Standards of Learning 2010, Comparison: Arlington Public Schools, Virginia and Selected Divisions
 - e. Standards of Learning 2010 English/Reading, Comparison: Arlington Public Schools, Virginia and Selected Divisions
 - f. Standards of Learning 2010 History/Social Sciences, Comparison: Arlington Public Schools, Virginia and Selected Divisions
 - g. Standards of Learning 2010 Students with Limited English Proficiency, Comparison: Arlington Public Schools, Virginia and Selected Divisions

- h. Standards of Learning 2010 Mathematics, Comparison: Arlington Public Schools, Virginia and Selected Divisions
 - i. Standards of Learning 2010 Science, Comparison: Arlington Public Schools, Virginia and Selected Divisions
 - j. Standards of Learning 2010 Students with Learning Disabilities, Comparison: Arlington Public Schools, Virginia and Selected Divisions
29. Intervention Assistance Team Documentation
- a. IAT School Level Evaluation Summary
 - b. Intervention Assistance Teams-Seven Critical Components of the IAT Process: Strategies that Work
 - c. Intervention Assistance Team Process
 - d. Special Education Program Evaluation: Information Requested --School Level IAT: General Education Interventions
 - e. APS Elementary ESL & Math Assessment Schedule 2011-2012
 - f. News for Teachers: K-8 Formative Assessment Initiative
 - g. Fall IAT Meeting Agenda 2009-2010 School Year
 - h. Introduction IAT Training Agenda
 - i. Memorandum Participation of ESOL/HILT Staff in IAT Meetings
 - j. Intervention Assistance Teams Collaborative Team Problem Solving Guiding Principles and Assumptions
 - k. Intervention Assistance Teams: Introduction Training Department of Instruction, April 18, 2006
 - l. Intervention Assistance Teams: Introduction Training, Department of Student Services February 15, 2006
 - m. Intervention Assistance Teams: Introduction Training, Swanson Middle School, February 21, 2007
 - n. Intervention Assistance Teams: Introduction Training, Wakefield High School, February 9, 2006
 - o. Intervention Assistance Teams: Special Education Advisory Committee, September 30, 2008
 - p. Intervention Assistance Teams: Introduction Training, Assistant Principals, May 21, 2007
 - q. Intervention Assistance Teams: Introduction Training, Office of Minority Achievement, April 6, 2008
 - r. Fall IAT Meeting, 2008-2009 School Year Agenda
 - s. Fall IAT Meeting, 2009-2010 School Year Agenda
 - t. School Level IAT Evaluation, May 11, 2010
 - u. Read180 Presentation, November 2011
 - v. ReadAbout Presentation, November 2011
30. Special Education Documentation
- a. Organization Chart
 - b. Special Education Review Committee (SERC)
 - c. Special Education Annual Plan 2011
 - d. APS Continuum of Services Options-Vertical Planning Chart
 - e. Arlington County Community Assessment Team
 - f. Assistive Technology Equipment Inventory and Referral Documents
 - g. Note from the Office of Instructional Technology
 - h. IDEA budget

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- i. Special Education Parent Resource Center: Understanding Special Education (USE)
 - j. Special Education Parent Resource Center: Becoming an Active Member of your Child's IEP Team
 - k. Sample APS Progress Report
 - l. Arlington Public Schools Special Education Parent Resource Center (PRC) Overview
 - m. Department of Student Services Management Plan 2011-2012
 - n. State Performance Plan Indicators
 - o. Addressing Over-Representation of African American Students in Special Education
 - p. Preventing Disproportionate Representation: Culturally and Linguistically Responsive Preferential Interventions
 - q. Overrepresentation of Black Students in Special Education presentation 2004
 - r. Overrepresentation of Minority Students in Special Education presentation 2006
 - s. Superintendent's Advisory Committee on the Elimination of the Achievement Gap, May 11, 2009
 - t. Culturally Responsive Practice In Schools: The Checklist to Address Disproportionality: Early Intervention Services
 - u. Procedures for Implementing Regulations Governing Special Education Programs for Children with Disabilities in Arlington, VA, effective July 7, 2009
 - v. Appendices for Policy and Procedures Implementation Manual
 - w. Fiscal data
 - x. Special Education Corrective Action Plan
 - y. Corrective Action Plan for Indicators 11 and 13
 - z. Memorandum from VDOE about corrected percentages for Indicator 13 in 2010
 - aa. Previous ASEAC Committee Report
 - bb. Federal Program Monitoring on-site review results
 - cc. Memo(s) to Dr. Murphy from VDOE
 - dd. Review of Best Practices and Issues in Special Education, Hanover Research
 - ee. Special Education Program Strategic Development
 - ff. Department of Student Services Budget Presentation-2012
31. Section 504 Documentation
- a. Memorandum 504 Verification Process and Forms
 - b. Question and Answers about Section 504 and Parental Rights Brochure (inside and outside cover)
 - c. 504 Professional Development List
 - d. Schedule of 504 Trainings
 - e. Section 504 Guidelines, Revised June 2008
 - f. Section 504 Guidelines, Revised October 2011
 - g. Section 504 Guidelines, Draft January 2012
 - h. ADHD Task Force Strategic Plan
 - i. 504 Data-OCR Civil Rights Data

Appendix C. IAT Parent Survey

Survey of Parents of Students Receiving IAT Services

PCG Education has been contracted by the Arlington Public Schools to conduct an evaluation of the district's intervention assistance team (IAT) services. The purpose of the evaluation is to identify program strengths and areas for improvement. We would appreciate you taking a short amount of time to complete this survey to help us know about your experience as a parent of a child receiving IAT services. If you have more than one child receiving IAT services, we would appreciate the additional time necessary to complete a separate survey for EACH of your children. Your answers will be confidential.

Section 1 — About You and Your Child

1. Child's Age:

6–10 11–13 14–17 18–22

2. Child's Gender:

Male Female

3. Please identify the school your child is currently enrolled in: Drop-down of all schools in Arlington

4. Please identify the grade level your child is currently enrolled in.

Pre-Kindergarten Elementary (K–5)
 Middle School (6–8) High School (9+)
 Alternative Program

Section 2 — Your Participation and Your Child's IAT Plan

	Yes	No	Don't Know
1. Did APS staff explain to why your child is receiving IAT services in a way that you were able to understand?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Did someone from APS offer answer questions you have?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Prior to and during the process of developing your child's IAT plan, was your school responsive to your concerns about your child's progress and performance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. At any time, have you asked for or discussed special education services (IEP) or a Section 504 plan for your child who has an IAT plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No	Don't Know
5. Do you think the IAT process is delaying consideration of special education services or Section 504 services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Are you aware that the IAT process is not required before your child may be considered for special education or a section 504 plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Did you have the opportunity to take part in the development of your child's most recent IAT plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Do you get routine reports, e.g., progress reports, on how he/she is meeting his/her IAT goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Does the district offer opportunities for parent training or information sessions about IAT services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. In the past year, have you attended parent training or information sessions offered by the district?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. If yes to question 10, how did you learn about the training?			
12. Have you visited the Parent Resource Center?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you speak a language other than English and have asked for an interpreter, please answer the questions below.

13. Is an interpreter provided at IEP meetings to interpret the information you need to know about your child?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Was it easy for you to schedule your meeting with an interpreter in a timely manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Are the interpreter services provided at the IAT meeting effective—do they help you understand all the information you need to know?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section 3 — Your Satisfaction with Your Participation and Your Child's Services and Progress

Please use the following Rating Scale to indicate your level of agreement/satisfaction for the areas described in this section of the survey.

Strongly Agree:	This is/was <i>almost always true.</i>
Agree:	This is/was <i>true most of the time.</i>
Disagree:	This is/was <i>not true most of the time.</i>
Strongly Disagree:	This is/was <i>almost never true.</i>
Don't Know:	<i>I don't know.</i>

Strongly Agree **A**g
 Disagree **r**
 Strongly Disagree **e**
 Don't Know

Satisfaction with My Participation

- | | | | | | | |
|----|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. | In planning my child's most recent IAT plan, I felt I was a valued member and my opinion was respected. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. | I understand what is discussed at IAT meetings. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. | I feel comfortable asking questions and expressing concerns at IAT meetings. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. | I understand what services are being provided to my child under the IAT plan, by whom, and how often. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. | I understand how progress on the IAT plan is being monitored, by whom, and how often. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. | Teachers/school staff have communicated effectively with me. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. | I am getting adequate information about my child's performance. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. | Reports about my child's progress effectively communicate positive progress and/or lack of progress. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. | The parent training or information sessions that I have attended have been helpful to me. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Satisfaction with My Child's Program

- | | | | | | | |
|----|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. | I am satisfied with my child's overall IAT program. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. | My child's teachers are aware of his/her learning needs. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. | The teaching staff have high enough expectations for my child to ensure continued progress. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. | I believe my child's academic program is preparing him or her effectively for the future performance | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. | I believe my child is receiving positive behavior support that is helping his or her behavior improve. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

6. I am satisfied with my child's overall academic progress in school.

Please indicate any training and/or topics that you would like more information about.

- | | |
|--|--|
| <input type="checkbox"/> Understanding the IAT Process | <input type="checkbox"/> Supporting Positive Behavior |
| <input type="checkbox"/> Learning and Homework Strategies | <input type="checkbox"/> Special Education services in Arlington |
| <input type="checkbox"/> The difference between IAT, special education (IEP) and section 504 plans | <input type="checkbox"/> Other _____ |

6. Conflict Resolution

	Yes	No	Don't Know
1. Have you had disagreements with the School regarding your child's IAT process or IAT plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. If yes, please indicate any of the following that reflect your experience:			
a. APS representatives treated me with respect.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. I was satisfied with how the district or school attempted to resolve the disagreements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7. **What do you think your child's school does well to help your child?**

8. **What do you think your child's school can do to help your child more?**

9. **Other comments, questions or concerns.**

Appendix D. IAT Student Survey

Survey of Students with IAT Plans

PCG Education has been contracted by the Arlington Public Schools to conduct an evaluation of the district's services for students with IATs. Please complete this survey to give information about what works well and any areas for improvement. No one in the school district will see your answers – they are private. Thank you for participating in this survey, your comments are important.

Section 1 — About You

1. Your Age:

- 14 years
 15 years
 16 years
 17 years
 18–22 years

2. Your Gender:

- Male
 Female

3. Your School: Drop-down of all high schools including secondary programs in Arlington

4. Your Grade

- 9th
 10th
 11th
 12th
 I don't know

Section 2 — Participation in the IAT Process

	Y es	No	Don't Know
1. Did APS staff explain to you why you needed an intervention or IAT services in a way that you were able to understand?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Did someone from APS answer questions you have?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Did you attend your most recent IAT meeting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Do you know what goals your IAT Plan expects you to achieve?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Do you know what kind of interventions and support you are receiving because of your IAT Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Do you receive the services on your IAT Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. If you feel you are not receiving the interventions or other supports that you are supposed to, do you ask someone for help?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Do the interventions and supports you receive help you do better in school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Y
es No Don't Know

9. Do you speak a language at home that is different from school?

Section 3 —Satisfaction

Please use the following Rating Scale to indicate your level of satisfaction described in this section of the survey.

Strongly Agree: This is *almost always true.*
Agree: This is *true most of the time.*
Disagree: This is *not true most of the time.*
Strongly Disagree: This is *almost never true.*
Don't Know: *I don't know.*

	Strongly Agree	Agree	Disagree	Strongly Disagree	N/A
1. I feel OK about asking questions about my IAT at meetings.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. My teachers talk with me about my progress in school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. My teachers have high enough expectations for me.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. My teachers are giving me the help I need.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Other students treat me fairly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. I receive the help I need to do well in school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. I do not need help with my behavior.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. I am welcomed, valued, and respected in school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. My teachers understand me and support me.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. I am getting skills that will help me be as independent as possible after high school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. I like school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Please indicate any area you would like more information about.					
<input type="checkbox"/> Homework and Study Strategies				<input type="checkbox"/> Help with Positive Behavior	
<input type="checkbox"/> Organization Strategies				<input type="checkbox"/> Other: _____	

13. What do you think your school does well to help you?

14. What do you think your school can do to help you more?

Appendix E. Section 504 Parent Survey

Survey of Parents of Children with Section 504 Plans

PCG Education has been contracted by the Arlington Public Schools to conduct an evaluation of the district's Section 504 program. The purpose of the evaluation is to identify program strengths and areas for improvement. We would appreciate you taking a short amount of time to complete this survey to help us know about your experience as a parent of a child receiving Section 504 accommodations. If you have more than one child with a Section 504 plan, we would appreciate the additional time necessary to complete a separate survey for EACH of your children. Your answers will be confidential. Thank you for participating in this survey, your comments are important.

Section 1 — About You and Your Child

1. Child's Age:

2 3–5 6–10 11–13 14–17 18–22

2. Child's Gender:

Male Female

3. Please identify the grade level your child is currently enrolled in.

Pre-Kindergarten Elementary (K–5)
 Middle School (6–8) High School (9+)
 Alternative Program

4. Please identify the school your child is currently enrolled in: Drop-down of all schools in Arlington

5. Please identify in which grade level your child was identified for Section 504 accommodations.

PK K–2 3–6 7–8 9–12+

6. Type of Disability

Health Behavioral
 Attention Deficit Hyperactivity Disorder Other
 Don't Know

Section 2 — Your Participation and Your Child’s 504 Plan

	Yes	No	Don't Know
1. Did APS staff explain to you why your child is receiving Section 504 accommodations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Prior to and during the process of obtaining a Section 504 plan, was your school responsive to your concerns about your child’s progress and performance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Do you receive a copy of your parental rights (procedural safeguards) from APS at least once each year?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Did someone from APS offer to explain your rights to you and answer questions you have?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Did you have the opportunity to take part in the development of your child’s most recent Section 504 plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Are you invited to a Section 504 meeting at least once a year?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. During the process of developing your child’s Section 504 plan, were your requests for modifications and/or accommodations considered?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. At any time, have you asked for special education services for your child who has a Section 504 plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Is your child consistently receiving all of the accommodations and modifications that are listed on his/her Section 504 Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Does the district offer opportunities for parent training or information sessions about Section 504 supports?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. In the past year, have you attended parent training or information sessions offered by the district?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. If yes to question 10, how did you learn about the training?			
13. Have you visited the Parent Resource Center?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you speak a language other than English and have asked for an interpreter, please answer the questions below.

14. Is an interpreter provided at 504 meetings to interpret the information you need to know about your child?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	--------------------------

	Yes	No	Don't Know
15. Was it easy for you to schedule your 504 meeting with an interpreter in a timely manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Are the interpreter services provided at the Section 504 meeting effective — do they help you understand all the information you need to know?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section 3 — Your Satisfaction with Your Participation and Your Child's Program and Progress

Please use the following Rating Scale to indicate your level of agreement/satisfaction for the areas described in this section of the survey.

Strongly Agree: This is/was *almost always true.*
Agree: This is/was *true most of the time.*
Disagree: This is/was *not true most of the time.*
Strongly Disagree: This is/was *almost never true.*
Don't Know: *I don't know.*

	Strongly Agree	Agree	Disagree	Strongly Disagree	Don't Know
Satisfaction with My Participation					
1. In planning my child's most recent Section 504 plan, I felt I was a valued member of the team and my opinion was respected.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. The information I provided about my child was considered when planning and writing his/her most recent plan.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. In <u>implementing</u> my child's Section 504 plan, I feel I am a respected partner with my child's teachers and other support providers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. I understand what is discussed at Section 504 meetings.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. I feel comfortable asking questions and expressing concerns at Section 504 meetings.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Teachers/school staff have communicated effectively with me.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. School staff respond to my concerns in a reasonable period of time.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. I am getting adequate information about my child's performance.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9. My child's progress report effectively communicates positive progress and/or lack of progress.
10. The parent training or information sessions that I have attended have been helpful to me.

Satisfaction with My Child's Program

1. I am satisfied with my child's overall Section 504 program.
2. My child's teachers are aware of his/her learning needs.
3. The teaching staff have high enough expectations for my child to ensure continued progress.
4. I feel my child's academic program is preparing him/her effectively for the future.
5. Section 504 staff are skilled in providing the services and support my child needs.

Satisfaction with My Child's Participation and Progress

1. I am satisfied with my child's overall progress in school.
2. My child is developing skills that will enable him/her to be as independent as possible.
3. I am satisfied with school district transition planning for my child (if applicable):
- a. From Preschool to Kindergarten
- b. From Elementary School to Middle School
- c. From Middle School to High School

Please indicate any training and/or topics that you would like more information about.

- Understanding the Section 504 Process Supporting Positive Behavior
- Learning and Homework Strategies Other: _____

6. Conflict Resolution

	Yes	No	Don't Know
1. Have you had disagreements with APS regarding your child's eligibility, placement, goals, services, or implementation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. If yes, please indicate any of the following that reflect your experience:			
a. APS representatives treated me with respect.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. I was satisfied with how the district or school attempted to resolve the disagreements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7. What do you think your child's school does well to help your child?

8. What do you think your child's school can do to help your child more?

9. Other comments, questions or concerns.

Appendix F. Section 504 Student Survey

Survey of Students with Section 504 Plans

PCG Education has been contracted by the Arlington Public Schools to conduct an evaluation of the district's Section 504 program. Please complete this survey to give information about what works well and any areas for improvement. No one in the school district will see your answers – they are private. Thank you for participating in this survey, your comments are important.

Section 1 — About You

1. Your Age:

- 14 years 15 years 16 years 17 years 18–22 years

2. Your Gender:

- Male Female

3. Your School: Drop-down of all high schools in Arlington

4. Your Grade

- 9th 10th 11th 12th I don't know

5. Disability Area (choose only one):

- Health Behavior ADHD Other I don't know

Section 2 — Your Participation in the Section 504 Process

	Yes	No	Don't Know
1. Do you understand why you are receiving Section 504 accommodations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Did you attend your most recent Section 504 meeting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Have you seen your Section 504 plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are you consistently receiving all of the supports and accommodations written in the Section 504 plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. If you are 18 years of age, do you receive a copy of your rights from the district and does someone from APS answer any questions you may have?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section 3 —Your Satisfaction

Please use the following Rating Scale to indicate your level of satisfaction described in this section of the survey.

Strongly Agree: This is *almost always true*.
Agree: This is *true most of the time*.
Disagree: This is *not true most of the time*.
Strongly Disagree: This is *almost never true*.
Don't Know: *I don't know*.

		Strongly Agree	Agree	Disagree	Strongly Disagree	Don't Know
1.	I feel OK about asking questions about my Section 504 Plan at meetings.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	The information I provided was considered.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	My teachers talk to me about the progress I am making.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	My teachers (or nurses) are giving me the help I need.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	My teachers understand me and support me..	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	I receive the help I need to do well in school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	I do not need help with my behavior.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Other students treat me fairly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.	I am welcomed, valued, and respected in school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.	I am getting skills that will help me be as independent as possible after high school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11.	I like school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1. Please indicate any area you would like more information about.

- | | |
|--|---|
| <input type="checkbox"/> Understanding the Section 504 Process
<input type="checkbox"/> Homework Strategies | <input type="checkbox"/> Help with Positive Behavior
<input type="checkbox"/> Other: _____ |
|--|---|

FINAL REPORT

Evaluation of APS Services for Students with Special Needs

January 2013

13. What do you think your school does well to help you?

14. What do you think your school can do to help you more?

Appendix G. IEP Parent Survey

Survey of Parents of Students with Disabilities

PCG Education has been contracted by the Arlington Public Schools to conduct an evaluation of the district's special education services. The purpose of the evaluation is to identify program strengths and areas for improvement. We would appreciate you taking a short amount of time to complete this survey to help us know about your experience as a parent of a child receiving special education services. If you have more than one child on an Individualized Education Program (IEP), we would appreciate the additional time necessary to complete a separate survey for EACH of your children. Your answers will be confidential. Thank you for participating in this survey; your comments are important.

Section 1 — About You and Your Child

1. Child's Age:

- 2 3–5 6–10 11–13 14–17 18–22

2. Child's Gender:

- Male Female

3. Please identify the grade level your child is currently enrolled in.

- Pre-Kindergarten Elementary (K–5)
 Middle School (6–8) High School (9+)
 Alternative Program

4. Please identify the school your child is currently enrolled in: Drop-down of all schools & programs in Arlington

5. Please identify in which grade level your child was identified for special education services and received an IEP.

- Pre-Kindergarten Elementary (K–5)
 Middle School (6–8) High School (9+)
 Alternative Program

6. Primary Eligibility (choose only one): (note – based on VA regulatory categories)

- Autism Speech or Language Impairment
 Developmental Delay Emotional Disability
 Intellectual Disability Other Health Impairment

FINAL REPORT

Evaluation of APS Services for Students with Special Needs

January 2013

- | | | | |
|--------------------------|---|--------------------------|--|
| <input type="checkbox"/> | Multiple Disabilities | <input type="checkbox"/> | Traumatic Brain Injury |
| <input type="checkbox"/> | Orthopedic Impairment | <input type="checkbox"/> | Deaf-Blindness |
| <input type="checkbox"/> | Hearing Impairment (including Deafness) | <input type="checkbox"/> | Visual-Impairment, including Blindness |
| <input type="checkbox"/> | Specific Learning Disability | <input type="checkbox"/> | Don't Know |

- | | Yes | No |
|--|--------------------------|--------------------------|
| 7. Does your child receive English for speakers of other languages (ESOL)/ High Intensity Language Training(HILT) Services? | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. If you moved into the Arlington Public Schools, did your child receive an IEP prior to enrolling in the Arlington Public Schools? | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. If you moved into the Arlington Public Schools, was the district's reputation for providing special education services one of the reasons why you chose to move here? | <input type="checkbox"/> | <input type="checkbox"/> |

Section 2 — Your Participation and Your Child's IEP

- | | Yes | No | Don't Know |
|--|--------------------------|--------------------------|--------------------------|
| 1. Did APS staff explain to you why your child needed special education services in a way that you were able to understand? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Are you offered a copy of your parental rights (procedural safeguards) from APS at least once each year? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Did someone from APS offer to explain your rights to you or answer questions you have? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Did you have the opportunity to take part in the development of your child's most recent IEP? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Do you receive notice of an IEP meeting at least once a year? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. At your child's most recent IEP meeting, did the team discuss the possibility of receiving special education services in the general education class to the maximum extent appropriate? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Is your child getting the number and amount of services that are listed on his/her IEP, e.g., speech two times a week for 30 minutes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. Do you get routine reports, e.g., progress reports, on how he/she is meeting his/her IEP goals? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Does the district offer opportunities for parent training or information sessions about special education services? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- | | Yes | No | Don't Know |
|--|--------------------------|--------------------------|--------------------------|
| 10. In the past year, have you attended parent training or information sessions offered by the district? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. If yes to question 10, how did you learn about the training? | | | |
| 12. Have you visited the Parent Resource Center? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Answer only if your child is age 14 years or older

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| 13. Did your child receive an assessment to help develop age appropriate postsecondary goals related to training, education, employment and where appropriate independent living skills? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 14. Has the team developed individualized goals related to postsecondary education, employment, independent living, and community participation, as appropriate? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 15. Did the IEP team discuss transition to adulthood during the IEP meeting, e.g., career interests? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 16. Does APS actively encourage your child to participate in IEP meetings? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

If you speak a language other than English and have asked for an interpreter, please answer the questions below.

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| 17. Is an interpreter provided at IEP meetings to interpret the information you need to know about your child? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 18. Was it easy for you to schedule your IEP meeting with an interpreter in a timely manner? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 19. Are the interpreter services provided at the IEP meeting effective—do they help you understand all the information you need to know? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Section 3 — Your Satisfaction with Your Participation and Your Child's Services and Progress

Please use the following Rating Scale to indicate your level of agreement/satisfaction for the areas described in this section of the survey.

- | | |
|---------------------------|--|
| Strongly Agree: | This is/was <i>almost always true.</i> |
| Agree: | This is/was <i>true most of the time.</i> |
| Disagree: | This is/was <i>not true most of the time.</i> |
| Strongly Disagree: | This is/was <i>almost never true.</i> |
| Don't Know: | <i>I don't know.</i> |

Strongly Agree Agree Disagree Strongly Disagree Don't Know

Satisfaction with My Participation

- | | | | | | | |
|-----|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. | In planning my child's most recent IEP, I felt I was a valued member of the IEP team and my opinion was respected. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. | The information I provided about my child was considered in planning and writing his/her most recent IEP. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. | In developing my child's IEP, I feel I am a respected partner with my child's teachers and other service providers. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. | I understand what is discussed at IEP meetings. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. | I feel comfortable asking questions and expressing concerns at IEP meetings. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. | Teachers/school staff have communicated effectively with me. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. | School staff respond to my concerns in a reasonable period of time. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. | I am getting adequate information about my child's performance. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. | My child's progress report effectively communicates positive progress and/or lack of progress. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. | The parent training or information sessions that I have attended have been helpful to me. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Satisfaction with My Child's Program

- | | | | | | | |
|----|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. | I am satisfied with my child's overall special education services. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. | My child's teachers are aware of his/her learning needs. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. | My child's therapists, e.g., occupational therapist, physical therapist, speech-language pathologist, are aware of his/her learning needs | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. | My child's English for speakers of other languages (ESOL) needs are provided for in addition to his/her special education needs. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- | | | | | | | |
|----|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 5. | The teaching staff, including therapists, has high enough expectations for my child to ensure continued progress. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. | I feel my child's academic program is preparing him/her effectively for the future. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. | Special education staff, including therapists, are skilled in providing the services and support my child needs | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. | A general education teacher comes to my child's IEP meeting when general education is being considered. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Strongly Agree Agree Disagree Strongly Disagree Don't Know

Satisfaction with My Child's Participation and Progress

- | | | | | | | |
|----|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. | I am satisfied with my child's overall academic progress in school. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. | My child is developing skills that will enable him/her to be as independent as possible. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. | My child has the opportunity to participate in school-sponsored activities such as assemblies, field trips, clubs, and sporting events. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. | I am satisfied with school district transition services for my child (if applicable): | | | | | |
| d. | From Preschool to Kindergarten | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. | From Elementary School to Middle School | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. | From Middle School to High School | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g. | Planning for transition to postsecondary education, employment, independent living, and community living options | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

5. Please indicate any training and/or topics that you would like more information about.

- | | | | |
|--------------------------|--|--------------------------|------------------------------|
| <input type="checkbox"/> | Arlington Special Education Advisory Committee (ASEAC) | <input type="checkbox"/> | Supporting Positive Behavior |
| <input type="checkbox"/> | Learning and Homework Strategies | <input type="checkbox"/> | Complaint Resolution |

- | | |
|--|---|
| <input type="checkbox"/> Understanding the Special Education Process | <input type="checkbox"/> Special Education PTA |
| <input type="checkbox"/> Transition Planning | <input type="checkbox"/> APS Parent Resource Center |
| <input type="checkbox"/> Autism | <input type="checkbox"/> Other: _____ |

6. Conflict Resolution

	Yes	No	Don't Know
1. Have you had disagreements with the School regarding your child's eligibility, placement, goals, services, or implementation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. If yes, please indicate any of the following that reflect your experience:			
a. APS representatives treated me with respect.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. I was satisfied with how the district or school attempted to resolve the disagreements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7. What do you think your child's school does well to help your child?

8. What do you think your child's school can do to help your child more?

9. Other comments, questions or concerns.

Appendix H. IEP Student Survey

Survey of Students with IEPs

PCG Education has been contracted by the Arlington Public Schools to conduct an evaluation of the district's services for students with IEPs. Please complete this survey to give information about what works well and any areas for improvement. No one in the school district will see your answers – they are private. Thank you for participating in this survey, your comments are important.

Section 1 — About You

1. Your Age:

- 14 years 15 years 16 years 17 years 18–22 years

2. Your Gender:

- Male Female

3. Your School: Drop-down of all high schools including secondary programs in Arlington

4. Your Grade

- 9th 10th 11th 12th I don't know

5. Disability (choose only one):

- | | |
|--|--|
| <input type="checkbox"/> Autism | <input type="checkbox"/> Speech or Language Impairment |
| <input type="checkbox"/> Developmental Delay | <input type="checkbox"/> Emotional Disability |
| <input type="checkbox"/> Intellectual Disability | <input type="checkbox"/> Other Health Impairment, or Attention Deficit Hyperactivity Disorder (ADHD) |
| <input type="checkbox"/> Multiple Disabilities | <input type="checkbox"/> Traumatic Brain Injury |
| <input type="checkbox"/> Orthopedic Impairment | <input type="checkbox"/> Deaf-Blindness |
| <input type="checkbox"/> Hearing Impairment (including Deafness) | <input type="checkbox"/> Visual-Impairment, including Blindness |
| <input type="checkbox"/> Specific Learning Disability | <input type="checkbox"/> Don't Know |

Section 2 — Participation in the IEP Process

- | | Yes | No | Don't Know |
|--|--------------------------|--------------------------|--------------------------|
| 1. Did APS staff explain to you why you needed special education services in a way that you were able to understand? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Did you attend your most recent IEP meeting? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

	Yes	No	Don't Know
3. Did you feel that your views and comments were respected and considered by the IEP team?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Do you have most of your classes in general education, in classes also attended by students without IEPs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Do you know what goals your IEP expects you to achieve?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Do you know what accommodations are on your IEP (if any)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. If you feel you are not receiving an accommodation or service that you are supposed to, do you ask someone for help?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Do you receive the services on your IEP?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Do you think that you are spending too much time in special education classes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Do the special education services you receive help you in other classes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. I have NOT been suspended from school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Do you speak a language at home that is different from school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Do you get information about the progress you are making on your IEP goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Did someone talk to you about what you want to do after you graduate from high school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Did someone talk to you about your career interests?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Are you learning things in high school to help you with your goals after you graduate high school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. If you are 18 years of age or older, are you offered a copy of your rights from APS at least once each year and answer your questions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section 3 —Satisfaction

Please use the following Rating Scale to indicate your level of satisfaction described in this section of the survey.

Strongly Agree: This is *almost always true.*
Agree: This is *true most of the time.*

Disagree: This is *not true most of the time.*
Strongly Disagree: This is *almost never true.*
Don't Know: *I don't know.*

	Strongly Agree	Agree	Disagree	Strongly Disagree	Don't Know
1. I feel OK about asking questions about my IEP at meetings.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. School staff (for example, teachers, transition coordinators, and speech therapists) talk with me about my IEP.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. My teachers have high enough expectations for me.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. My teachers talk with me about my progress in school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. I receive the help I need to do well in school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. I do not need help with my behavior.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. My teachers are giving me the help I need.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. My teachers understand me and support me.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. If I want, I can be in after school activities like clubs, sports, etc	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Other students treat me fairly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. I am welcomed, valued, and respected in school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. I receive the help I need to do well in school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. I am getting skills that will help me be as independent as possible after high school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. I like school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

15. Please indicate any area you would like more information about.

- | | |
|---|--|
| <input type="checkbox"/> Homework Strategies | <input type="checkbox"/> Help with Positive Behavior |
| <input type="checkbox"/> Life After High School | <input type="checkbox"/> Other: _____ |

16. What do you think your school does well to help you?

17. What do you think your school can do to help you more?

Appendix I. Staff Survey

Arlington Public School Staff Survey

PCG Education has been contracted by the Arlington Public Schools to conduct an evaluation of the district's Special Education (IEP) services, Intervention Assistance Team (IAT) services, and services provided to students with Section 504 plans. The purpose of the evaluation is to identify program strengths and areas for improvement.

Section 1 — School Level/Population You Serve

1. **School you serve:** Drop-down of all schools and programs in Arlington

2. **School level you serve:**

- | | |
|--|---|
| <input type="checkbox"/> Pre-Kindergarten | <input type="checkbox"/> Elementary (K–5) |
| <input type="checkbox"/> Middle School (6–8) | <input type="checkbox"/> High School (9+) |
| <input type="checkbox"/> Alternative Program | <input type="checkbox"/> All grades (PK-12) |

3. **Please select one of the following to describe your position relative to special education services.**

- | | |
|---|--|
| <input type="checkbox"/> Special Education Teacher | <input type="checkbox"/> General Education Teacher with students with special education needs in classes this year or last year. |
| <input type="checkbox"/> Paraprofessional (including COTA, PTA) | <input type="checkbox"/> Administrators |
| <input type="checkbox"/> Itinerant Staff | |
| <input type="checkbox"/> Related Service Provider (OT, PT, SLP, Therapist, Substance Abuse Counselor, etc.) | <input type="checkbox"/> Other: _____ |

Select the population of students you work with:

	Yes	No
1. Students with Individualized Education Plans	<input type="checkbox"/>	<input type="checkbox"/>
2. Students with Intervention Assistance Teams	<input type="checkbox"/>	<input type="checkbox"/>
3. Students with 504 Plans	<input type="checkbox"/>	<input type="checkbox"/>

Section 2 — Your Experiences with the Special Education Program

Please use the following Rating Scale to indicate your level of agreement with the items described in this survey. Your rating should best reflect your experiences with Section 504 services and students with Section 504 plans in your school.

- Strongly Agree:** This is *almost always true*.
Agree: This is *true most of the time*.
Disagree: This is *not true most of the time*.
Strongly Disagree: This is *almost never true*.
Don't Know: *I don't know*.

		Strongly Agree	Agree	Disagree	Strongly Disagree	Don't Know
A. Special Education Processes and Surveys						
1.	Overall, I believe that my school delivers highly effective education programs and services for students with disabilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	When relevant for the student, before the school makes a referral to special education, the school makes every attempt to meet the unique needs of students through the IAT process.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	If a student in dually identified, an ESOL/HILT teacher is consulted and participates in meetings.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Our school has a well defined and systematic process for implementing interventions prior to referral	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	The ESOL/HILT checklist is utilized in the referral process for students who speak another language	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	A lack of sufficient reading intervention support is a major reason for referral for a special education evaluation in this school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	The ESOL/HILT checklist is helpful to me in making decisions or plans for students who are struggling.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	The evaluations conducted through the special education process are sufficiently comprehensive to identify students' specific strengths and needs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.	The results of special education evaluations are shared with me in ways that provide meaningful insights into students' educational needs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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- | | | | | | |
|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 10. The Individualized Education Program (IEP) process in the school involves general and special education teachers as equal partners in making recommendations. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. Students with disabilities in the school receive instruction and supplementary aids and services in general education classes to the maximum extent appropriate. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 12. Students receiving special education services in separate classes who take Standards of Learning (SOL) assessments receive instruction in the core curriculum. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. Special education teachers instructing students in taking SOL assessments receive text books for their students that are relevant to their grade levels. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 14. Special education teachers instructing students in taking SOL assessments receive teacher versions of text books for the grade level of all their students. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 15. My students' IEPs include goals and objectives that are aligned with the general education curriculum. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 16. The special education/related services, accommodations, and/or modifications identified in my students' IEPs are provided as written. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 17. There is a consistent approach to progress monitoring in this school—there is a schedule and methods/tools for monitoring the progress of students receiving special education services. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 18. The school's report card (or other progress report) effectively communicates the progress of students with disabilities. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

B. Communication and Support

Strongly **Agree** **Disagree** **Strongly** **Don't Know**

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- | | | | | | | |
|-----|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. | There is sufficient communication between general education and special education staff about the needs and progress of students receiving special education services. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. | There is sufficient communication between general education and related services staff (OT, PT, Speech/Language, etc.) about the needs and progress of students receiving services. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. | Adequate time is available for general and special education teachers to collaborate in planning and delivering instruction to students. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. | General and special education teachers follow established standards for co-teaching or collaborative instruction. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. | General education teachers are provided with sufficient information and support for helping the students with disabilities in their classrooms. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. | I receive the support I need from the administration when facing challenges related to teaching or serving students with disabilities. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. | Paraprofessionals are effectively assigned in order to support the learning and progress of students with disabilities. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. | Paraprofessionals are effectively utilized to support the learning and progress of students with disabilities. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. | The training sessions I attended have been helpful to me in supporting the learning of students with disabilities. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. | The school district provides effective transition services for: | | | | | |
| | a. From Preschool to Kindergarten | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | b. From Elementary School to Middle School | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | c. From Middle School to High School | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- d. Planning for transition to post-secondary education, employment, independent living, and community living options

Strongly Agree **Agree** **Disagree** **Strongly Disagree** **Don't Know**

C. Communication with Parents and Parent Involvement

1. Parents are given the opportunity to participate as partners during meetings to discuss their child's educational needs.
2. Parents are encouraged to participate in making decisions about their children's educational programs and services.
3. The school effectively responds to the needs and concerns of parents of children with disabilities.

D. Challenge to Special Education Services and the Progress of Students with Disabilities in Your School

- | | Strongly Agree | Agree | Disagree | Strongly Disagree | Don't Know |
|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. Teachers in this school do not have high enough expectations for students with disabilities. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Teachers in this school have too high expectations for students with disabilities. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. General and special education teachers don't have sufficient time to collaborate with each other. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Progress monitoring for students with disabilities is not being implemented consistently. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. General and special education teachers need a toolkit of progress monitoring tools and training in how to use them. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Our school needs more guidance in the selection and use of intensive reading interventions for students reading below grade level. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Our school needs more guidance in the use of positive behavior supports for students with behavioral issues. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- | | | | | | |
|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 8. General education teachers need more focused professional development on special education and teaching students with disabilities. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. General education teachers need more focused professional development on differentiating instruction. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Paraprofessional teaching assistants need more focused professional development on providing instructional interventions to students. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. Paraprofessional teaching assistants need more focused professional development on providing positive interventions to students. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 12. Our school needs guidance and support on implementing a more systematic IAT process at the elementary level and a broader array of interventions before students are referred to special education at the middle and high school levels. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. There is insufficient communication and collaboration among general and special education teachers and parents to help special education students make an effective transition into our school. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

14. Please identify areas in which you would like professional development.

- | | |
|--|--|
| <input type="checkbox"/> Differentiated instruction | <input type="checkbox"/> Transition Planning |
| <input type="checkbox"/> General education interventions | <input type="checkbox"/> -Supporting positive behavior |
| <input type="checkbox"/> Co-teaching and inclusion | <input type="checkbox"/> Progress Monitoring |
| <input type="checkbox"/> Other: | <input type="checkbox"/> Social Skills |

Section 3 — Conflict Resolution

- | | Yes | No | N/A |
|---|--------------------------|--------------------------|--------------------------|
| 4. Have there been disagreements between the parents and the school in the planning and placement process regarding the educational programs provided to the students with disabilities that you work with? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. If yes, please indicate any of the following that reflect your involvement/experience: | | | |

	Yes	No	N/A
a. APS representatives treated families with respect.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. APS representatives treated me with respect.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. I was satisfied with how the district or school attempted to resolve the disagreements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Conflicts were efficiently and effectively resolved.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section 2 — Your Experiences with IAT Services

Please use the following Rating Scale to indicate your level of agreement with the items described in this survey. *Your rating should best reflect your experiences with Section 504 services and students with Section 504 plans in your school.*

Strongly Agree: This is *almost always true*.
Agree: This is *true most of the time*.
Disagree: This is *not true most of the time*.
Strongly Disagree: This is *almost never true*.
Don't Know: *I don't know*.

	Strongly Agree	Agree	Disagree	Strongly Disagree	Don't Know
A. IAT/Related Services & Processes					
1. I am familiar with the academic intervention services and behavior intervention services at my school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Overall, I believe that my school delivers highly effective academic intervention services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Overall, I believe that my school delivers highly effective positive behavior intervention services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Our school consistently follows well-defined and systematic process for implementing the IAT process.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Our school implements highly effective reading intervention services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Our school implements highly effective math intervention services.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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- | | | | | | | |
|-----|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 7. | Students unable to read grade level text are routinely provided differentiated instruction for the core curriculum. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. | There is a consistent approach to progress monitoring in this school—there is a schedule and methods/tools for monitoring the progress of students receiving IAT services. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. | At least every two weeks, school staff use data to discuss progress of students involved in the IAT process. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. | Academic assessment data is used to determine the type of interventions student need. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

B. Communication and Support

- | | | | | | | |
|-----|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 11. | There is sufficient communication between teachers of students involved in the IAT process regarding their needs and progress. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 12. | Adequate time is available for general and IAT personnel to collaborate in planning and delivering instruction to students. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. | I receive the support I need from the administration when facing challenges related to teaching of students involved with the IAT process. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 14. | The training sessions I attended have been helpful to me in supporting the learning of students with involved in the IAT process. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

C. Communication with Parents and Parent Involvement

- | | | | | | | |
|----|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. | Parents are encouraged to participate as partners during meetings to discuss their children’s educational needs. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. | Parents are respected, equal partners in making decisions about their children’s educational programs and services. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. | The school effectively responds to the needs and concerns of parents involved with the IAT process. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

D. Barriers to IAT Services and the Progress of Students with Disabilities in Your School

- | | | | | | |
|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. Teachers in this school do not have high expectations for students involved with the IAT process. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. General education teachers don't have sufficient time to collaborate with each other. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Progress monitoring for students receiving interventions is not being implemented consistently. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. General education teachers need a toolkit of progress monitoring tools and training in how to use them. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Our school needs more guidance in the selection and use of intensive reading interventions for students reading below grade level. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Our school needs more guidance in the selection and use of intensive math interventions for students performing below grade level. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Our school needs more guidance in the use of positive behavior supports for students with behavioral issues. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. General education teachers need more focused professional development on the IAT process. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. General education teachers need more focused professional development on differentiating instruction. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Our school needs guidance and support on implementing a more systematic IAT process at the elementary level and a broader array of interventions before students are referred to IAT at the middle and high school levels. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. There is insufficient communication and collaboration among general and IAT teachers and parents to help IAT students make an effective transition into our school. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

12. Please identify areas in which you would like professional development.

- Differentiated instruction
- Using data for decision-making
- General education interventions
- Supporting positive behavior
- Progress Monitoring
- Problem solving
- Other:

Section 3 — Conflict Resolution

	Yes	No	Don't Know
6. Have there been disagreements between the parents and the school in the planning and placement process regarding the educational programs provided to the students with disabilities that you work with?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. If yes, please indicate any of the following that reflect your involvement/experience:			
e. APS representatives treated families with respect.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. APS representatives treated me with respect.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. I was satisfied with how the district or school attempted to resolve the disagreements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section 2 — Your Experiences with Section 504 Supports

Please use the following Rating Scale to indicate your level of agreement with the items described in this survey. Your rating should best reflect your experiences with Section 504 supports and students with Section 504 plans in your school.

- Strongly Agree:** This is *almost always true.*
- Agree:** This is *true most of the time.*
- Disagree:** This is *not true most of the time.*
- Strongly Disagree:** This is *almost never true.*
- Don't Know:** *I don't know.*

Strongly Agree Agree Disagree Strongly Disagree Don't Know

A. Section 504 Services and Processes

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- 1. Overall, I believe that my school delivers highly effective education supports for students with Section 504 in my school.

- 2. Our school consistently follows a well-defined and systematic process for implementing interventions (when appropriate) prior to referral for a Section 504 evaluation/supports.

- 3. The evaluations conducted through the Section 504 process are sufficiently comprehensive to identify students' specific strengths and needs

- 4. The results of Section 504 evaluations are shared with me in ways that provide meaningful insights into students' educational needs.

- 5. The Section 504 process in the school involves parents and school personnel as partners in making recommendations.

- 6. The services and/or accommodations, in my students' Section 504 plan are provided consistently as written.

B. Communication and Support

- 15. There is sufficient communication between teachers, nurses and other personnel to implement Section 504 plans.

- 16. General education teachers are provided with sufficient information and support for helping the students with Section 504 plans in their classrooms.

- 17. I receive the support I need from the administration when facing challenges related to teaching or serving students with Section 504 plans.

- 18. The district provides useful professional development related to meeting the needs of students with Section 504 plans.

- 19. The training sessions I attended have been helpful to me in supporting the learning of students with Section 504 plans.

C. Communication with Parents and Parent Involvement

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- | | | | | | |
|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 4. Parents are given the opportunity to participate as partners during meetings to discuss their children’s educational needs. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Parents are encouraged to participate in making decisions about their children’s educational programs and supports. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

D. Barriers to Section 504 Supports and the Progress of Students with Section 504 Plans in Your School

- | | | | | | |
|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. Personnel don’t have sufficient time to collaborate with each other. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. General education teachers need more focused professional development on Section 504. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. There is insufficient communication and collaboration among school personnel and parents to help students with Section 504 plans make an effective transition into our school. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

4. Please identify areas in which you would like professional development.

- | | |
|---|---|
| <input type="checkbox"/> Section 504 child find | <input type="checkbox"/> Section 504 accommodations/modifications |
| <input type="checkbox"/> Section 504 evaluations | <input type="checkbox"/> Section 504 in general |
| <input type="checkbox"/> Section 504 plan development | <input type="checkbox"/> Other |

Section 3 — Conflict Resolution

- | | Yes | No | Don’t Know |
|--|--------------------------|--------------------------|--------------------------|
| 8. Have there been disagreements between the parents and the school in the planning process regarding services provided to the students with Section 504 plans that you work with? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. If yes, please indicate any of the following that reflect your involvement/experience: | | | |
| h. APS representatives treated families with respect. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| i. APS representatives treated me with respect. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| j. I was satisfied with how the district or school attempted to resolve the disagreements. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Appendix J: Case Study Documents

Case Study Probes

During a meeting with representatives of Arlington Public Schools (APS) on February 15, 2012, it was decided that PCG will meet with school-based representatives to review a sample of case studies. Through this method, staff members would be available for either an hour or half-day session. Three PCG facilitators will each lead three different school-based groups each day (AM and PM) over three full days. A PCG note taker would also participate in every session. Through this method, PCG will be able to gather rich, qualitative data to improve documentation related to assessments, eligibility determination, service development, and progress monitoring; and make recommendations, including those designed to improve instruction.

The matrix provided below identifies specific questions related to the review of each case study; the questions are tailored to various student subgroups. Please note that PCG deleted a few after the meeting on 2/15 due to concerns that the sessions would be too long. In addition, there are specific sessions slated only for an hour to address smaller groups of students. To ensure that the questions are relevant-for each subgroup-some questions apply to only some subgroups. If focus groups are unable to complete all records assigned, PCG will complete the review for any such case studies addressing those questions that rely on documentation in the student file.

PCG requests that APS representatives review the questions and suggest changes deemed appropriate. The cells containing an “x” are probes to be asked of the group when reviewing the specified record.

Case Study Probes	LD	OHI	ID	ED	Autism	Speech	Exited	Not Eligible	504	Health Plan	Termination	* Alternative
IEPs, 504s & HEALTH PLANS												
1. Referral, Assessment & Eligibility (*Will not be an area of concentration for students with the “Alternative” designation. These are students in the following programs Functional Living Skills Program, Career Center, MIP-A, Asperger’s Program, Interlude, and 45 day Alternative Program).												
1a. Interventions/progress monitoring data? Implemented with fidelity?	X	X	X	X	X	X	X	X				
1b. Were any district (human/document) resources utilized for assessing/addressing student’s needs?	X	X	X	X	X	X	X	X	X		X	
1c. Comprehensive evaluation summary?	X	X	X	X	X	X	X	X	X		X	
1d. Other data not considered?	X	X	X	X	X	X	X	X	X		X	
1e. Consideration of student’s race, ethnicity or culture?	X	X	X	X	X	X	X	X	X		X	
1f. Other information considered?	X	X	X	X	X	X	X	X	X	X	X	

Case Study Probes	LD	OHI	ID	ED	Autism	Speech	Exited	Not Eligible	504	Health Plan	Termination	* Alternative
1g. Sufficient consideration of health impairment & any academic impact?	X	X	X	X	X	X	X	X		X		
1h. For students 14 years/above, student given assessment inventories?		X			X			X				
1i. ADHD: Evaluation data to suggest an OHI or other disability or 504 eligibility?		X							X	X		
1j. IEP: Was/is there consideration of 504 or IAT before eligibility?	X	X	X	X	X	X						
1k. 504 Plan: Any suspicion of IDEA eligibility?									X			
1l. Health Plan: Any suspicion of 504 or IDEA eligibility?										X		
1m. Termination: Sufficient information showing student no longer eligible?											X	
1n. Termination: Performance OK/considered? Need for general ed interventions/supports? Was the student considered for a 504?											X	
1o. If ELL: Student's language proficiency/impact on learning considered?	X	X	X	X	X	X	X	X	X	X	X	
1p. If ELL: Assessment conducted in student's native language?	X	X	X	X	X	X	X	X	X	X	X	
1q. If ELL: Language acquisition considered for eligibility?	X	X	X	X	X	X	X	X	X	X	X	
1r. If ELL: Evidence ESOL/HILT checklist & Bridges manual used?	X	X	X	X	X	X	X	X	X		X	
2. Planning & Communication												
2a. **Present levels of performance comprehensive & useful?	X	X	X	X	X	X						X
2b. **Goals/objectives measurable; reasonably rigorous and achievable?	X	X	X	X	X	X						X
2c. ** IEP address student's needs? Identified services/supports for student to progress all needed areas?	X	X	X	X	X	X						X
2d. Assistive technology considered & used?	X	X	X	X	X	X			X			X
2e. How much time/percent student in general ed setting?	X	X	X	X	X	X						X
2f. Student receives maximum appropriate instruction in gen ed?	X	X	X	X	X	X						X
2g. Staff/paraprofessionals knowledgeable about student needs?	X	X	X	X	X	X			X	X		X
2h. Ways plan could be improved?	X	X	X	X	X	X			X	X		X
2i. Plan communicated to all who need to know?	X	X	X	X	X	X			X	X		X
2j. What is level of parent communication &	X	X	X	X	X	X			X	X		X

Case Study Probes	LD	OHI	ID	ED	Autism	Speech	Exited	Not Eligible	504	Health Plan	Termination	* Alternative
involvement?												
2k. Strategies used to communicate any relevant health issue/student supports in classroom?		X							X	X		X
2l. Transition from grade or school: How was the transition?	X	X	X	X	X	X			X	X		X
2m. Related Service Provider: Provider communication with teacher(s)?	X	X	X	X	X	X			X	X		X
2n. Students ≥14 yrs: Goals discussed with student/parents for post secondary options?	X	X	X	X	X	X						X
2o. Students ≥14 yrs: Transition plan developed & used?	X	X	X	X	X	X						X
2p. Students ≥14 yrs: Consent given & public agency reps invited?	X	X	X	X	X	X						X
2q. Students ≥14 yrs: Strategies for student involvement in IEP process?	X	X	X	X	X	X						X
2r. ED/Behavior: Support positive behavior & social/emotional growth? (others to check if behavior?)				X								
2s. Autism: Autism coordinator consulted or involved in IEP process? (or invited) Broader question should address: Was there sufficient expertise at the table (involved with the case) that fit the student/case needs (either in person on documentation to support) examples included psychologist for ED, etc.					X							
3. Student Progress												
3a. **Is instruction being differentiated? As applicable to the student/case	X	X	X	X	X	X			X			X
3b. Are all services implemented?	X	X	X	X	X	X			X			X
3c. Student making progress? What evidence? Sufficient progress?	X	X	X	X	X	X			X	X		X
3d. Suspensions? Change in placement? Procedural safeguards followed?	X	X	X	X	X	X			X			X
3e. Parent is ELL: How was student's progress shared with parents? Translation?	X	X	X	X	X	X			X	X		X
4. Procedural Safeguards												
4a. Were events timely? (evaluation, IEP, 504 plan)	X	X	X	X	X	X			X			X
4b. Timely notice/consent? (assessment, meeting invitations, actions taken/denied, placement, etc.?)	X	X	X	X	X	X			X			X
4c. ** Required person(s) at meeting, including related services personnel?	X	X	X	X	X	X	X	X	X		X	X

Case Study Probes	LD	OHI	ID	ED	Autism	Speech	Exited	Not Eligible	504	Health Plan	Termination	* Alternative
4d. If ELL: Person knowledgeable of the student's language needs?	X	X	X	X	X	X	X	X	X	X	X	X
5. Other relevant information - lessons learned & future needs? (e.g., professional development)												
IAT PROCESS												
1i. Referral												
1ia. Any evidence to suspect 504 or IDEA?												
1iab. If ELL: Consideration of student's language proficiency/impact on learning?												
1iac. If ELL: Language acquisition considered when determining appropriateness of interventions/progress monitoring?												
1iad. If ELL: ESOL/HILT checklist & Bridges manual consulted?												
2i. Planning & Communication												
2ia. Written plan comprehensive & reflects student needs?												
2ib. Measurable goals?												
2ic. Ways plan could be improved?												
2id. Plan communicated to staff?												
2ie. Plan communicated to parents?												
2if. Transition from grade or school: How was transition? IAT process communicated?												
2ig. If ELL: Were student's language needs addressed?												
3i. Student Progress												
3ia. Interventions/progress monitoring data? Fidelity?												
3ib. Staff implementing plan?												
3ic. Data show progress? Sufficient?												
3id. IAT plan modified at regular intervals?												
3ie. Suspensions? If so, what was the pattern? (needs to go beyond suspensions to include detentions, in and out of school suspensions, attendance as a potential proxy for discipline.												
3if. Student progress shared with parents?												
3ig. If Parent is ELL: How was information communicated?												
4i. Procedural Considerations												
4ia. **Appropriate person(s) at meeting?												
4ib. Did the parent participate in the meeting?												
4ic. Timely implementation?												
4id. If ELL: Person knowledgeable of the student's language needs at meeting?												
5i. Other relevant information - any additional action to be taken?												

** Consider the language needs of the student if (s)he is ELL and of parent who is ELL.

Case Study Participant Instructions

Instructions for Participants in the Case Study Sessions

Thank you for agreeing to help us as we study and identify ways to improve APS practices for students identified with special needs. The discussion is a professional development opportunity, as well as a chance for you to help shape future improvements to APS practices and procedures.

During your session, you will participate in a small group discussion about APS practices and procedures using a small number of cases similar to the case you represent. An external facilitator will guide your group through a number of cases from several schools. Based on the collective feedback from the case study review, together you will identify what worked well and where APS should adjust its practices and procedures to improve how we serve students with special needs.

Thirty-one different review groups will follow the same process, while looking at different types of student records.

Please note that this is NOT an audit of the record(s) you represent and you will NOT be asked to defend decisions that were made. The evaluation office has already copied standard pages from the student file that will be red-acted and copied for other small group participants. During the session, you may be asked to review details in the students' cumulative file which could potentially inform the group about decisions making for the case.

For the session, you need to bring the cumulative file for the records assigned to you.

Below are more details about this Case Study process.

Background information. The Arlington Public Schools (APS) hired an independent consulting firm, Public Consulting Group, Inc. (PCG), to conduct a comprehensive evaluation of the services provided to students with special needs. This includes students who have or have had an Intervention Assistance Team plan (IATs), Health Plan, Section 504 plan or an Individualized Education Program (IEPs). The goal of the evaluation is to improve the services for students and their families.

In June 2012, PCG will be on-site in Arlington for three days to conduct case study sessions with staff and teachers. A total of 148 student records will be reviewed including: 68 general education IEPs, 35 IEPs from students in special programs, 22 IATs, 17 504 plans and six health plans. The sessions will be led by PCG facilitators and include a range of staff and teachers. Staff members will be asked to participate based on the student records selected. All answers will be kept confidential.

Selection of student records. Student records were selected based on a careful methodology laid out by PCG. APS central office staff selected the student records based on an un-biased methodology which ensures that there is a wide cross-section of student records to be reviewed. APS will gather relevant documents associated with the student including referral, eligibility, plans, attendance data, report cards and assessment data.¹⁵⁰

Participants in case study sessions. The sessions will be groups of about 8-10 participants. The groups are made up of staff that do and do not have direct knowledge of a particular student. Staff members

¹⁵⁰ The documentation may vary based on the student.

from each school will represent a certain student file to be reviewed. The student files will be provided to everyone in the group with the names redacted.

Format of the case study session. The case study sessions will review the documents relevant to the student under discussion and participants will respond to a series of thought-provoking questions about the material and decision-making process. PCG will document the discussions and analyze the information collected, identifying any trends or patterns that become evident. The results and themes of the case study sessions will appear in the evaluation report.

For each student record to be reviewed, PCG facilitators will go through the following process:

1. The participants will take 3-5 minutes to review the documentation associated with the student.
2. PCG facilitators will ask a series of questions of the group, both with direct and indirect knowledge of the student. The discussion will focus on five key areas (where applicable):
 - a. Referral, Assessment and Eligibility
 - b. Planning and Communication
 - c. Student Progress
 - d. Procedural Safeguards/Considerations
 - e. Other relevant information

For more information on the case studies, please contact Lisa Stengle, Office of Evaluation and Planning (703) 228 8663.

Thank you for your participation.

Data and Documents to Gather for Case Study Sessions

During a meeting with representatives of Arlington Public Schools (APS) on February 15, 2012, it was decided that PCG will meet with school-based representatives to review a sample of case studies. Through this method, staff members would be available for either an hour or half-day session. Three PCG facilitators will each lead three different school-based groups each day (AM and PM) over three full days. A PCG note taker would also participate in every session. Through this method, PCG will be able to gather rich, qualitative data to improve documentation related to assessments, eligibility determination, service development, and progress monitoring; and make recommendations, including those designed to improve instruction. The matrix provided below identifies specific data files and documents that would be reviewed for each case study session.

	LD	OHI	ID	ED	Autism	Speech	Not Eligible IDEA	Exited IDEA	504	Not Eligible 504	Exited 504	Health Plan	IAT
Referral documentation for IEP evaluation/IAT/504	X	X	X	X	X	X	X	X	X	X	X	X	X
Latest evaluation summary & eligibility determination summary	X	X	X	X	X	X	X	X	X	X	X	X	X
Intervention data &/or progress monitoring reports &/or IEP Updates or any other periodic review information	X	X	X	X	X	X	X	X		X	X		X
504/Health Care Annual Review									X			X	
2011-2012 IEP Updates	X	X	X	X	X	X		X					
Current IEP	X	X	X	X	X	X		X					
Current 504 plan									X		X		
Current or last IAT plan & revisions													X
Current Health Plan – Located in the Nurses Office												X	
Attendance – To be pulled by central office	X	X	X	X	X	X	X	X	X	X	X	X	X
2011-2012 Report Card – To be pulled by central office	X	X	X	X	X	X	X	X	X	X	X	X	X
State & Local assessment data (SOL, DRP, Stanford, Math – yellow card)	X	X	X	X	X	X	X	X	X	X	X	X	X
Out of School Suspension data - To be pulled by central office	X	X	X	X	X	X	X	X	X	X	X	X	X

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In-school suspension - To be pulled by central office	X	X	X	X	X	X	X	X	X	X	X	X	X
Discipline Folder	X	X	X	X	X	X	X	X	X	X	X	X	X
Manifestation Determinations, Functional Behavior Assessment/Behavior Intervention Plan	X	X	X	X	X	X	X	X	X	X	X		X
14 years & Above: transition assessment inventories & transition plan	X	X	X	X	X								
ELL: Language Service Registration Center (LSRC) information, WIDA Scores, Pink Card, ESOL/HILT Checklist & Secondary Portfolios	X	X	X	X	X	X	X	X	X	X	X	X	X

Methodology for File Selection

68 IEPs: Resource & Cross Categorical

To select schools/files, begin by entering schools into one of the scheduled sessions for elementary, middle and high school. May schedule schools based on convenience; if this is not a factor, may schedule according to alphabetical order or schools.

Elementary: 22 Elementary Schools: 2 files/school

44 Elementary School files: 10 LD (EL), 7 OHI (1 EL), 4 ED (1 EL), 4 ID, 4 S/L (1 EL), 3 Autism (1 EL), 2 Interlude (Oakridge), 2 Deaf/Hearing (Henry), 4 not found eligible (1 EL) & 4 exited from services

5. Day 1 AM (refers to current school year): Facilitator 1

- School 1. First student reevaluated (LD) & first student identified (OHI)
- School 2. First student initial evaluation (ID) & first student identified (ED)
- School 3. Last student found not eligible for special education; first student any evaluation (autism)

6. Day 1 PM: Facilitator 1

- School 1. First student initial evaluation (S/L) & first student any evaluation (LD)
- School 2. First student initial evaluation (OHI) & last student found not eligible for special education
- School 3. First student exited from services; first student any evaluation (ED)

7. Day 2 AM: Facilitator 1

- School 1. First student initial evaluation (LD) & first student reevaluated (OHI)
- School 2. First student initial evaluation (ID) & last student exited from services
- School 3. Last student any evaluation (autism); first student eligible (S/L)

8. Day 2 PM: Facilitator 1

- School 1. First student reevaluation (S/L) & first student initial evaluation (OHI)
- School 2. First student initial evaluation (LD) & first student found not eligible for special education
- School 3. Last student exited from services; first student any evaluation (LD)

9. Day 3 AM: Facilitator 1

- School 1. First student initial evaluation (LD) & first student any evaluation (OHI)
- School 2. First student initial evaluation (ID) & last student exited from services
- School 3. Last student any evaluation (autism); first student initial evaluation (LD)

10. Day 3 PM: Facilitator 1

- School 1. First student reevaluation (S/L) & last student initial evaluation (OHI)
- School 2. First student initial evaluation (LD) & last student found not eligible for sp. education
- School 3. Last student initial evaluation (ED); first student any evaluation (LD)

11. Day 1 AM: Facilitator 2

- School 1. First student any evaluation (ID) & last student any evaluation (OHI)
- School 2. Last student initial evaluation (LD) & first student any evaluation (ED)
- Henry. First student any evaluation (deaf); last student any evaluation (deaf)

- Oakridge. Last student any evaluation (Interlude); first student any evaluation (Interlude)

6 Middle Schools: 2 files/school

12 Middle School files: 3 LD, 2 OHI, 1 ED, 1 ID, & 1 autism, 2 Not eligible and 2 exited from services

PCG's Recommended dual SPED/ELL records: Any two records

12. Day 1 AM: Facilitator 3

- School 1. First student reevaluation (autism) & last student not eligible for special education
- School 2. Last student any evaluation (LD) & first student found not eligible for special education
- School 3. Last student exited from services; first student any evaluation (LD)

13. Day 1 PM: Facilitator 3

- School 1. First student initial evaluation (LD) & first student any evaluation (OHI)
- School 2. First student reevaluation (ID) & last student exited from services
- School 3. Last student any evaluation (autism); first student initial evaluation (ED)

4 High Schools: 3 files/school

12 High School files: 3 LD, 2 OHI, 1 ED, 1 ID, 1 autism, 2 not eligible and 2 exited from services

PCG's Recommended dual SPED/ELL records: Any two records

14. Day 1 PM: Facilitator 2

- School 1. First student reeval (autism); last student not eligible for sped; & last reeval (ED)
- School 2. Last student any eval (LD); first student any eval (OHI) & last student exited

15. Day 2 AM: Facilitator 2

- School 1. First student any eval (LD); first student any eval (OHI); last student exited
- School 2. First student reevaluation (ID); first student found not eligible for sped; & last student any evaluation (LD)

If no student with initial evaluation in given area, look for reevaluation in same area.

If one school does not have a student with given characteristics, substitute for another in the next

ELL: Beginning with first school, select a student who is ELL for the given characteristics, moving on to the next school(s) if none are available.

Begin with the first school to identify one student with ELL meeting characteristics until there is a sufficient number identified.

12 Functional Living Skills Program & Career Center

Subgroup 1.

- Glebe: Select first student with IEP completed this year
- Ashlawn: Select last student with IEP completed this year
- 1 MS: Select student in 6th grade with last IEP completed this year

Subgroup 2

- MS 2: Select student in 6th grade with first IEP completed this year
- MS 3: Select student in 7th grade with first IEP completed this year
- MS 4: Select student in 8th grade with first IEP completed this year
- MS 5: Select student in 7th grade with last IEP completed this year
- MS 6: Select student in 8th grade with last IEP completed this year

Subgroup 3

- Yorktown: Select first IEP completed this year
- Washington-Lee: Select last IEP completed this year
- Wakefield: Select first IEP completed this year
- EBCE Program: Select last IEP completed this year

* Include 2 students with ELL from two schools if such students are in these programs.

13 MIP-A & Asperger's Program

Subgroup 1. Elementary Schools

- Taylor: Select first IEP completed this year
- Hoffman-Boston: Select last IEP completed this year
- Jamestown: Select first IEP completed this year
- Abingdon: Select last IEP completed this year
- Drew: Select first IEP completed this year

Subgroup 2. Middle Schools

- Stratford: Select first IEP completed this year
- Kenmore: Select last IEP completed this year
- HB Woodlawn: Select first IEP (Asperger's) completed this year
- Jefferson: Select last IEP (Asperger's) completed this year

Subgroup 3. High Schools

- Stratford: Select first IEP completed this year
- Wakefield: Select last IEP completed this year
- HB Woodlawn: Select first IEP (Asperger's) completed this year
- Countywide: Select last IEP (Asperger's) completed this year

* Include 2 students with ELL from two schools if such students are in these programs.

11 Interlude (MS/HS) & 45-Day Alternative Program

Subgroup 1. 6 Interlude Middle Schools (by alphabetical order)

- School 1: First IEP completed (Grade 6)
- School 2: Last IEP completed (Grade 7)
- School 3: First IEP completed (Grade 8)
- School 4: Last IEP completed (Grade 6)
- School 5: First IEP completed (Grade 7)
- School 6: Last IEP completed (Grade 8)

Subgroup 2. 5 Interlude High Schools

- HS 1: First IEP completed (9th grade)
- HS 2: Last IEP completed (10th grade)
- HS 3: First IEP completed (11th grade)
- HS 4: Last IEP completed (12th grade)
- Langston IAES: Last IEP completed

* Include 2 students with ELL from two schools if such students are in these programs.

22 IATs (1 hour sessions with groups of schools attending each session)

12 Elementary Schools: Alphabetize elementary schools and select every other school and assign three to each subgroup.

- Subgroup 1: 4 Elementary Schools – 1st two schools with IAT for behavior; 2nd two schools for academics
- Subgroup 2: 4 Elementary Schools – 1st two schools with IAT for behavior; 2nd two schools for academics
- Subgroup 3: 4 Elementary Schools – 1st two schools with IAT for behavior; 2nd two schools for academics

* Include 2 students who are ELL: 1 504 plan; and either not eligible or health plan.

Middle and High Schools:

Subgroup 1: 3 Middle Schools – 1st school with IAT for behavior; 2nd for academics; 3rd for behavior

Subgroup 2: 3 Middle Schools – 1st school with IAT for academics; 2nd for behavior; 3rd for academics

Subgroup 3: 4 High Schools – 1st two schools with IAT for behavior; 2nd two schools for academics

* Include 2 students who are ELL: 1 504 plan; and either not eligible or health plan.

For each subgroup, identify one file for each school. Select a file for the student at each school receiving IAT services for the longest period of time during the current school year. If more than one student meets this criteria, select the student with a last name that starts first in the alphabet.

A student who is receiving IAT services for academics and behavior may meet either criteria above. If a school does not have a student with the specific criteria specified (e.g., academics), select a student receiving services for the other criteria (e.g., behavior).

22 504 & Health Plans (1 hour sessions with groups of schools attending each session)

12 Elementary Schools:

Select each elementary school that was not identified for a case study for IATs above. Assign each school to a subgroup.

- Of the 12 elementary schools, identify 3 students (from different schools) who were most recently found not to be eligible for 504 services.
- Of the remaining 9 schools, identify 2 students (from different schools) who exited from 504 services most recently.
- Of the remaining 7 schools, identify 1 student from each school with 1st 504 eligibility/plan developed this school year.
- Remaining 3 schools: Identify 3 students (from different schools) with health plans that were developed most recently.

Subgroup 1: 1 504 plan; 1 not eligible for 504 services; 1 health plan; and 1 exited services

Subgroup 2: 1 504 plan; 1 not eligible for 504 services; 1 health plan; 1 exited services

Subgroup 3: 2 504 plans; 1 not eligible for 504 services; 1 health plan

* Include 2 students who are ELL: 1 504 plan; and either not eligible or health plan.

6 Middle Schools

- Of the 6 middle schools, identify 1 student most recently found not to be eligible for 504 services.
- Of the remaining 5 schools, identify 1 student who exited from 504 services most recently.
- Of the remaining 4 schools, identify 1 student from each school with 1st 504 eligibility/plan developed this school year.
- Of the remaining 1 school: identify 1 student with health plan developed most recently.

Subgroup 1: 1 student with 504 plan; 1 student not eligible for 504 services; & 1 student exited from 504

Subgroup 2: 1 student with 504 plan; 1 student exited from 504 services; & 1 student with health plan

4 High Schools

- Of the 4 high schools, identify 1 student most recently found not eligible for 504 services
- Of the remaining 3 schools, identify 1 student at each school with most recent 504 eligibility/plan developed
- Of the remaining 1 school, identify 1 student with most recently developed health plan

Subgroup 3: 2 students with 504 plan; 1 student not eligible for 504; & 1 student with health plan

* Include 2 students with ELL from two middle/high schools.

Appendix K: 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 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

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

2. 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.)
3. 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.
4. 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.

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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 L: Distribution of Students by Demographic Characteristics

Table 1. 2010–11, Distribution of Students by Demographic Characteristics Arlington Public Schools, VA									
	2010–11 Enrolled Students								
	All Students	General Ed Students		IEP Students		IAT Students		504 Students	
	N	#	%	#	%	#	%	#	%
PK–Grade 12+	21,231	17,190	81%	3,385	16%	518	2%	138	1%
Gender									
Female	10,289	8,929	87%	1,084	11%	216	2%	60	1%
Male	10,942	8,261	76%	2,301	21%	302	3%	78	1%
Ethnicity									
White	9,533	8,032	84%	1,237	13%	164	2%	100	1%
Hispanic	6,109	4,588	75%	1,293	21%	205	3%	23	<1%
Black or African American	2,469	1,840	75%	530	22%	92	4%	--	<1%
Asian	2,071	1,853	90%	175	9%	37	2%	--	<1%
Multi	987	830	84%	139	14%	16	2%	--	<1%
Race Other	62	47	76%	11	18%	--	6%	--	---
Economically Disadvantaged									
Yes	6,947	5,281	76%	1,406	20%	245	4%	15	<1%
No	14,284	11,909	83%	1,979	14%	273	2%	123	1%
LEP Status									
Non-LEP	14,864	12,158	82%	2,266	15%	312	2%	128	1%
LEP, receiving services	4,701	3,809	81%	720	15%	163	4%	--	<1%
LEP, declined services	830	539	65%	268	32%	23	3%	--	<1%
Former LEP	836	684	82%	131	16%	20	2%	--	<1%
Gifted									
Non-Gifted	17,100	13,344	78%	3,177	19%	475	3%	104	1%
Specific Academic Aptitude only	2,557	2,413	94%	111	4%	19	1%	14	1%
Visual/Performing Arts only	847	744	88%	75	9%	16	2%	12	1%
Specific Academic Aptitude & Visual/ Performing Arts	718	681	95%	21	3%	8	1%	8	1%
Gifted Other	9	8	89%	--	11%	--	--	--	--

The original numbers were based on semi-annually assigning students to IEP, 504, IAT or general education using information from the SPED error file, the 504 file, the IAT file and the EOY file. These assignments did not necessarily agree with the numbers seen when we updated the tables using the EOY disability code as the primary determinant. When the tables were updated, there were students previously indicated as IAT or as general education who were reassigned to IEP because they have disability codes indicated. Similar changes happened when we reassigned anyone with a 504 disability code to the 504 category.

Appendix M: Urban Special Education Leadership Collaborative Survey Results¹⁵¹

	Total Enrollment	Incidence		Sp Educator			Paraeducator			Speech/Lang			Psychologist		
		% SpEd	SpEd Enr	Number	Ratio To:		Number	Ratio To:		Number	Ratio To:		Number	Ratio To:	
					SpEd	All		SpEd	All		SpEd	All		SpEd	All
Agawam Public Schools	4,347	15%	656	39	17	112	100	7	44	15	44	290	3	219	1449
Atlanta Public Schools	43,443	11%	4,950	431	11	101	224	22	194	65	76	688	22	225	1975
Arlington VA Pub Sch	21231	13.9%	2952	343	8.6	62	262	11	81	38	77	574	23	128	923
Austin Pub S D	84676	10%	8,062	772.5	10.4	110	824	9.7	103	70.5	114	1201	4.6	233	2447
Baltimore City PublSch	82,824	16%	12,866	1,121	12	74	620	21	134	92	140	901	12	NA	NA
Boston Public Schools	54,966	21%	11,534	1200	10	47	800	14	70	147	78	383	48	240	1173
Bridgeport, CT	20,300	14.3%	2,618	204	13	100	254	10	80	25	105	812	33	79	615
Cambridge Publ Schools	6,000	20%	1,200	176	7	35	103	12	59	20	60	300	22	55	273
Carpentersville	19,844	15.8%	3,139	227	13.8	87	380	8.3	52	43	73	461	28	112	708
Chicago Pub Sch	404,151	12%	50,566**	3,753	13.5	108	3,479	14.5	145	374	135	1081	224	223	1796
Clark Cty School Dist	309,476	10%	32,167	2,247	15	138	1,346	24	230	299	108	1036	180	179	1720
Cleve Hts-UnivHtsCty	6,000	18%	1,100	83	14	73	58	19	104	7	158	858	8	NA	NA
D.C. Public Schools	48,991	18%	8,603	669	13	74	653	14	76	90	96	545	78	111	629
Davenport CommSch	15,302	12%	1,857	188	10	82	287	7	54	NA	NA	NA	NA	NA	NA
Deer Valley Unified SD	36,086	9%	3,289	190	18	190	229	15	158	49	68	737	108	31	335
Denver Public Schools	78,352	12%	9,142	592	16	133	528	18	149	94	98	834	98	94	800
ESD 112	13,764	14%	1,987	55	37	251	158	13	88	20	100	689	12	166	1147
Elgin U-46, IL	40,531	14%	5,658	273	21	148	277	20	146	72	78.6	563	20	283	2027
Everett Public Schools	6,100	17%	1,049	74	15	83	51	21	178	4	263	1525	5	210	1220
Fort Worth	79,885	8%	6,144	520	12	154	450	14	178	73	85	1095	31	199	2577
Houston Indepen SD	200,568	9%	17,489	1,625	11	124	1,145	16	176	158	111	1270	NA	NA	NA
Kalamazoo Pub Schools	12,100	14%	1,667	70	24	173	79	22	154	15	112	807	NA	NA	NA
Kyrene School District	17,910	9%	1,544	141	11	128	124	13	145	27	58	664	14	111	1280
Lakota Local	18,500	10%	1,800	126	15	147	120	15	155	39	47	475	18	100	1021
LAUSD	632,881	13%	82,326	4,470	19	142	8,470	10	75	379	218	1670	599	138	1057
Lincoln	1,060	12%	128	21	7	51	21	7	51	5	26	212	2	64	530
Marlborough Pub Sch	4,835	25%	1,198	141	9	35	115	11	43	7	172	691	4	300	1209
Memphis City	110,863	15%	16,637	912	19	122	655	26	170	53	314	2092	58	287	1912
Miami-Dade	376,264	11%	40,012	2,500	17	151	1,226	33	307	209	192	1801	206	195	1827
Montgomery CtySch	146,812	12%	17,226	1,588	11	93	1,398	13	106	293	59	502	97	178	1514
Naperville IL 203	88,131	11%	1978	150	13	120	237	8	76	33	59	549	22	90	824
New Bedford	12,692	21%	2,655	204	14	63	205	13	62	26	103	489	9	295	1411
Oak Park SchDist 97	5,400	16%	875	78	12	70	90	10	60	14	63	386	8	110	675
Pittsburgh Pub Schools	28,000	18%	5,096	359	14	78	252	20	110	40	127	700	16	319	1749
Portland Public Schools	46,596	14%	6,513	355	19	132	535	13	88	92	71	507	56	117	833
Providence	23,695	18.8%	4,460	340	13	70	339	13	70	40	111	592	28	159	846
Rockford IL Pub S	28,973	14%	4,065	336	12	86	334	12	87	49	83	591	24	169	1207
Round Rock	43,000	8%	3,313	369	9	117	171	20	252	41	81	1049	29	115	1483
San Diego Unified SD	132,500	12%	16,300	1,100	15	121	1,300	13	102	196	84	677	129	NA	NA
Saugus, MA	3,012	15%	462	28	17	108	29	16	104	6	77	502	NA	NA	NA
SchDist of Philadelphia	168,181	20%	33,686	1,535	22	110	610	56	276	99	341	1699	100	337	1682
Scottsdale, AZ	26,544	10.9%	2,891	246	11.8	108	230	12.6	115	39.4	73	674	28.4	102	935
St. Paul	38,086	18.8%	7,152	523	13.7	73	536	13.3	71	97	74	392	19	376	2004
Sun Prairie Area S Dist	6,656	10%	697	62	12	108	93	8	72	14	50	476	7	100	951
Tacoma Pub Schl WA	3,894	12%	32412	172.5	23	188	223	17	145	33.6	116	965	27	144	1200
Tucson Unified SD	56,000	14%	8,092	409	20	137	419	20	134	61	133	919	54	150	1038
Washoe County ScDist	63,310	14%	8,551	472	19	135	325	27	195	77	112	823	37	232	1712
Williamson CtySchl	31,292	9%	2,824	213	13	147	400	7	78	34	121	911	23	178	1346
West Aurora, IL SD	12,725	13%	1688	120	14	106	101	17	126	21	80	606	13	130	979
Worcester	24,825	21%	5,172	254	21	98	366	15	68	38	137	654	NA	NA	NA
Averages		12.3			15	110		16	120		109	794		173	1263

¹⁵¹ Information for this survey was supplemented by data collected by the Council of the Great City Schools.

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Evaluation of APS Services for Students with Special Needs

January 2013

Ratios for Social Workers, Nurses, OTs & PTs	Total Student Enrollment	Total Special Ed	Social Worker			Nursing			Occupational Therapy		Physical Therapy	
			Number	Ratio To:		Number	Ratio To:		Number	Ratio SpEd	Number	Ratio SpEd
				SpEd	All		SpEd	All				
Agawam Pub Schools	4,347	656	0	NA	NA	8	82	544	3	219	3	219
Atlanta Public Schools	43,443	4,950	30	165	1448	58	85	511	12	413	3	1650
Arlington Pub Schools	21231	2952	16	186	1327	*30	98	708	20	147	6	492
Austin Pub S D	84,676	8,062	21	384	4032	68	119	1245	19	424	13	620
Baltimore City Public	82,824	12,866	193	67	430	78	165	1062	20	644	5	2574
Boston Public Schools	54,966	11534	6	NA	NA	100	115	563	67	172	17	680
Bridgeport, CT	20,300	2618	38	69	534	28	94	82	7	374	2	1309
Cambridge Pub School	6,000	1,200	16	75	375	0	NA	NA	16	75	7	172
Carpentersville	19,844	3,139	36.5	86	544	27.5	114	722	22	142	6	523
Chicago Pub Sch	404,151	50,566	355	142	1138	326	155	1240	106	477	33	1532
Clark Cty School Dist	309,476	32,167	26	NA	NA	173	186	1789	68	474	29	1100
Cleve Hts-UnivHtsCty	6,000	1,100	7	158	858	5	220	1200	2	550	1	1100
D.C. Public Schools	48,991	8,603	90	96	545	127	68	386	48	180	16	538
Davenport CommSch	15,302	1,857	NA	NA	NA	7	266	2186	NA	NA	NA	NA
Deer Valley Unified SD	36,086	3,289	0	NA	NA	37	89	976	19	174	4	823
Denver Public Schools	78,352	9,142	74	124	1059	77	119	1018	25	366	12	762
Elgin U-46, IL	40,531	5,658	50	113	810	76	74	533	22	257	4	1414
ESD 112	13,764	1,987	0	NA	NA	5	398	2753	6	332	3	663
Everett Public Schools	6,100	1,049	2	525	3050	11	96	555	2	525	3	350
Fort Worth	79,885	6,144	2	NA	NA	106	58	754	16	384	10	615
Houston Indepen SD	200,568	17,489	26	673	7715	25	700	8020	17	1029	8	2187
Kalamazoo Pub	12,100	1,667	5	334	2420	2	834	6050	4	417	3	556
Kyrene School District	17,910	1,544	0	NA	NA	4	386	4478	2	772	2	772
Lakota Local	18,500	1,800	6	300	3084	14	129	1322	8	225	2	900
LAUSD	632,881	82,326	275	300	2302	575	144	1101	159	518	28	2941
Lincoln	1,060	128	5	26	212	2	64	530	2	64	1	128
Marlborough Public	4,835	1,198	9	134	538	10	120	484	4	300	2	599
Memphis City	110,863	16,637	55	303	2016	68	245	1641	11	1513	9	1849
Miami-Dade	376,264	40,012	35	NA	NA	206	195	1827	65	616	23	1740
Montgomery CtySch	146,812	17,226	14	NA	NA	NA	NA	NA	112	154	61	283
Naperville, IL 203	88,131	1978	27	73	671	29	68	625	4	494	3	659
New Bedford	12,692	2,655	67	40	190	30	89	424	11	242	3	885
Oak Park SchDist 97	5,400	875	12	73	450	8	110	675	7	1125	1	875
Pittsburgh Pub Sch	28,000	5,096	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Portland Pub Schools	46,596	6,513	10	652	4660	0	NA	NA	20	326	9	724
Providence	23,695	4460	35	127	677	0	NA	NA	11.5	388	4.5	991
Rockford IL Pub S	28,973	4,065	26	135	1114	32	127	905	12.5	325	4.5	903
Round Rock	43,000	3,313	0	NA	NA	1	NA	NA	10	332	3	1105
San Diego Unified SD	132,500	16,300	3	NA	NA	129	127	1028	40	408	10	1630
Saugus, MA	3,012	462	4	116	753	5	93	603	2	231	1	462
SchlDist of Philadelphia	168,181	33,686	31	NA	NA	280	121	601	20	1685	20	1685
Scottsdale	26,544	2,891	3.5	NA	NA	31	93	856	13.8	210	3.8	761
St. Paul Pub Schools	38,086	7,152	92	78	414	33	217	1154	36	199	12	596
Sun Prairie Area S Dist	6,656	697	8	88	832	1	NA	NA	5	140	2	349
Tacoma Pub Sch (WA)	3,894	32412	0	NA	NA	1.2	NA	NA	19	205	11	354
Tucson Unified SD	56,000	8,092	26	312	2154	53	153	1057	10	810	4	2023
Washoe CtyScDist	63,310	8,551	0	NA	NA	35	248	1836	12	713	7	1222
West Aurora SD, IL	12,725	1688	19	89	670	7	241	1818	11	154	7	241
Williamson Cty Schl	30,942	4,093	4	NA	7736	37	111	837	22	187	5	819
Worcester	24,825	5,172	0	NA	NA	0	NA	NA	12	431	5	1035
Averages				187	1713		180	1449		438		969

* Nursing services provided by outside public agency.

FINAL REPORT

Evaluation of APS Services for Students with Special Needs

January 2013

**Percent Students with Disabilities of Total Enrollment and
Students with Disabilities to Staff Ratio in Ascending Order**

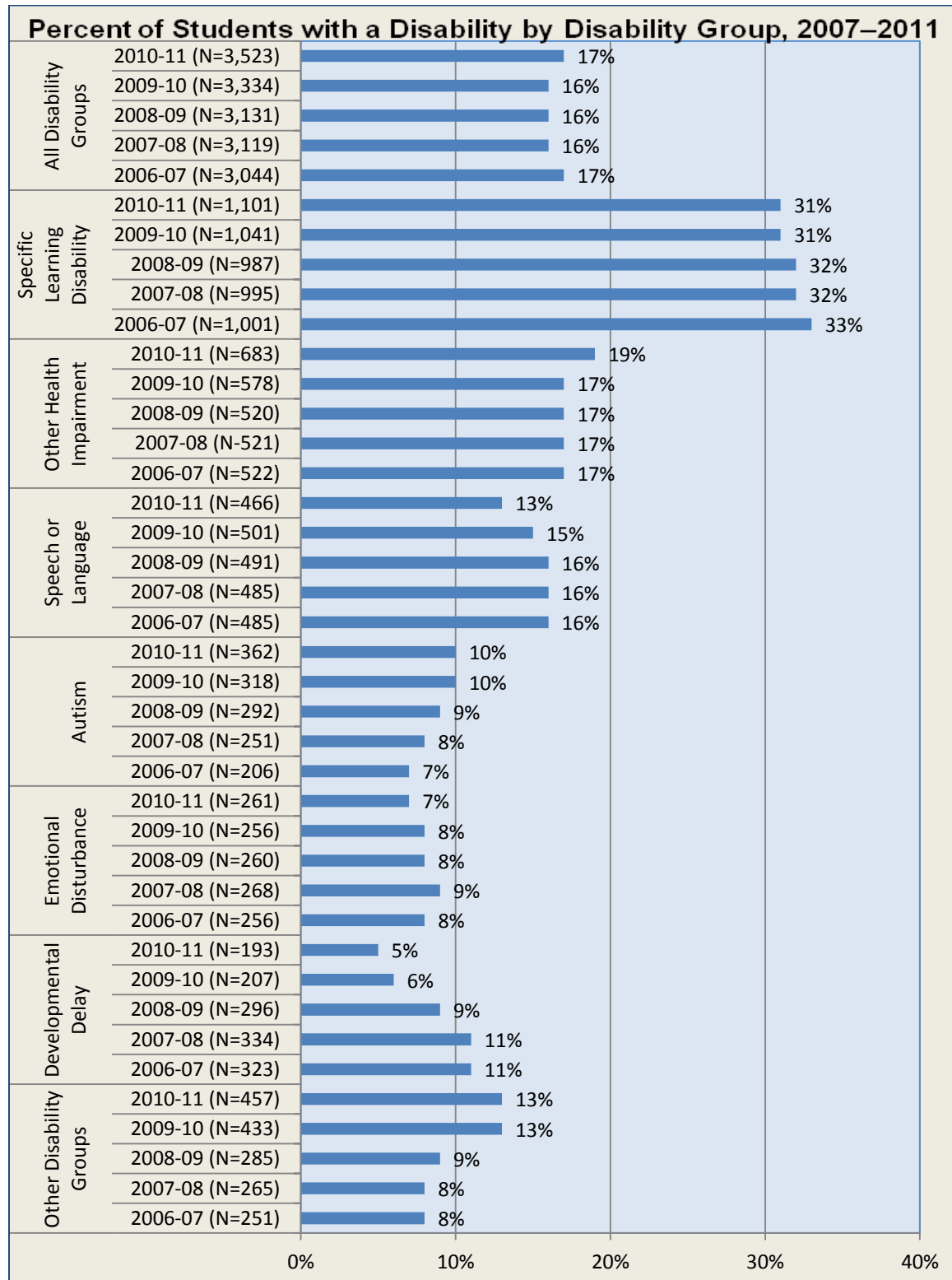
Rank	% IEPs	Special Educators	Paraprofessionals	Speech/Lang Pathologists	Psychologists	Social Workers	Nurses	Occupational Therapists	Physical Therapists
1	8%	7	7	26	31	26	58	64	128
2	8%	7	7	44	55	40	64	75	172
3	9%	8.6	7	47	64	67	68	140	219
4	9%	9	7	50	79	69	68	142	241
5	9%	9	8	58	90	73	74	147	283
6	9%	10	8	59	94	73	82	154	349
7	10%	10	8.3	59	100	75	85	154	350
8	10%	10	9.7	60	100	78	89	172	354
9	10%	11	10	63	102	86	89	174	462
10	10%	11	10	68	110	88	93	180	492
11	11%	11	10	71	111	89	93	187	523
12	11%	11	11	73	111	96	94	199	538
13	11%	12	11	73	112	113	96	205	556
14	11%	12	12	74	115	116	98	210	596
15	12%	12	12	76	117	124	110	219	599
16	12%	12	12.6	77	128	127	111	225	615
17	12%	12	13	78	128	134	114	231	620
18	12%	12	13	78.6	130	135	115	242	659
19	12%	13	13	80	138	142	119	257	663
20	12%	13	13	80	144	158	119	300	680
21	12%	13	13	81	150	165	120	325	724
22	13%	13	13	83	159	186	121	326	761
23	13%	13	13	84	166	300	127	332	762
24	13.9%	14	13.3	85	169	300	127	332	772
25	14%	14	14	96	178	303	129	366	819
26	14%	14	14	98	178	312	144	374	823
27	14%	14	14	100	179	334	153	384	875
28	14%	14	14.5	103	195	384	155	388	885
29	14%	14	15	105	199	525	165	408	900
30	14%	14	15	108	210	652	186	413	903
31	14%	15	15	111	219	673	195	417	991
32	14%	15	16	111	223		217	424	1035
33	15%	15	16	112	225		220	431	1100
34	15%	15	17	112	232		241	474	1100
35	15%	16	17	114	233		245	477	1105
36	16%	17	18	116	240		248	494	1222
37	16%	17	19	121	287		266	518	1309
38	16%	17	20	127	295		386	525	1414
39	17%	18	20	133	300		398	550	1532
40	18%	19	20	135	319		700	616	1630
41	18%	19	20	137	337		834	644	1650
42	18%	19	21	140	376			713	1685
43	19%	19	21	158				772	1740
44	19%	20	22	172				810	1849
45	20%	21	22	192				1029	2023
46	20%	21	24	218				1125	2187
47	21%	22	26	263				1513	2574
48	21%	23	27	314				1685	2941
49	21%	24	33	341					
50	25%	37	56						
Avg.	12.3%	15	16	109	173	195	180	438	969

Note: each column restarts a new ranking and therefore the schools are not aligned across rows. APS is differentiated by the bold red text

Appendix N: Distribution of Students by Primary Disability

Table 4. 2010–11, Distribution of Students by Primary Disability Arlington Public Schools, VA									
	2010–11 Enrolled Students								
	All Students	General Ed Students		IEP Students		IAT Students		504 Students	
	N	#	%	#	%	#	%	#	%
PK–Grade 12+	21,231	17,190	81%	3,385	16%	518	2%	138	1%
Students with a Disability				3,385	100%				
Autism				362	11%				
Developmental delay				193	6%				
Emotional disturbance				261	8%				
Hearing impairment				48	1%				
Intellectual Disabilities				112	3%				
Multiple disabilities				112	3%				
Other health impairment				683	20%				
Orthopedic impairment				22	1%				
Specific learning disability				1,101	33%				
Speech or language				466	14%				
Traumatic brain injury				11	<1%				
Visual impairment				14	<1%				

Appendix O: Percent of Students with a Disability by Disability Group Over Past 5 Years



Appendix P: Distribution of Students by Disability and Race/Ethnicity

2010–11: Distribution of Students by Ethnicity															
	2010-11 Enrolled Students														
	All Students	Asian American		Black or African American		Hispanic		White		American Indian/Alaska Native		Native Hawaiian/Other Pacific Islander		Multi	
PK–Grade 12+	21,231	2,071	10%	2,469	12%	6,109	29%	9,533	45%	47	<1%	15	<1%	987	5%
Students without a Disability	17,708	1,890	11%	1,932	11%	4,793	27%	8,196	46%	39	<1%	12	<1%	846	5%
Students with a Disability	3,523	181	5%	537	15%	1,316	37%	1,337	38%	8	<1%	--	<1%	141	4%
504 Qualified	138	--	3%	--	1%	23	2%	100	7%	--	--	--	--	--	1%
Autism	362	25	14%	35	7%	94	7%	191	14%	--	--	--	--	17	12%
Developmental delay	193	12	7%	16	3%	79	6%	76	6%	--	--	--	--	10	7%
Emotional disturbance	261	9	5%	59	11%	105	8%	78	6%	--	--	--	--	10	7%
Hearing impairment	48	9	5%	--	1%	24	2%	8	1%	--	--	--	--	--	1%
Intellectual Disabilities	112	9	5%	20	4%	51	4%	29	2%	--	--	--	--	--	2%
Multiple disabilities	112	12	7%	10	2%	29	2%	56	4%	--	--	--	--	--	4%
Other health Impairment	683	27	15%	136	25%	171	13%	314	23%	--	38%	--	0%	29	21%
Orthopedic impairment	22	--	1%		0%	--	1%	14	1%	--	--	--	--	--	--
Specific learning Disability	1,101	45	25%	208	39%	540	41%	267	20%	--	50%	--	--	37	26%
Speech or language	466	26	14%	39	7%	181	14%	193	14%	--	<1%	--	--	26	18%
Traumatic brain injury	11			--	0%	--	0%	--	0%	--	--	--	--	--	--
Visual impairment	14					9	1%	--	0%	--	--	--	--	--	--

Appendix Q: Distribution of Students with Special Needs by School

Table 2. 2010–11, Distribution of Students by School Arlington Public Schools, VA									
	2010–11 Enrolled Students								
	All Students	General Ed Students		IEP Students		IAT Students		504 Students	
	N	#	%	#	%	#	%	#	%
PK–Grade 12+	21,231	17,190	81%	3,385	16%	518	2%	138	1%
Elementary School	11,510	9,249	80%	1,871	16%	344	3%	46	<1%
Abingdon Elementary	489	368	75%	95	19%	25	5%	--	<1%
Arlington Science Focus School	540	479	89%	48	9%	13	2%	--	--
Arlington Traditional	454	360	79%	93	20%	--	--	--	<1%
Ashlawn Elementary	430	342	80%	72	17%	14	3%	--	<1%
Barcroft Elementary	437	337	77%	77	18%	21	5%	--	<1%
Barrett Elementary	554	388	70%	143	26%	23	4%	--	--
Campbell Elementary	403	336	83%	66	16%	--	<1%	--	--
Carlin Springs Elementary	581	468	81%	99	17%	12	2%	--	<1%
Claremont Immersion	526	418	79%	76	14%	29	6%	--	1%
Drew Model Elementary	570	492	86%	63	11%	15	3%	--	--
Francis Scott Key Elementary	665	546	82%	94	14%	25	4%	--	--
Glebe Elementary	466	390	84%	73	16%	--	--	--	1%
Henry Elementary	350	257	73%	76	22%	14	4%	--	1%
Hoffman-Boston Elementary	426	322	76%	81	19%	23	5%	--	--
Jamestown Elementary	582	499	86%	55	9%	27	5%	--	<1%
Long Branch Elementary	554	385	69%	144	26%	20	4%	--	1%
McKinley Elementary	494	404	82%	79	16%	--	1%	--	1%
Nottingham Elementary	592	504	85%	67	11%	15	3%	--	1%
Oakridge Elementary	617	515	83%	81	13%	20	3%	--	<1%
Randolph Elementary	454	324	71%	124	27%	--	1%	--	--
Taylor Elementary	683	588	86%	75	11%	17	2%	--	<1%
Tuckahoe Elementary	643	527	82%	90	14%	17	3%	9	1%
Middle School	4,094	3,364	82%	643	16%	58	1%	29	1%
Gunston Middle	754	634	84%	98	13%	20	3%	--	<1%
Jefferson Middle	648	498	77%	137	21%	7	1%	--	1%
Kenmore Middle	749	561	75%	173	23%	14	2%	--	<1%
Swanson Middle	948	809	85%	119	13%	9	1%	11	1%
Williamsburg Middle	995	862	87%	116	12%	8	1%	9	1%
High School	5,481	4,516	82%	789	14%	114	2%	62	1%
Wakefield High	1,521	1,224	81%	268	18%	18	1%	11	1%
Washington-Lee High	2,069	1,724	83%	244	12%	71	3%	30	1%
Yorktown High	1,891	1,568	83%	277	15%	25	1%	21	1%
Other Programs/Contract Services	146	61	42%	82	56%	--	1%	--	1%

Other Programs/Contract Services was defined by the school codes 0623, 8000, 9000, and 9998.

Appendix R: Distribution of Students with Special Needs by Grade Level

Table 3. 2010–11, Distribution of Students with a Disability Arlington Public Schools, VA									
	2010–11 Enrolled Students								
	All Students	General Ed Students		IEP Students		IAT Students		504 Students	
	N	#	%	#	%	#	%	#	%
PK–Grade 12+	21,231	17,190	81%	3,385	16%	518	2%	138	1%
Elementary School	11,510	9,249	80%	1,871	16%	344	3%	46	<1%
PK	1,120	736	66%	358	32%	26	2%	--	--
KG	1,978	1,702	86%	219	11%	53	3%	--	<1%
Grade 1	1,923	1,614	84%	247	13%	58	3%	--	<1%
Grade 2	1,739	1,410	81%	253	15%	71	4%	--	<1%
Grade 3	1,652	1,304	79%	273	17%	65	4%	10	1%
Grade 4	1,636	1,312	80%	273	17%	41	3%	10	1%
Grade 5	1,462	1,171	80%	248	17%	30	2%	13	1%
Middle School	4,094	3,364	82%	643	16%	58	1%	29	1%
Grade 6	1,412	1,156	82%	221	16%	24	2%	11	1%
Grade 7	1,308	1,080	83%	204	16%	18	1%	--	<1%
Grade 8	1,374	1,128	82%	218	16%	16	1%	12	1%
High School	5,481	4,516	82%	789	14%	114	2%	62	1%
Grade 9	1,420	1,166	82%	200	14%	40	3%	14	1%
Grade 10	1,357	1,139	84%	179	13%	28	2%	11	1%
Grade 11	1,346	1,108	82%	191	14%	31	2%	16	1%
Grade 12	1,358	1,103	81%	219	16%	15	1%	21	2%
Other Programs/Contract Services	146	61	42%	82	56%	--	1%	--	1%

Data provided by APS in the spreadsheets labeled: EOY 2011.xlsx and IAT 2010-11.xls. Other Programs/Contract Services was defined by the school codes 0623, 8000, 9000, and 9998

Appendix S: Number of Days Absent by Grade and Disability Type

010–11 Grades 9–12 Number of Days Absent											
2010–11 Active Students, Number of Days Absent											
	All Students	0, Not Recorded		1–5 Days		6–10 Days		11–15 Days		16 or more Days	
	N	#	%	#	%	#	%	#	%	#	%
Grades 9-12	5,481	463	8%	2,065	38%	1,269	23%	704	13%	980	18%
Students without a Disability or coded as 504 program	4,692	416	9%	1,856	40%	1,074	23%	601	13%	745	16%
Students with a Disability	789	47	6%	209	26%	195	25%	103	13%	235	30%
Autism	68	--	7%	29	43%	15	22%	9	13%	10	15%
Emotional Disturbance	92	--	5%	14	15%	16	17%	16	17%	41	45%
Multiple Disabilities	24	--	4%	--	17%	--	21%	--	17%	10	42%
Other Health Impairment	174	13	7%	55	32%	45	26%	14	8%	47	27%
Specific Learning Disability	365	16	4%	93	25%	95	26%	53	15%	108	30%
Other	66	--	11%	14	21%	19	29%	7	11%	19	29%

2010–11 Grades 6–8 Number of Days Absent

2010–11 Active Students, Number of Days Absent											
	All Students	0, Not Recorded		1–5 Days		6–10 Days		11–15 Days		16 or more Days	
	N	#	%	#	%	#	%	#	%	#	%
Grades 6–8	4,094	345	8%	1,953	48%	1,038	25%	453	11%	305	7%
Students without a Disability or coded as 504 program	3,451	300	9%	1,684	49%	886	26%	360	10%	221	6%
Students with a Disability	643	45	7%	269	42%	152	24%	93	14%	84	13%
Autism	53	--	4%	27	51%	13	25%	--	11%	--	9%
Emotional Disturbance	59	--	3%	22	37%	15	25%	--	2%	19	32%
Other Health Impairment	166	--	4%	85	51%	35	21%	20	12%	19	11%
Specific Learning Disability	292	26	9%	112	38%	70	24%	56	19%	28	10%
Other	73	8	11%	23	32%	19	26%	10	14%	13	18%

Note: students in the "Other" disability classification include Speech or Language, Hearing Impairment, Intellectual Disabilities, Orthopedic Impairment, Traumatic Brain Injury, and Visual Impairment.

2010–11 Grades PK–5 Number of Days Absent

2010–11 Active Students, Number of Days Absent											
	All Students	0, Not Recorded		1–5 Days		6–10 Days		11–15 Days		16 or more Days	
	N	#	%	#	%	#	%	#	%	#	%
Grades PK–5	11,510	820	7%	4,889	42%	3,242	28%	1,424	12%	1,135	10%
Students without a Disability or coded as 504 program	9,639	596	6%	4,220	44%	2,795	29%	1,154	12%	874	9%
Students with a Disability	1,871	224	12%	669	36%	447	24%	270	14%	261	14%
Autism	222	22	10%	71	32%	57	26%	44	20%	28	13%
Developmental Delay	193	41	21%	47	24%	36	19%	27	14%	42	22%
Emotional Disturbance	82	--	5%	38	46%	9	11%	8	10%	23	28%
Other Health Impairment	335	30	9%	136	41%	89	27%	49	15%	31	9%
Specific Learning Disability	430	20	5%	183	43%	118	27%	62	14%	47	11%
Speech or Language	436	96	22%	149	34%	94	22%	56	13%	41	9%
Other	173	11	6%	45	26%	44	25%	24	14%	49	28%

2010–11 Other Programs/Contract Services Students Number of Days Absent											
2010–11 Active Students, Number of Days Absent											
	All Students	0, Not Recorded		1–5 Days		6–10 Days		11–15 Days		16 or more Days	
	N	#	%	#	%	#	%	#	%	#	%
Other Programs/Contract Services ¹⁵²	146	67	46%	18	12%	20	14%	18	12%	23	16%
Students without a Disability or coded as 504 program	64	--	6%	13	20%	16	25%	14	22%	17	27%
Students with a Disability	82	63	77%	--	6%	--	5%	--	5%	--	7%
Autism	19	19	100%	---	---	---	---	---	---	---	---
Emotional Disturbance	28	26	93%	---	---	--	7%	---	---	---	---
Specific Learning Disability	14	---	---	--	21%	--	7%	--	29%	--	43%
Other	21	18	86%	--	10%	--	5%	---	---	---	---

Note: students in the “Other” disability classification include Speech or Language, Hearing Impairment, Intellectual Disabilities, Orthopedic Impairment, Traumatic Brain Injury, and Visual Impairment.

¹⁵² Other Programs/Contract Services was defined by the school codes 0623, 8000, 9000, and 9998.

Appendix T. Additional IAT Procedures

APS's procedures for Early Intervention for Students with Special Learning Needs: Intervention Assistance Teams (IAT) are provided in the Procedures for Implementing Regulations Governing Special Education Programs for Children with Disabilities in Arlington, VA. in Appendix V. This Appendix includes:

- Overview and Purpose
- Team Process
- Parent Letter
- Intervention Plan Form

In addition, the PCG team was provided with a document entitled "Seven Critical Components of the IAT Process: Strategies that Work (Seven Critical IAT Components)", which was developed in the spring and fall of 2010 by IAT Committee Chairs. The strategies are provided for the following areas: culturally responsive practices, teacher support, reading and specific programs/activities, classroom behavior management, parent engagement, monitoring of student progress, and accountability for plan implementation. Information from this document is used below to supplement the IAT procedures in relevant areas.

Referral

The IAT procedures describe the characteristics of students who may benefit from an IAT referral, such as students who are not benefitting from behavioral or academic interventions; students who are at risk of non-promotion or failure in two or more required subjects; students who are at risk of a Student Study Committee (SSC) referral; and students with frequent absences without a medical excuse; etc.

The procedures specify also that the IAT process should not be used to defer or delay the processing of a referral to the SSC. The IAT purpose section states that a student should be referred to the SSC when there is a belief that the student has a disability. Reportedly, professional development provided by Student Services specifically addresses the various patterns for referrals, focusing on those appropriate for an IAT, Student Study and Section 504 processes. IAT chairs are expected to share this information regularly with their staff.

Interventions

The APS IAT procedures manual describes the following purpose of the IAT:

The IAT recommends specific in-school program accommodations/modifications to attempt to overcome the barriers to learning, including but not limited to: modification of the curriculum, teaching strategies, teaching environments, or materials, and the use of support services, consultative services, and building based teams to meet the student's needs in the regular education classroom.

The Intervention Plan includes a section for Major Modification Categories-IAT Intervention that specifies the following nine modification categories: materials, presentation, cueing/feedback, management, instructional, content, task, grouping, and physical/environment. The recommendations refer to these modifications as "interventions."

PCG reviewed the following documents and survey results to complete the analysis of this section: IAT School Level Evaluation Summary, Intervention Assistance Teams-Seven Critical Components of the IAT

FINAL REPORT

Evaluation of APS Services for Students with Special Needs

January 2013

Process: Strategies that Work, Intervention Assistance Team Process, and Special Education Program Evaluation: Information Requested--School Level IAT: General Education Interventions. In this report, PCG explores Multi-Tiered System of Supports (MTSS) concepts in more depth to highlight potential changes APS could make.

The PCG team was given a list of APS's 10 progress monitoring tools used by APS: Math Quarterly Assessments; Beginning of Year Math Assessment (BOY); End of Year Math Assessment (EOY); Developmental Reading Assessments (DRA), (selected schools, grades, and student populations); Degrees of Reading Power (DRP), (grades 2, 4, 6, 8); Phonological Awareness Literacy Screening (PALS); ACCESS testing, ELL students; Standards of Learning Released Tests (variable use); IStation Reading Assessment (5 Title I Schools); and PALS Quick Checks (at the teacher's discretion).

Appendix U. IAT Surveys

PCG surveyed students, parents and staff about the IAT process. Note that not all survey participants responded to each survey question asked. In each table, the percentage for each response reflects the number of people who responded to a question, not the percentage based on the total number of participants. The number of responses varied slightly across the items.

IAT Staff

Of 2,952 staff members asked to take a survey of the IAT process, 990 (33.5%) responded. Of these respondents, 641 identified themselves as working with students having IAT plans. The IAT portion of the survey was designed to acquire their perceptions of the effectiveness of the IAT program. Relevant staff members were asked to complete the online survey by the APS central office, superintendent and school leadership.

In addition to background information on their position and the school population they served, the survey items focused on staff experiences with: 1) IAT processes; 2) staff communication and support within the school; 3) professional development; and 4) communication with parents and parent involvement. Staff members were also asked to identify areas that were a major barrier or obstacle to providing IAT services in their school. The figures show the percent of staff agreeing (i.e., checked either “Strongly Agree” or “Agree”). See Appendix I for a copy of the survey full staff survey.

Exhibit 2.5. Staff Perception of the IAT Process—Responses by Grade Level					
	Grade Level				
	All Grades (N=618)	PK-5 (N=332)	6-8 (N=103)	9-12+ (N=96)	>1 Grade (N=87) ¹⁵³
	% Agree	% Agree	% Agree	% Agree	% Agree
1. I am familiar with the academic intervention services and behavior intervention services at my school.	92%	93%	88%	89%	93%
2. Overall, I believe that my school delivers highly effective academic intervention services .	81%	86%	72%	68%	86%
3. Overall, I believe that my school delivers highly effective positive behavior intervention services .	70%	75%	56%	65%	70%
4. Our school consistently follows well-defined and systematic process for implementing the IAT process.	77%	83%	67%	72%	73%
5. Our school implements highly effective reading intervention services .	70%	84%	54%	36%	75%
6. Our school implements highly effective math intervention services .	64%	66%	75%	45%	66%
7. Students unable to read grade level text are routinely provided differentiated instruction for the core curriculum.	61%	75%	35%	40%	57%
8. There is a consistent approach to progress monitoring in this school- there is a schedule and methods/tools for monitoring the progress of students receiving IAT services.	57%	66%	42%	49%	53%
9. At least every two weeks , school staff use data to discuss progress of students involved in the IAT process.	27%	32%	20%	22%	24%
10. Academic assessment data is used to determine the type of interventions students need .	76%	82%	66%	66%	78%

¹⁵³ Anytime a column is classified as “More than One Grade” the staff member selected the option “All Grades PK-12” on the staff survey.

Exhibit 2.6. Staff Perception of Communication and Support in the IAT Process—Responses by Grade Level

	Grade Level				
	All Grades (N=618)	PK-5 (N=334)	6-8 (N=103)	9-12+ (N=94)	> One Grade (N=87)
	% Agree	% Agree	% Agree	% Agree	% Agree
1. There is sufficient communication between teachers of students involved in the IAT process regarding their needs and progress.	66%	72%	59%	51%	66%
2. Adequate time is available for general and IAT personnel to collaborate in planning and delivering instruction to students.	41%	40%	36%	40%	48%
3. I receive the support I need from the administration when facing challenges related to teaching of students involved with the IAT process.	66%	71%	59%	65%	57%
4. The training sessions I attended have been helpful to me in supporting the learning of students involved in the IAT process.	49%	56%	30%	39%	56%

Exhibit 2.7. Staff Perception of Barriers to IAT Services – Responses by Grade Level

	Grade Level				
	All Grades (N=612)	PK-5 (N=332)	6-8 (N=99)	9-12+ (N=94)	>1 Grade (N=87)
	% Agree	% Agree	% Agree	% Agree	% Agree
1. Teachers in school do not have high expectations for students involved with the IAT process.	9%	8%	13%	6%	13%
2. General education teachers don't have sufficient time to collaborate with each other.	54%	53%	52%	68%	48%
3. Progress monitoring for students receiving interventions not implemented consistently .	38%	33%	54%	40%	36%
4. General education teachers need a toolkit of progress monitoring tools and training in how to use them.	57%	54%	67%	62%	56%
5. Our school needs more guidance in the selection/use of intensive reading interventions for students reading below level.	36%	30%	51%	41%	34%
6. Our school needs more guidance in the selection/use of intensive math interventions for students performing below grade.	39%	39%	38%	33%	45%
7. Our school needs more guidance in the use of positive behavior supports for students with behavioral issues.	48%	43%	63%	46%	54%
8. General education teachers need more focused professional development on the IAT process.	42%	35%	64%	42%	48%
9. General education teachers need more focused professional development on differentiating instruction.	50%	45%	64%	48%	55%
10. Our school needs guidance/ support on implementing more systematic IAT process at the elementary level and a broader array of interventions before students are referred to IAT at the middle and high school levels .	30%	26%	51%	20%	36%
11. There is insufficient communication and collaboration among general and IAT teachers and parents to help IAT students make an effective transition into our school.	21%	17%	32%	18%	28%

Exhibit 2.8. Staff Perception of Communication with Parents and Parent Involvement in the IAT Process—Responses by Grade Level

	Grade Level				
	All Grades (N=603)	PK-5 (N=326)	6-8 (N=99)	9-12+ (N=92)	> 1 Grade (N=86)
	% Agree	% Agree	% Agree	% Agree	% Agree
1. Parents encouraged to participate as partners during meetings to discuss their children’s educational needs.	93%	94%	96%	88%	93%
2. Parents are respected, equal partners in making decisions about their children’s educational programs and services.	92%	92%	95%	90%	92%
3. The school effectively responds to the needs /concerns of parents in IAT process.	91%	93%	92%	86%	89%

Exhibit 2.9. Staff Professional Development Interests	
Responses for IAT Survey	% Responses
Differentiated Instruction	19%
General Education Interventions	21%
Progress Monitoring	22%
Use Data for Decision-making	11%
Support Positive Behavior	24%
Problem Solving	15%
Responses for Special Education Survey	% Responses
Differentiated Instruction	33%
General Education Interventions	31%
Support Positive Behavior	44%
Social Skills	33%

IAT Parent Survey Results

Due to low response rates from parents of students with IAT plans, PCG was unable to complete survey analysis in this area. Out of the 655 parents asked to participate in the survey, only 38 parents provided feedback, a 5.8% response rate. Based on conversations with the APS project team, parents seemed confused about the terminology used in a letter sent by APS alerting them to take a survey. We learned that schools have different names for the IAT Process and APS received numerous calls from parents wanting more information to identify if they should have taken the survey.

Student Survey

Methodology

A total of 68 APS high school students with IAT plans completed an online survey (a response rate of 61%) designed to acquire their perceptions of the effectiveness of the IAT program. While the survey period was extended to allow for additional responses to be captured, APS central office did a great job communicating to staff about the importance of having any high school student with an IAT plan take the survey and this resulted in a high response rate, even though not all survey participants responded to each survey question asked. When discussing the results for each response, the percentages reflect the number of people who responded to a question, not the percentage based on the total number of participants.

In addition to background information on their age, school, gender and grade, the survey items focused on student experiences and satisfaction with school and the IAT process. Students were also asked about different learning opportunities in which they might want to participate. See Appendix D for a copy of the survey.

Demographics of Student Survey

Exhibit 2.1 below reports the number and percentages of student responses by their age, gender and school. All secondary grades 9-12 and APS high schools were represented.

Exhibit 2.1. Survey of Students with IAT Plans		
	Responses	
	#	%
1. Age - Total Responses	68	
14 Years	9	13%
15 Years	16	24%
16 Years	15	22%
17 Years	21	31%
18-22 Years	--	10%
2. Gender		
Male	39	57%
Female	29	43%
3. Current School		
H-B Woodlawn Secondary Program	--	10%
Wakefield High School	14	21%
Washington-Lee High School	33	49%
Yorktown High School	12	18%
New Directions Program	--	3%
4. Current Grade Level		
9th	17	25%
10th	22	32%
11th	19	28%
12th	10	15%

Exhibit 2.2. Student Participation in the IAT Process			
	Grades 9–12+ (N=46)		
	Yes	No	Don't Know
1. Did APS staff explain to you why you needed an intervention or IAT services in a way that you were able to understand?	78%	12%	10%
2. Did someone from APS answer questions you have?	73%	16%	10%
3. Did you attend your most recent IAT meeting?	68%	28%	4%
4. Do you know what goals your IAT Plan expects you to achieve?	63%	19%	18%
5. Do you know what kind of interventions and support you are receiving because of your IAT Plan?	63%	24%	13%
6. Do you receive the services on your IAT Plan?	54%	18%	28%
7. If you feel you are not receiving the interventions or other supports that you are supposed to, do you ask someone for help?	60%	29%	10%
8. Do the interventions and supports you receive help you do better in school?	75%	12%	13%
9. Do you speak a language at home that is different from school?	53%	46%	1%

Exhibit 2.3. Student Satisfaction with the IAT Process	
	Grades 9–12+ (N=46)
	% Agree
1. I feel OK about asking questions about my IAT at meetings.	78%
2. My teachers talk with me about my progress in school.	88%
3. My teachers have high enough expectations for me.	90%
4. My teachers are giving me the help I need.	91%
5. Other students treat me fairly.	84%
6. I receive the help I need to do well in school.	87%
7. I do not need help with my behavior.	84%
8. I am welcomed, valued, and respected in school.	85%
9. My teachers understand me and support me.	85%
10. I am getting skills to help me be independent as possible after high school.	90%
11. I like school.	71%

Exhibit 2.4. Other Areas of Interest - Survey of Students with IAT Plans	
	# Responses
Homework and Study Strategies	39
Help with Positive Behavior	9
Organization Strategies	21
Other	--

Appendix V: Interventions

Elementary School Interventions

ELEMENTARY SCHOOL INTERVENTIONS	ASFS	Nottingham	Claremont	Drew	Campbell	Patrick Henry	ATS	Barrett	Mckinley	Hoffman Boston	Long Branch	Barcroft	Tuckahoe	Abingdon	Oakridge	Jamestown	Randolph	Key	Taylor	Ashlawn	Carlin Springs	Glebe	New Directions	TOTAL
Access to word processor/computer											1	1			1	1								4
Additional practice at home	1																							1
Advance notice of substitute													1											1
After school PALS tutoring															1									1
After school remediation																							1	1
After school support: 21st century learning grant & ELO or Greenbriar Learning Center																	1							1
After school tutoring									1			1	1	1	1						1			6
Agenda Checks		1	1			1														1				4
Allow students to redo work or tests																			1				1	2
Allowing a student to transition early/individually between classes			1																					1
Allowing for repeated readings of text			1																					1
Allowing students to discuss topics in their native language			1																					1
Alpha smart															1									1
Alphabet strip									1															1
Assignment notebook check	1								1		1	1	1											5
Attendance at intersession remediation/extension classes											1													1
Attendance Plans						1								1	1									3
Audio versions of textbooks																							1	1
Aurora House or Argus House tutoring																							1	1
Backpack checks											1	1	1	1					1					5
Bands for busy feet																						1		1
Before school chores																			1					1

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	ASFS	Nottingham	Claremont	Drew	Campbell	Patrick Henry	ATS	Barrett	McKinley	Hoffman Boston	Long Branch	Barcroft	Tuckahoe	Abingdon	Oakridge	Jamestown	Randolph	Key	Taylor	Ashlawn		Carlin Springs	Glebe	New Directions	
Before school math acceleration program															1										1
Behavior cue cards			1																						1
Behavior plans/charts	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	17	
Behavioral supports from psychologist and counseling team							1		1															2	
Blocking out already read text																			1					1	
Books on tape							1																	1	
Books on tape, earobics, reading recovery, individual literacy action plans				1	1		1	1											1	1	1	1		8	
Break down information into meaningful chunks			1	1				1							1	1			1					6	
Break opportunities		1						1				1								1		1		5	
Breaks during testing																1								1	
Bright Beginners Club						1																		1	
Bumpy seat								1																1	
Character Club									1															1	
Chew toys			1					1																2	
Child tape records written assignments										1														1	
Clarify instructions																1								1	
Class job								1							1									2	
Color-coded organizational systems for binders and notebooks			1																					1	
Community Book Buddies		1		1			1		1															4	
Completion of Elementary Checklist for ELLs (ESOL/HILT)		1		1	1										1		1	1		1				7	
Consider for Gifted Services											1		1											2	
Consult with Librarian															1									1	
Consult w/private provider									1															1	
Consultation w/school specialist																		1			1			2	
Cool down location identified	1			1																				2	
Cooperative Learning			1																					1	
Counseling Groups/ Individual check-ins		1	1	1	1				1	1	1			1		1	1	1	1	1				12	

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Decrease number of items on a page																1									1
Develop and implement reward/motivation system														1		1	1		1						4
Dictation of some homework/class assignments								1			1														2
Differentiating information			1		1																				2
Do the Math	1																			1				2	
Earobics		1																						1	
ESOL/HILT lead teacher to observe and make recommendations																	1							1	
ESOL/HILT services																		1						1	
Everybody Wins																		1						1	
Extended wait time and Prompting		1						1				1				1				1				5	
Extra set of textbooks provided at child's home										1				1										2	
FASTT math	1	1			1	1	1	1	1	1	1			1		1				1	1	1		15	
First language support																						1		1	
Food bank, clothes, school supplies																						1		1	
Friends Group Counselor								1																1	
Give lead time																			1					1	
Go Math						1																		1	
Graph paper			1																					1	
Graphic organizers for writing and reading guidance			1							1		1		1	1				1				1	7	
Handwriting without Tears		1																			1			2	
Head phones, earplugs																							1	1	
Hearing and vision screening																						1		1	
Home-School Communication Journals		1	1							1				1				1		1				6	
Homework chart/plan						1		1																2	
Homework Club		1	1			1	1		1	1	1									1		1		9	
Incentive Sticker Chart								1									1							2	
Inform student prior to calling on him/her													1											1	
Interdisciplinary																							1	1	

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meetings																									
Invite behavior specialist/school counselor to observe student				1		1		1																	3
Invite math coaches, literacy coaches to assist teachers and/or student				1																					1
iStation reading intervention												1													1
Keyboarding class											1														1
Lap buddy									1																1
Lunch buddy																		1							1
Lunch bunch reading intervention groups			1					1				1							1			1			5
Lunch friend group								1					1												2
Manipulative and other educational aides	1		1	1															1		1				5
Master schedule is designed for most academic classes to be in the morning																							1		1
Materials sent home to help with homework							1							1	1										3
Math boosters																			1						1
Medication Monitoring										1															1
Mentoring	1																								1
Modeling new concepts			1																						1
Modified Workloads	1		1						1		1	1	1			1	1	1	1	1	1				11
Morning literacy acceleration program														1											1
Movement Opportunities	1		1			1			1	1				1	1	1					1		1		10
Multi-sensory lesson plans			1																						1
My Reading Coach	1																					1			2
Newcomer group for English Language Learners												1													1
Noise buffers			1																						1
Observations and recommendations																		1							1
One-to-one instruction			1																						1
One-to-one with volunteer during lunch/recess																		1							1
Option of standing during			1																						1

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lessons																								
Organizational checklists			1		1	1								1					1					5
OT screening and recommendations for accommodations											1				1									2
OT screening and recommendations for accommodations											1													1
Parent support										1														1
Parents referred to Parent Resource Center						1																		1
Participation sticks			1																					1
Peace place in classroom						1																		1
Peer problem solving helper									1															1
Peer reading															1									1
Pencil grips, lined paper, fat pencils, etc															1				1					2
Permission to consult with Pediatrician																						1		1
Personal timer																						1		1
PESA for parents														1										1
Phonographics						1	1														1	1		4
Placement in Academic Achievement STAR																								
Preferential Seating	1		1		1	1			1			1		1	1			1	1	1			1	12
Previewing new information			1		1																			2
Project Family Referrals																						1		1
Project Yes								1																1
Provide visuals with text			1																					1
Provide written work in larger type size																1								1
Providing class notes or note taking template			1																					1
Providing warnings before transition			1																					1
Psychologist workshop on managing stress	1																							1
QRI Assessment/Intervention					1																			1
Quick Reads								1																1
Razz Kids web-based reading program											1													1
Read 180																							1	1

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Read aloud test																	1							1
Read Naturally	1					1	1		1		1	1								1		1		8
Reading buddy																	1							1
Reading into tape recorder and listening back for errors										1														1
Reading Recovery								1		1		1						1			1			5
Reading specialist												1	1	1										3
Reading support: Double dose from reading specialist	1	1			1						1													4
Reconvene in a second IAT to evaluate progress after interventions have been in place 4-6 weeks				1	1																			2
Redirecting student in the classroom																1								1
Reduction in homework						1																		1
Referral to behavior specialist										1				1	1									3
Referral to nurse																	1							1
Referrals to community agency					1	1		1		1					1						1	1		7
Referrals to private practice									1															1
Repeat directions												1												1
Scaffolding of information			1																					1
School Nurse support					1																			1
Sensory tools, fidgets, stress balls, etc.	1		1			1			1	1		1	1	1	1			1				1		11
Set goals and timelines with students and parents				1																				1
Short Crayons, writing instruments									1															1
Shortening assignments without compromising skill development																			1					1
Slant Board									1								1							2
Small class sizes																							1	1
Small group instruction																	1		1	1				3
Small Group PALS intervention											1													1
Small group testing																1								1
Small Group Tutorial	1		1				1	1			1				1									6

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Social skills counseling									1				1											2
Social Stories Counselor								1										1						2
Social Work support for attendance									1															1
Social work support for family needs									1							1								2
SOL materials available for students at risk																						1		1
SOL Prep: Before and after school remediation for Math and LA	1	1	1				1													1				5
Speech therapist to observe and make recommendations																1								1
Spell Read	1						1	1		1		1								1	1			7
SRA tutors																							1	1
Stoplight visual warning system			1																					1
Study carrels or Private work spaces			1					1	1													1		4
Summer school													1											1
Supplemental math services with teacher after school																		1						1
Support from ESOL/HILT teachers: writing & social studies in general ed																		1						1
Tallying marks tracking system			1																1					2
Teacher consultation use of tools from OT	1								1			1								1				4
Teacher meets with administrator to share concerns then sets up meetings with parent				1	1																			2
Timers used by teacher or parents							1		1		1			1		1			1					6
Tracking reading								1																1
Use computer for writing																	1							1
Use of electronic spelling devices/personal dictionaries	1						1																	2
Use of highlighter																1			1					2
Use of journaling																			1					1
Use of Regalia			1																					1
Use relaxation tech.																			1					1
Use of rocking chairs																			1					1
Use of Secret	1	1						1																4

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ELEMENTARY SCHOOL INTERVENTIONS																								
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Signals/Help Cards																								
Use of sit disc, carpet square to define personal space																			1					1
Use of supplemental reading programs available to gen ed students																			1					1
Use technology in class			1											1										2
Use think aloud strategies			1																					1
Verbal and non-verbal reminders/cues													1			1			1					3
Visual Schedules/Checklists		1	1			1			1	1					1									6
Visual timer															1									1
Visual trackers			1																					1
Visuals	1	1							1												1			4
Voyager Reading							1																	1
Weekly parent report						1																		1
Whole child approach					1																			1
Whole group think time behavior system			1																					1
Work Check-in, more frequent									1															1
Work Completion/Self-Regulation charts		1	1								1								1	1				5
Work w/ Math specialist										1														1
Work w/reading specialist									1	1								1	1	1				5
Working with a partner																			1					1
Working w/teacher during specials																		1						1
Worry beads in desk													1											1
Written praise									1															1
Yes Club										1								1				1		3
TOTAL	15	24	47	8	20	24	9	15	36	27	20	20	17	20	29	19	17	16	34	24	15	15	12	483

**Please note that the specific language for the interventions may differ between school, and assumptions may have been made on some listed items.

Middle School Interventions

MIDDLE SCHOOL INTERVENTIONS

	Swanson	Williamsburg	Jefferson	Gunston	Kenmore	TOTAL
Academic success sheets					1	1
Access to additional math and reading support		1				1
Access to word processor/computer				1		1
Additional support by teachers after school and at lunch				1		1
After school tutoring	1	1			1	3
Agenda Checks		1		1	1	3
Assignment notebook check	1		1			2
Assignment to 7pm program for work completion/tutoring					1	1
Behavior plans/charts		1	1			2
Behavior success sheets				1	1	2
Break down information into meaningful chunks		1				1
Break opportunities		1				1
Change of schedule		1	1			2
Consultation with school psychologist				1		1
Consultation with school social worker				1		1
Counseling Groups/Individual check-ins		1	1	1	1	4
Cueing for attention	1		1		1	3
Extended deadlines					1	1
Extended wait time and Prompting		1				1
Graphic organizers for writing and reading	1	1				2
Home-School Communication Journals		1			1	2
Homework Club		1	1			2
Inclusion classes available			1			1
Invite behavior specialist/school counselor to observe student			1			1
Locker checklist/organization		1		1		2
Math clinic			1			1
Math strategies			1			1
Mentoring			1			1
Modified Workloads	1			1	1	3
Organization TA			1			1
Parental check-ins				1		1
Peer tutor			1			1
Placement in Academic Achievement STAR	1					1

MIDDLE SCHOOL INTERVENTIONS

	Swanson	Williamsburg	Jefferson	Gunston	Kenmore	TOTAL
Point sheets			1			1
Preferential Seating	1	1	1		1	4
Progress reports posted online every 2 weeks			1			1
Providing class notes or note taking template		1				1
Putting students in specific organizational homerooms				1		1
Reading strategies			1			1
Recommendation to Strengthening Families Program	1					1
Reduction in homework	1					1
Referral to mental health therapist			1			1
Referrals to community agency		1				1
School Based Tutor			1			1
School Nurse support				1		1
Second math support class				1		1
Sensory tools, fidgets, stress balls, etc.		1				1
Set goals and timelines with students and parents			1			1
Small group instruction			1			1
Social work support for family needs			1			1
SOL Prep: Before and after school remediation for Math and LA			1			1
Students placed in reading and math support classes	1					1
Study guides			1			1
Study hall			1			1
Success plan		1				1
Teacher meets with administrator to share concerns; meets with parent				1		1
Use computer for written work	1					1
Visuals		1				1
Weekly progress report to parents	1		1			2
Work Check-in, more frequent		1				1
Work with minority achievement coordinator		1				1
TOTAL	12	21	26	14	11	84

****Please note that the specific language for the interventions may differ between school, and assumptions may have been made on some listed items.**

High School Interventions

HIGH SCHOOL INTERVENTIONS

	Langston	Washington-Lee	Arlington Mill	Wakefield	Yorktown	TOTAL
Academic Academy referral					1	1
Advanced story mapping			1			1
After school tutoring	1	1				2
Allow work to be turned in late				1		1
Alternate assessment					1	1
Alternative education program	1				1	2
Assessing prior knowledge, prior learning activation and recall			1			1
Attendance at intersession remediation/extension classes		1				1
Attendance Plans	1			1		2
Attendance/Behavior incentive			1			1
Back to school night	1					1
Behavior plans/charts	1			1		2
Break opportunities		1		1		2
Change of schedule		1		1	1	3
Classroom management plan	1					1
Classroom/teacher consultation	1					1
College visits & college representatives visit the school	1					1
Consult with home school attendance specialist	1					1
Counseling Groups/Individual check-ins		1				1
Crisis Intervention training	1					1
Cueing for attention					1	1
Daily progress report		1				1
Develop and implement reward/motivation system					1	1
Developing concept-specific word-list and vocab practice			1			1
DHS transition counselor referral	1					1
Disciplinary action		1				1
Drop class					1	1
Extended time on tests or assignments					1	1
Extended wait time and Prompting					1	1
Flexible deadline					1	1
Flexible scheduling			1			1
Graphic organizers for writing and reading			1			1
Guided writing practice			1			1
Hilt institute referral					1	1
Home visit		1				1

HIGH SCHOOL INTERVENTIONS

	Langston	Washington-Lee	Arlington Mill	Wakefield	Yorktown	TOTAL
IAT training	1					1
Join club or extra-curricular activity					1	1
Lunch time English lab				1	1	2
Lunch time math lab				1	1	2
Mandatory after school detention				1		1
Meet with teachers directly for extra help					1	1
Meeting with attendance specialist		1				1
Mentoring		1		1		2
Modified Workloads		1				1
Movement Opportunities					1	1
Parent/teacher conference	1	1				2
Parental check-ins				1		1
Peer tutor			1			1
Phone calls to parents	1					1
Phrase-cued text reading			1			1
Preferential Seating		1	1	1	1	4
Providing class notes or note taking template			1	1		2
Read aloud test			1			1
Reading intervention class	1					1
Reading specialist				1		1
Recommend regular meetings/conduct meetings with counselor/mental health therapist/school psychologist				1	1	2
Redirecting student in the classroom					1	1
Reduction in homework					1	1
Referral to student success coordinator		1				1
Referrals to private practice	1					1
Saturday academy				1		1
Saturday school				1	1	2
Scan email assignments directly to teachers					1	1
Small Group Tutorial			1			1
Social work support for family needs				1		1
SOL Prep: Before and after school remediation for Math and LA			1			1
Students take test in alternative setting		1		1		2
Study carrels or Private work spaces		1				1
Study guides			1			1
Substance abuse referral	1	1				2
Time management and organizational coaching		1				1
Verbal and non-verbal reminders/cues			1			1

HIGH SCHOOL INTERVENTIONS

	Langston	Washington-Lee	Arlington Mill	Wakefield	Yorktown	TOTAL
Weekly progress report to parents				1	1	2
Work with minority achievement coordinator		1				1
TOTALS	17	19	16	19	23	94

**Please note that the specific language for the interventions may differ between school, and assumptions may have been made on some listed items.

Appendix W. Feedback from IAT Chairs & Teams

A nine-page document feedback from IAT chairs and teams was provided to the PCG team. This feedback included 2.5 pages of IAT strengths, 2.5 pages of areas in need of improvement and 3.25 pages of strategies to improve the process.¹⁵⁴ Please note that this analysis is based on a working draft document and does not reflect the views of all IAT Chairs.

Strengths of the process include such comments as: staff commitment and active participation; parent involvement and active participation in meetings; encourages teachers to reflect about student learning. Notably, however, none of the comments included statements about improvement in student academic performance or positive student behavior.

Areas in need of improvement. Examples include: simplifying process and paperwork; teacher follow-through; student buy-in; realistic strategies to help classroom teachers effectively manage intervention implementation; systemic way to review plans to ensure implementation; systemic way to ensure classroom teachers review plan before new school year; increase referral to the IAT Process; determining needs that can be accommodated within general education versus need for special education; having information about interventions available at time of meeting; more concise meeting notes; better recommendations for behavior; tracking interventions; clearing up misconceptions that IAT is stepping stone to special education; improving elementary/middle school transition; consistent referral methods; including reading/ESOL specialists at meetings; communicating with parents prior to meeting; data not included in referral consistently; form not family friendly; better training for new teachers; consistently using research-based interventions for math and writing; over-referral by some teachers; implementation consistency; ADHD interventions; meeting record sheet difficult to maintain; lack of documentation showing interventions used; and large staff turnover requires annual training.

Strategies to improve the IAT process. A total of 51 different strategies were suggested, including: develop plan all parties agree to and are held accountable for; give teachers IAT minutes and have them meet with chair before meeting to ensure implementation; brainstorm on implementation; IAT chairs meet with teachers and review plans for implementation; provide IAT plan with notes to increase accountability of all involved; remind teachers to check cum folders for IAT plans at beginning of year and confer with previous teacher or IAT members; remind teachers about IAT process to identify students; training on child find, differentiating instruction, etc.; continue to redefine plan; utilize the E school+/IAT data entry system; have teachers document at least two prior meetings with parents on initial IAT referral form; create binder of resources; meeting schedule on-line to update information; actively engage parents; additional professional development on behavior management; chair consult with IAT colleagues from other schools; team will meet in fall to brainstorm ways to improve follow-up on students; list of accommodations and strategies for teachers; training for new teachers; presentation at PTA meetings; develop morning "coffee session/principal chat" to educate parents; educate staff about process, data collection, research-based second tier interventions; support teachers in implementing ADHD behavioral interventions; observe students before meeting; new IAT form; send reminder emails to staff before meetings and ask them to bring intervention documentation; etc.

The feedback was provided in the form of individual bulleted items under each of the three sections; none of the items were grouped by theme or relatedness. In addition, no information was provided in terms of how this information would be used to improve the IAT process in the future.

¹⁵⁴ IAT School-Level Evaluation Summary

Appendix X. Review of APS Section 504 Procedures

PCG reviewed APS's guidelines for Section 504 to consider their alignment with the requirements of the federal Americans with Disabilities Education Act (ADA). Although the ADA is a more comprehensive civil rights law than Section 504, when Congress amended the ADA, effective January 1, 2009, it included a provision stating that the law's expanded definition applied also to Section 504. For public elementary and secondary education school systems, the ADA and Section 504 have the same coverage and protections and important implications with respect to the revision of policies, procedures and practices.

To consider APS's current policies and procedures in this area, the PCG team reviewed the following documents: Section 504 Guidelines (revised 2008); draft Section 504 Guidelines (October 2011); draft Section 504 Guidelines (January 2012); the "504 Meeting Process," "Transitioning Back to School;" the "504 Question and Answer Brochure; and information available on the Student Services website.

The information below includes a summary of these documents and PCG suggestions for specific changes, which are designated by **bold** text, to reflect current Section 504/ADA requirements. This section also highlights PCG's findings based on conversations with participants from the case study review of students with Section 504 and Health plans.

PLEASE NOTE: Prior to the submission of PCG's first interim report, the PCG team provided an advance draft of this section to the district to inform the district's current activity to revise the guidelines and related documents. Subsequently, APS provided an updated version of the guidelines and the PCG team offered a few additional comments on the document, which is now entitled, "Arlington Public Schools Section 504 Procedural Manual." The PCG team is impressed by the comprehensiveness of the updates. As of May 10, 2012, after two additional rounds of edits, PCG feels confident that APS included most of the recommendations listed in the section below in the revised 2012 guidance document. PCG is very pleased by the results and feels that the policies and procedures match the revised Section 504 federal requirements.

About Section 504

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

No otherwise qualified individual with a [disability] ... shall, solely by reason of [her or his disability], be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance...

Because APS receives funds from the U.S. Department of Education, it must have policies, procedures and practices that meet the Department's Section 504's implementing regulation. In 2008, Congress amended the Americans with Disabilities Act (ADA), which applies also to Section 504. In the discussion below, references to Section 504 incorporate the ADA requirements, including its 2008 amendments.

APS's draft January 2012 Section 504 Guidelines document is more closely aligned with Section 504 requirements than were previous drafts. However, there are a number of areas that should be reviewed

further in light of PCG team comments specified below. Unless otherwise noted, all analysis below is from the 2012 guidelines:

Title

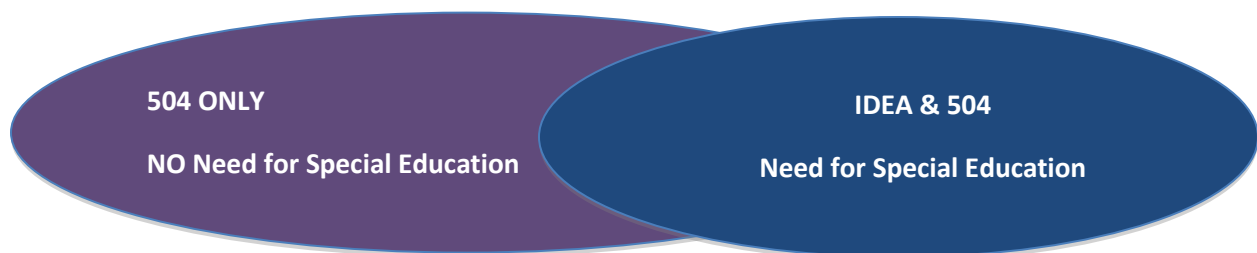
The document has a title that reflects it is a “Guideline.” This term, however, may connote to some that its contents are not required. **Given that the document is APS’s universal source for describing required procedures under Section 504, another term, such as Section 504 Procedures, Section 504: A Procedural Manual, etc., may better represent its intended use.**

Introduction

The draft Section 504 Guidelines makes numerous comparisons between Section 504 and the Individuals with Disabilities Education Act (IDEA). **Providing a paragraph that addresses the major similarities and differences between these two statutes could provide clarification in the introductory section. For example, language such as the following may be useful:**

Section 504 is a broad civil rights law designed to protect the rights of individuals with disabilities in programs and activities that receive federal financial assistance. The ADA is a more comprehensive civil rights law than Section 504. When Congress amended the ADA, it included a provision stating that the law’s expanded definition applied also to Section 504.

IDEA covers only students with specific disabilities who require special education services to benefit from an education. Disability areas are not specified under Section 504, and a student with disabilities is protected even if (s)he does not need special education services and needs only supplementary related aids and services. Thus, many students are covered under both IDEA and Section 504; however, students who do not meet IDEA but do meet Section 504 requirements have Section 504 protections only. The graphic below illustrates how Section 504 and IDEA overlap.¹⁵⁵



Record of Impairment & Regarded as Having Impairment

The Guidelines state:

These last two prongs create a very different type of Section 504 eligibility. While a ‘record of’ an impairment ‘regarded as having’ an impairment give rise to anti-discrimination protection under Section 504, these two prongs do not trigger the school district’s obligation to provide a free appropriate public education or FAPE. Consequently, the district has no duty to identify, assess, or place students who qualify only under these prongs.

¹⁵⁵ Students with an IEP do not typically have a Section 504 plan because any accommodations may be documented and provided through the comprehensive IEP process.

However, as explained in the Question and Answer document at page 16 regarding the question about “mitigating measures” and how they affect the Section 504 process, a student may be determined to have a disabling condition and be considered eligible for the non-discrimination protections of Section 504, but may not necessarily require accommodations or services in order to have equal educational opportunity. Although Section 504 committees may not consider mitigating measures in determining the existence of a disability, they should consider the effects of mitigating measures when determining the need for an accommodation plan. Thus, students with disabilities may qualify for the protections provided by Section 504, but may not require an accommodation plan if there are mitigating measures which sufficiently ameliorate the effects of the disability.

The Guidance should be modified to emphasize a student’s eligibility for the protections of Section 504 even though he or she may not require accommodations because of the ameliorative effects of mitigating measures. Note that in such a situation the Section 504 plan may address actions that will be taken in the event that the mitigating measures are not effective or used, e.g., the student is not taking prescribed medication, etc. Also, when mitigating measures have ameliorated the effects of a student’s disability, the Section 504 plan should include these measures (e.g., medication, instructional accommodations, etc.) so that the student can continue to benefit from their use.

Major Life Activity (Page 3)

The draft Guidelines state:

Note: Where the major life activity is learning, the child may be eligible under IDEA-2004 and an IEP may be appropriate.

Even when a student has a disability that significantly impacts the major life activity of learning, that student may not need specifically designed instruction to benefit from an education and may benefit from Section 504 accommodations. **Other language to consider for the Guidance may be: ... the child may be eligible under IDEA-2004 and an IEP may be appropriate if he or she requires specifically designed instruction to benefit educationally. If not, and the student requires only supplementary aids related services, and/or accommodations, a Section 504 plan would be appropriate.**

In addition, as discussed below under “A. Referral” there are several areas in the draft and Question and Answer documents that state: problems with learning (reading or thinking) can “best be done” through an IDEA evaluation. Comments about this issue are provided below.

Section 504 Process (Page 4)

The end of the introductory paragraph refers to the Section 504 Coordinator and recommends that this individual or designee attend all initial eligibility determinations. This information is repeated on page 8 at the bottom of the second full paragraph.

An alternative approach could be to ensure that each school has at least one individual who can act as the principal’s designee to become very familiar with the relevant procedures. Principals should be accountable for ensuring that the procedures are followed upon their finalization and provision of training. Many school districts with which the PCG team has worked across the country operate in this manner.

Referral (Pages 4-5)

The following statement is repeated several times in the draft Guidance and the Question and Answer documents: For problems with learning, reading or thinking (such as attention disorders), this can best be done through an IDEA evaluation. (Statement is repeated above at in first full paragraph on page 8; and at the end of the Question and Answer document pertaining to private psychological or psycho-educational diagnoses and evaluations at page 18.)

As a general rule, it is not appropriate to state that IDEA is a better approach for addressing impairments involving learning, reading or thinking in the absence of a full consideration of a student's needs. **Alternative language to consider may be: For problems with learning, reading or thinking (such as attention disorders), the Student Study Committee (SSC) considers whether a student is suspected of having a disability and may need special education services to benefit educationally.** If the answer is that special education services are not suspected as being necessary, Section 504 would be the appropriate option. In other districts, Section 504 has been a useful tool for accommodating students with "attention disorders," i.e., attention deficit hyperactive disorder, and there is no apparent reason for not considering this service as an option.¹⁵⁶ Similarly, students with a documented reading disability who may not qualify under IDEA may meet Section 504 eligibility criteria and benefit from supplementary aids and services.

Screening (Page 6)

The end of the second paragraph states: Minutes of all proceedings, recommendations and supporting documents must be maintained in the student's educational record with a copy forwarded to the Section 504 Coordinator at the Office of Pupil Services, Department of Student Services.

Consider eliminating the requirement that all documents be forwarded to the Section 504 coordinator. Schools retain many important documents about students. Remembering to copy the Section 504 Coordinator each time documents change is error prone and the time needed to do so is time consuming. Rather, a procedure that requires schools to maintain such records in a confidential and accessible manner with accountability for this outcome may be a preferable option.

Medical Conditions Not Affecting School Access or Performance (Page 6)

At the bottom of page 6, the document suggests that the following statement be provided for a student with medical conditions that are not affecting school access or performance:

Student has a diagnosed and documented health condition which is not currently affecting access to school, school performance or participation. The school nurse will maintain medical information (by parents) in the Clinic. The parents or guardians have been provided with their Section 504 Parental Rights and Procedural Safeguards. The committee will reconvene upon request.

The PCG team is unaware of any Section 504 provision that would exclude from its coverage a diagnosed and documented health condition, which meets the definition of a Section 504 health impairment, when it currently is not affecting access to school, school performance or participation. Instead, the consideration for such a documented physical condition is whether it substantially limits a major life activity including (*but not limited to*) caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, reading, communicating, concentrating, lifting, bending, eating,

¹⁵⁶ In APS, 3.2% of the total student enrollment has been identified as having another health impairment (the majority of whom most likely have ADHD), compared to only 1.3% in the nation. This disparity may be the interpretation described above.

sleeping and working. None of these major life activities have a requirement that the physical condition affect the student's access to school, school performance or participation. **APS should reconsider its interpretation of Section 504 consistently with the language in the prior sentence.**

Refer to Student Study Committee for Possible IDEA Evaluation. (Page 7)

The draft Guidance states:

The Section 504 Committee may determine on the basis of existing documentation that a suspected disabling condition may exist **that adversely affects the student's** education. In this case, the Section 504 Committee may refer the student to a Student Study Committee for consideration of a comprehensive evaluation....

Consider amending the above in the following way: that a suspected disabling condition may exist that adversely affects the student's performance and require specifically designed instruction for the student to benefit from an education... IDEA eligibility is based on the additional criteria that a student has a need for special education services, not solely that he or she has a disabling condition that may adversely affect his/her education.

Assessment and Reassessment (Page 7)

The draft Guidance states that prior to a Section 504 referral for an assessment, there may be situations where the school can address the student's needs through school-based interventions and/or modifications. If these are successful, there is no obligation to refer for an evaluation.

The ADA amendment's impact on Section 504 is especially important with respect to the example above. As discussed later below in the section that considers the Question and Answer document, the Section 504 now requires Committee members to ignore the ameliorative effects of mitigating measures, such as a student's success with the IAT process. Instead, the Committee must answer two questions: 1) is there suspicion that the student may have a physical or mental impairment meeting Section 504's definition; and, if so, 2) does the impairment substantially limit a major life activity (without consideration of the mitigating measures and any accommodations the student is receiving). In other words, the Committee would have to consider whether the impairment substantially limits any one of the major life activities without the benefit of the IAT process, medication, etc.

In a recent March 1, 2012 court case, the 9th Circuit found that the progress a student made in small support classes focused on reading and math skills undermined her parent's claim that she was eligible for IDEA services.¹⁵⁷ Concluding that the classes were not specifically designed instruction, the 9th Circuit upheld a District Court's determination that the student was not a child with a disability under the IDEA. The 9th Circuit explained that students who can benefit from general education classes with accommodations and modifications do not have a need for special education.¹⁵⁸ Importantly, the court concluded that the defendants could meet the student's needs with a Section 504 plan. **Consider editing the draft Guidance consistent with the above comments.**

¹⁵⁷ C.M., by and through her mother, Jodi M., Plaintiff-Appellant, v. Department of Education, State of Hawaii, U.S. Court of Appeals, Ninth Circuit, 10-16240, at 112 LRP 10467. (Unpublished decision.)

¹⁵⁸ The parent argued that the student's Read 180 program, pre-algebra course, and math lab qualified as specialized instruction but the 9th Circuit disagreed. The court also determined that the ED evaluated the student in all areas of suspected disability, and that the student did not qualify for services under the category of SLD or OHI.

Section 504 Plan and Placement (Page 9)

The second paragraph under this section refers to students who require curricular modifications because of his or her disability and that they should be served under IDEA-2004. It also refers to any student who exhibits disability-related behaviors that are recurring and that significantly impact education, and who may require behavior management interventions and that they should be included as part of the Section 504 plan for an eligible student.

In either case, the guidance might be clearer if the standard for determining whether a student may be eligible under IDEA or Section 504 is cited rather than reflect a judgment call for the manner of service. In the first example, where there is a need for curricular modifications, such students may be suspected of needing IDEA specifically designed instruction. In the second example, consideration should be given with respect to whether the student who may require behavior management interventions may also require special education services. Only if such specifically designed instruction is not suspected to be necessary would Section 504 be the more appropriate route.

Parent Preference for Section 504 in Lieu of IEP (Page 10)

In the second paragraph on page 10, the information pertains to parents requesting Section 504 to avoid placing the student in “special education.”

Rather than enclosing special education within quotation marks, consider enclosing the phrase “placing the student in special education.” Such use of the quotation marks would avoid serious consideration that the district considers special education as a “place” rather than a “service.” Alternatively, consider the following language: to avoid having the student receive special education services.

Permissive versus Required Language (Page 10)

The third paragraph on page 10 uses the term “should” or “may” to describe a variety of activities required by Section 504, e.g., “[i]f the 504 Committee determines that testing accommodations are required, then such accommodations should be provided

In this paragraph, the terms “should” or “may” are used to describe various requirements. **It may be better to use the more mandatory terms as “must” or “shall.”** This would be true for any other sentence in the draft that uses the terms “should” or “may.”

Discipline (Page 11)

In the second paragraph under “The Reevaluation and Manifestation Determination Process,” information is provided regarding students with misconduct that is caused by his/her disability and that such a student could not be suspended or expelled.

It should be noted that Section 504 does not protect a student with a disability who is currently engaged in the illegal use of drugs or alcohol. Thus, for students covered only under Section 504, the manifestation determination is not relevant. Also, the draft does not refer to the other two special circumstances specified in IDEA that would allow a change in placement when a student’s misconduct is a manifestation of his or her disability: when the infraction involves the use of alcohol or serious bodily injury. **Consider revising the draft Guidance to reflect these comments.**¹⁵⁹

¹⁵⁹ See the VA Department of Education’s PowerPoint, *Keys to Implementation in Virginia’s Schools*, page 24-32 for more information about this topic and about Section 504 in general.

Change of Section 504 Plan Prior to Meeting (Page 12)

The second before the last paragraph prior to F. Review and Reevaluation Procedures refers to a circumstance in which it is necessary to change a student's Section 504 plan before a meeting can occur. The information states that this may be done as long as the parent is provided with notice of the proposed change and procedural safeguards. Prior to this statement at the third paragraph on page 11 the draft states that reevaluation procedures complying with IDEA fulfill the requirements of Section 504.

Note that under IDEA, on the date on which the decision is made to make a removal that constitutes a change of placement of a student with a disability because of a violation of a code of student conduct, the school district must notify the parents of that decision, and provide the parents the procedural safeguards notice. A meeting to consider manifestation determination must be held within 10 school days of any decision to change the placement. **Consider modifying the draft Guidance to reflect this information.**

Additional Areas for Consideration

It may be appropriate to include in the Section 504 Guidelines information about various supplementary aids and services that may be considered for students with Section 504 plans, stressing that this list is not exclusive. In addition, information about the consideration of state and local assessment accommodations may be discussed, linking VA's State Assessment Program document discussed below under the Special Education Policy and Procedures Implementation Manual (Appendix N).

In addition, the VA document includes information about assessment accommodations for students receiving Section 504 services; **consider referencing this information in the Section 504 Guidelines.**

Section 504 Questions & Answers

There is a significant amount of information that appear in the Questions and Answers document that are very important as they pertain to changes in the ADA and, as a result, to Section 504 and impact the district's consideration of a student's eligibility.

How does the ADA affect the Section 504 eligibility process? (Page 16)

The answer explains for the first time in the draft that the determination of "substantial limitation" must be made without regard to the ameliorative effects of mitigating measures, such as medication, hearing aids, etc. Furthermore, the eligibility committee cannot consider the use of assistive technology, reasonable accommodations, auxiliary aids or services, or learned behavioral or adaptive neurological modifications. Ordinary eyeglasses and contact lenses are not included in this provision.

The answer to this question, as well as the one below, includes extremely important information that reflects changes to Section 504 as a result of the ADA amendment. **Consider adding this information to the body of the draft guidance, along with examples for its application.**

What are "mitigating measures" and how do they affect the 504 process? (Page 16)

This answer further explains in the second paragraph that Committees must examine the degree of limitation on a major life activity, estimating the impact of the disabling condition as if the mitigating measure were not in effect. In many instances, it will be helpful to review the student's records to estimate his or her functioning prior to the onset of medication or other mitigating measure. A student may be determined to have a disabling condition, and be considered eligible for the non-discrimination

protections of Section 504, but may not necessarily require accommodations or services in order to have equal educational opportunity. Although committees may not consider mitigating measures in determining the existence of a disability, they may consider the effects of mitigating measures when determining the need for an accommodation plan. Thus, students with disabilities may qualify for the protections provided by Section 504, but may not require an accommodation plan if there are mitigating measures which sufficiently ameliorate the effects of the disability.

As discussed above, consider the above information for its inclusion in the body of the draft guidance. Importantly, this explanation addresses students who are covered under Section 504 even though they have disabling conditions that are ameliorated by mitigating measures (including the IAT process) and may not require an accommodation plan. For example, if a student covered under Section 504 has a significant change in placement because of disciplinary suspensions from school, the Section 504 procedural safeguards must be applied even if he or she has not received accommodations and does not have a Section 504 plan.

What about private psychological or psycho-educational diagnoses and evaluations? (Page 18)

When parents consult with professionals outside of the school system prior to bringing their concerns to school staff, the draft states that generally it is advised that students be referred to the IAT prior to being considered for identification under Section 504 or IDEA.

As discussed above, the primary focus in this circumstance should be on whether there is any suspicion that the student has a disability and, if so, whether the student may require specifically designed instruction or solely supplementary aids and services. General advice such as that described above may lead to an unintentional child find issue under either Section 504 or IDEA. **Consider this information when reviewing the draft guidance.**

How are students' needs related to medical diagnoses addressed? What are "care plans," "health care plans," and "medical alerts"? How are they different from 504 Plans? (Pages 18-19)

The draft states, in part: Many students with asthma, diabetes, allergies or other conditions have such plans, which are considered to be a specific type of 504 Plan. ... Copies of APS Section 504 Parent Rights and Procedural Safeguards *should* be provided to the parent/guardians of students with such plans.

The second full paragraph on page 19 refers to students with medical conditions that are considered to be potentially life-threatening, even if well-managed by medication or in remission, are candidates for screening by the school-based Section 504 Committee. These students may be referred for screening, regardless of their academic functioning, etc.

The information continues: "Essentially, the difference between a "health care plan" and a "504 Plan" is that for the latter, that some action or allowance is required from the classroom teacher(s) or other school personnel in order for the student to have an equitable educational opportunity. ... Under Section 504, a student with a health care plan is a student who is entitled to all of the non-discriminatory protections of that statute."

The area of health plans is another major area that is impacted by the ADA amendment that APS should be addressed within the body of the draft Guideline. **The above explanation however may be simplified by stating that any student with a health plan that is not clearly labeled as a Section 504 plan should be considered for eligibility under Section 504.** If the student is eligible, the health plan should clearly state that the student is protected under Section 504 and that appropriate notice, consent and other

procedural safeguards have been or will be followed (with a relatively short time frame for doing so). This procedure should also apply to any new health plans considered for students. In addition, such students found to be Section 504 eligible should be entered in the appropriate electronic system to maintain an accurate count and information about these students.

What about a child who could get straight A's if they received a (sic) Section 504 program? (Page 20)

While there may be a genuine belief that the student is not performing at their potential, perceived underachievement is not, in itself, sufficient reason for referral and assessment. OCR found no duty to qualify a student under Section 504 despite the student having ADHD when the student had acceptable behavior, was making A's, B's and C's in all classes; and there were no other indications that the student was substantially limited in any major life activities.

Although perceived underachievement is not, in itself, sufficient reason for a Section 504 referral and assessment, receiving high grades does not disqualify students from eligibility. As stated in the draft Guidance, Section 504 now requires a broad interpretation with respect to eligibility. If a student has ADHD, Section 504 Committees must be very careful to determine that the condition has no substantial limitation in any major life activity, and disregarding any ameliorative effects of mitigating circumstances. The fact that the student has high grades does not alone impact this determination because they may be earned because of accommodations or other mitigating circumstances, e.g., behavior management, medication, etc. The same analysis may be true for a student with a reading disability who does not meet IDEA criteria. In this case, the major life activity is reading, i.e., the student's reading may be laborious and even more difficult without any accommodations the student is receiving and his/her developed compensatory skills. **The answer to this question should be reconsidered based on this information.**

Can a student be exited from Section 504? (Page 22)

The draft states that with notice to the student's parents of a change in eligibility and the provision of procedural safeguards, that the Section 504 Committee can exit the student.

Under the Section 504 regulation, a reevaluation must be conducted prior to a significant change in placement. A change in eligibility would trigger such a change in placement. **Consider revising the draft to require a reevaluation (which may be based on available information) when considering a student's exit from Section 504 coverage.**

What procedural safeguards are afforded to parents/guardians and adult students?

The list of procedural safeguards does not include any information about steps that must be taken for disciplinary removals that constitute a change in placement. **Consider adding this procedural safeguard to the list provided.**

IDEA & Section 504: A Comparison

Page 25 in the section pertaining to special education versus general education states for Section 504: an eligible student is protected by Section 504 regardless of whether the student requires *special* education or specifically designed instruction. Some students protected by Section 504 are in general education full-time and are not provided any special education. **In the third line in the above statement, consider substituting the term "general" in place of "special" education.**

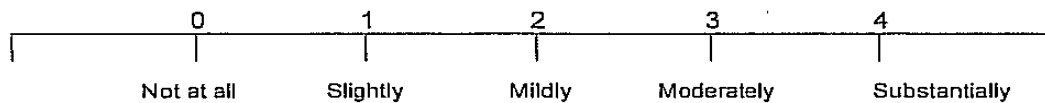
Section 504 Eligibility Document

The January 2012 draft Section 504 Guideline did not include an eligibility form. The draft of October 21, 2011 includes an eligibility form that directs the Section 504 Committee to use the matrix below to determine whether a student's impairment constitutes a substantial limitation on a major life activity.¹⁶⁰

Although the form includes directions that the Committee is not to consider any mitigating measures that the student might use, such as medication or learned adaptive behavior, the directions do not include the provision that the term "substantial limitation" is to be interpreted "broadly and inclusively."

Exhibit 3.1. Matrix for Determining Substantial Limitation on Major Life Activity

c. Specify the **extent of impairment** on the following scale to indicate the level at which the impairment noted above limits the major life activity on the scale below.



Scale guidelines:

- Slightly:** Student appears to be experiencing some behaviors associated with his/her diagnosed condition, but these do not create a limitation for him/her.
- Mildly:** Student is experiencing some behaviors associated with his/her diagnosis; teachers and parents are providing support as needed; level of support provided is similar to that provided to many grade-level peers.
- Moderately:** Student is experiencing several behaviors associated with his/her diagnosis; teachers and parents are providing support on a regular basis, more than that which is provided to many peers.
- Substantially:** Student is experiencing numerous behaviors associated with his/her diagnosis; teachers and parents are providing consistent support on a daily basis; support provided is critical to the student's academic opportunity.

¹⁶⁰ 10-21-11 draft, page APS 504 Guidelines, p. 37 of pdf draft (25 504 Policies and Procedures.pdf)

Although the ADA Amendment did not change the term *substantially limits*, the Act clearly states that this term is to be construed broadly and inclusively. The Amendment's findings and purposes specifically rejected two Supreme Court and various lower court decisions that interpreted the ADA narrowly. Congressional language found that these decisions incorrectly ruled that individuals with a range of substantially limiting impairments did not have disabilities.¹⁶¹ House Managers advised that the Amendment *lowers the standard* for determining whether an impairment constitutes a disability and reaffirmed the intent of Congress that the ADA's definition of disability is to be interpreted broadly and inclusively. They expressed their intent to reduce the depth of analysis related to the severity of the impairment limitation and instead focus on the question of discrimination.¹⁶² **Consult with district attorneys regarding these concerns and reconsider the current draft's more narrow interpretation of substantial limitation.**

¹⁶¹ Sec. 2 Findings and Purposes

(a) *Findings.* The Congress finds that

- (1) in enacting the Americans with Disabilities Act of 1990 (ADA), Congress intended that the Act 'provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities' and provide broad coverage;
- (2) in enacting the ADA, Congress recognized that physical and mental disabilities in no way diminish a person's right to fully participate in all aspects of society, but that people with physical or mental disabilities are frequently precluded from doing so because of prejudice, antiquated attitudes, or the failure to remove societal and institutional barriers;
- (3) while Congress expected that the definition of disability under the ADA would be interpreted consistently with how courts had applied the definition of handicap under the Rehabilitation Act of 1973, that expectation has not been fulfilled;
- (4) the holdings of the Supreme Court in *Sutton v. United Airlines, Inc., ...* (1999) and its companion cases, and in *Toyota Motor Manufacturing, Kentucky, Inc. v. Williams, ...* (2002) have narrowed the broad scope of protection intended to be afforded by the ADA, thus eliminating protection for many individuals whom Congress intended to protect; and
- (5) as a result of these Supreme Court cases, lower courts have incorrectly found in individual cases that people with a range of substantially limiting impairments are not people with disabilities.

(b) Purposes- The purposes of this Act are--

- (1) to carry out the ADA's objectives of providing 'a clear and comprehensive national mandate for the elimination of discrimination' and 'clear, strong, consistent, enforceable standards addressing discrimination' by reinstating a broad scope of protection to be available under the ADA;
- (2) to reject the requirement enunciated by the Supreme Court in *Sutton v. United Airlines, Inc. ...* (1999) and its companion cases that whether an impairment substantially limits a major life activity is to be determined with reference to the ameliorative effects of mitigating measures;
- (3) to reject the Supreme Court's reasoning in *Sutton v. United Airlines, Inc.* (1999) with regard to coverage under the third prong of the definition of disability and to reinstate the reasoning of the Supreme Court in *School Board of Nassau County v. Arline ...* (1987) which set forth a broad view of the third prong of the definition of handicap under the Rehabilitation Act of 1973;
- (4) to reject the standards enunciated by the Supreme Court in *Toyota Motor Manufacturing, Kentucky, Inc. v. Williams ...* (2002), that the terms 'substantially' and 'major' in the definition of disability under the ADA 'need to be interpreted strictly to create a demanding standard for qualifying as disabled,' and that to be substantially limited in performing a major life activity under the ADA 'an individual must have an impairment that prevents or severely restricts the individual from doing activities that are of central importance to most people's daily lives'; and
- (5) to provide a new definition of 'substantially limits' to indicate that Congress intends to depart from the strict and demanding standard applied by the Supreme Court in *Toyota Motor Manufacturing, Kentucky, Inc. v. Williams* and by numerous lower courts.

¹⁶² P.L. 110-325, §2(b); also see VA Department of Education, *Keys to Implementation in Virginia's Schools* at page 16 http://www.doe.virginia.gov/special_ed/tech_asst_prof_dev/section_504_implementation_va.pdf.

Questions & Answers About Section 504 & Parental Rights

This brochure provides good information about Section 504 and relevant procedures. However, the information does not include important updates resulting from the ADA amendment, such as the specified list of major life activities and the importance of not considering the ameliorative effects of mitigating measures. In addition, the information contains several provisions that have been commented on above. **Consider revising the brochure in light of these comments.**

Service Animals

Effective March 15, 2011, U.S. Department of Justice regulations govern the use of service animals by people with disabilities.¹⁶³ Service animals (primarily dogs but also may be miniature horses) are individually trained to do work or perform tasks for a person with a disability. Under the regulation, service animals must be permitted to accompany people with disabilities in all areas where members of the public are allowed to go. This requirement does not cover service animals having a sole function of giving comfort or emotional support. Additional information is provided also by the Virginia Department of Education's Guidelines for School Division Policy and Procedures Regarding Service Animals in Virginia's Public Schools.¹⁶⁴ **Consider adding information about the use of service animals in the Guidelines. At a minimum, provide information to staff regarding this relatively new requirement.**

¹⁶³ www.ada.gov/service_animals_2010.htm

¹⁶⁴ [GUIDELINES FOR SCHOOL DIVISION POLICY AND ...](#)

Appendix Y: Section 504 Survey Responses

Staff Survey Responses

There were a total 2,952 staff members asked to take one survey and identify the populations of students they work with. In total, PCG received 990 staff survey responses at a rate of 33.5%. Out of the 990 APS staff who took the survey, 455 of those employees identified themselves as working with students with Section 504 plans. The 504 portion of the survey was designed to acquire their perceptions of the effectiveness of the 504 program. Relevant staff members were asked to complete the online survey by the APS central office, superintendent and school leadership.

In addition to background information on their position and the school population they served, the survey items focused on staff experiences with: 1) 504 processes; 2) staff communication and support within the school; 3) professional development; and 4) communication with parents and parent involvement. Staff were also asked to identify areas that were a major barrier or obstacle to providing 504 services in their school. See Appendix K for a copy of the survey. Staff were asked to use the following rating scale to indicate their level of agreement with items in the survey based on their experiences with the 504 program and students receiving 504 support in their school.

- | | |
|-------------------------------|--|
| 4 = Strongly Agree: | This was/is <i>true nearly all of the time.</i> |
| 3 = Agree: | This was/is <i>true most of the time.</i> |
| 2 = Disagree: | This was/is <i>not true most of the time.</i> |
| 1 = Strongly Disagree: | This was/is <i>almost never true.</i> |
| Don't Know: | <i>I don't know.</i> |

The figures show the percent who agreed (i.e., checked either “Strongly Agree” or “Agree”). The percentages are based on the valid responses for each item, that is, those respondents who did not check “Don’t Know,” and thus the number of responses for each item varied somewhat. **Highlighted in bold are those items where 60% or less agreed with an item, indicating that 40% or more of the staff responding to the survey did not feel the special education program reflected effective practice in the particular area.**

Figures 2a. through 2d. display the results for the total respondents and respondents by grade level.

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 Evaluation of APS Services for Students with Special Needs
 January 2013

Table 2a. Staff Perception of the § 504 Services and Processes—Responses by Grade Level Arlington Public Schools, VA					
	Grade Level				
	Across All Grades (N=455)	PK-5 (N=182)	6-8 (N=100)	9-12+ (N=98)	More Than One Grade (N=75)
	% Agree	% Agree	% Agree	% Agree	% Agree
1. Overall, I believe that my school delivers highly effective education supports for students with § 504 in my school.	81%	75%	90%	83%	83%
2. Our school consistently follows a well-defined and systematic process for implementing interventions (when appropriate) prior to referral for a § 504 evaluation/supports.	70%	73%	70%	83%	65%
3. The evaluations conducted through the § 504 process are sufficiently comprehensive to identify students' specific strengths and needs.	69%	68%	65%	83%	75%
4. The results of § 504 evaluations are shared with me in ways that provide meaningful insights into students' educational needs.	71%	68%	74%	83%	76%
5. The § 504 process in the school involves parents and school personnel as partners in making recommendations.	78%	76%	79%	83%	84%
6. The services and/or accommodations, in my students' § 504 plan are provided consistently as written.	73%	70%	73%	83%	71%

Note: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.

	Grade Level				
	Across All Grades (N=456)	PK-5 (N=182)	6-8 (N=100)	9-12+ (N=98)	More Than One Grade (N=76)
	% Agree	% Agree	% Agree	% Agree	% Agree
1. There is sufficient communication between teachers, nurses and other personnel to implement § 504 plans.	69%	68%	68%	74%	66%
2. General education teachers are provided with sufficient information and support for helping the students with § 504 plans in their classrooms.	64%	66%	58%	72%	56%
3. I receive the support I need from the administration when facing challenges related to teaching or serving students with § 504 plans.	71%	72%	70%	73%	66%
4. The district provides useful professional development related to meeting the needs of students with § 504 plans.	44%	43%	38%	45%	54%
5. The training sessions I attended have been helpful to me in supporting the learning of students with § 504 plans.	46%	43%	38%	46%	62%

Note: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.

Table 2d. Staff Perception of Barriers to § 504 Supports and the Progress of Students with § 504 Plans—Responses by Grade Level, Arlington Public Schools, VA

	Grade Level				
	Across All Grades (N=457)	PK-5 (N=181)	6-8 (N=100)	9-12+ (N=100)	More Than One Grade (N=76)
	% Agree	% Agree	% Agree	% Agree	% Agree
1. Staff don't have sufficient time to collaborate with each other.	59%	56%	63%	62%	56%
2. General education teachers need more focused professional development on § 504.	47%	44%	57%	36%	58%
3. There is insufficient communication and collaboration among school personnel and parents to help students with § 504 plans make an effective transition into our school.	19%	16%	28%	14%	23%

Note: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.

Parent Survey Responses

A total of 63 APS parents of children with Section 504 plan completed an online survey (a response rate of 41%) designed to acquire their perceptions of the effectiveness of the 504 program. APS sent a letter home to parents encouraging their participation. Also, PCG kept the parent surveys available for an additional two week period and Arlington School Talk reminders were sent to parents to prompt them to respond to the survey.

In addition to background information on their child, the survey items focused on parent participation in and satisfaction with the 504 program. See Appendix G for a copy of the survey.

Table 1 depicts the characteristics of the 504 parent survey respondents and indicates that they represented a cross-section of APS families.

Table 1. Survey of Parents of Children with Section 504 Plans Arlington Public Schools, VA		
	Responses	
	#	%
1. Age of Child - Total Responses	63	
2	---	---
3–5	2	3%
6–10	14	22%
11–13	16	25%
14–17	17	27%
18–22	4	6%
Unspecified	10	16%
2. Gender of Child		
Male	28	44%
Female	30	48%
Unspecified	5	8%
3. Current Grade Level of Child		
Pre-Kindergarten	---	---
Elementary School (K–5)	22	35%
Middle School (6–8)	16	35%
High School (9+)	25	40%
Alternative Program	---	---
5. Grade Level Child was Identified for Section 504 Accommodations		
PK	3	5%
Elementary	36	57%
Middle School	9	14%
High School	15	24%
6. Primary Disability of Child		
Health	16	25%
Attention Deficit Hyperactivity Disorder	31	49%
Other	16	25%
Don't Know	---	---
Note: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.		

Parents were asked whether or not they agreed, disagreed or did not know about a variety of statements related to their participation in the 504 process.

Most parents agreed they had the opportunity to take part in the development of their child’s most recent Section 504 plan (93%) and that their requests for modifications and/or accommodations were considered (84%). Half of all parents had asked for special education services for their child at some point.

Parent responses highlighted several areas where the district should engage parents to ensure greater participation. There were very low levels of agreement on the following statements:

- Does your child consistently receive all of the accommodations and modifications that are listed on his/her Section 504 Plan? (31%)
- Does the district offer opportunities for parent training or information sessions about Section 504 supports? (26%)
- In the past year, have you attended parent training or information sessions offered by the district? (23%)
- Have you visited the Parent Resource Center? (31%)

Table 2. Parent Participation in the Section 504 Process—Responses by Grade Level
 Arlington Public Schools, VA

	Grade Level											
	Across All Grades (N=62)			PK-5 (N=21)			6-8 (N=16)			9-12+ (N=25)		
	Yes	No	Don't Know	Yes	No	Don't Know	Yes	No	Don't Know	Yes	No	Don't Know
1. Did APS staff explain to you why your child is receiving Section 504 accommodations?	87%	8%	5%	86%	10%	5%	81%	6%	13%	92%	8%	---
2. Prior to and during the process of obtaining a Section 504 plan, was your school responsive to your concerns about your child’s progress and performance?	67%	33%	---	80%	20%	---	63%	38%	---	60%	40%	---
3. Do you receive a copy of your parental rights (procedural safeguards) from APS at least once each year?	88%	5%	7%	89%	5%	5%	88%	6%	6%	88%	4%	8%
4. Did someone from APS offer to explain your rights to you and answer questions you have?	77%	21%	2%	80%	20%	---	88%	6%	6%	68%	32%	---
5. Did you have the opportunity to take part in the development of your child’s most recent Section 504 plan?	93%	5%	2%	95%	5%	---	94%	0%	6%	92%	8%	---
6. Are you invited to a Section 504 meeting at least once a year?	81%	11%	8%	81%	10%	10%	88%	6%	6%	76%	16%	8%
7. During the process of developing your child’s Section 504 plan, were your requests for modifications and/or accommodations considered?	84%	15%	2%	85%	15%	0%	88%	6%	6%	80%	20%	---
8. At any time, have you asked for special education services for your child who has a Section 504 plan?	51%	48%	2%	60%	40%	0%	69%	31%	---	32%	64%	4%
9. Is your child consistently receiving all of the accommodations and modifications that are listed on his/her Section 504 Plan?	31%	58%	11%	48%	48%	5%	13%	63%	25%	28%	64%	8%
10. Does the district offer opportunities for parent training or information sessions about Section 504 supports?	26%	33%	41%	30%	25%	45%	44%	25%	31%	12%	44%	44%
11. In the past year, have you attended parent training or information sessions offered by the district?	23%	72%	5%	25%	70%	5%	25%	75%	---	20%	72%	8%
13. Have you visited the Parent Resource Center?	31%	67%	2%	20%	80%	---	38%	63%	---	36%	60%	4%

Note: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.

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Parents were asked questions about their satisfaction with their child’s 504 Plan. Table 3a highlights those responses. Overall parents reported a high level of satisfaction, particular with the planning progress. However, parent satisfaction levels drop significantly when asked about their engagement in the plan implementation process. While over 80% of elementary and middle school parents believe that school staff communicate effectively with them, less than half of high school parents agree with that statement. Other areas for improvement across all grades may include the below.

- Parent’s feeling like they have adequate information about their child’s performance;
- Child’s progress report adequately communicates progress; and
- Utility of parent training and information sessions.

Table 3a. Parent Satisfaction with Their Participation in Their Child's 504 Plan—Responses by Grade Level Arlington Public Schools, VA				
	Grade Level			
	Across All Grades (N=62)	PK-5 (N=21)	6-8 (N=16)	9-12+ (N=25)
	% Agree	% Agree	% Agree	% Agree
1. In planning my child’s most recent Section 504 plan, I felt I was a valued member of the IEP team and my opinion was respected.	77%	75%	75%	80%
2. The information I provided about my child was considered when planning and writing his/her most recent plan.	77%	80%	81%	72%
3. In implementing my child’s Section 504 plan, I feel I am a respected partner with my child’s teachers and other support providers.	72%	80%	69%	68%
4. I understand what is discussed at Section 504 meetings.	95%	95%	100%	92%
5. I feel comfortable asking questions and expressing concerns at Section 504 meetings.	85%	86%	87%	84%
6. Teachers/school staff have communicated effectively with me.	68%	81%	81%	48%
7. School staff respond to my concerns in a reasonable period of time.	76%	76%	88%	68%
8. I am getting adequate information about my child’s performance.	51%	60%	69%	32%
9. My child’s progress report effectively communicates positive progress and/or lack	53%	53%	56%	52%
10. The parent training or information sessions that I have attended have been helpful to me.	43%	60%	45%	29%
Note 1: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items. Note 2: Percents in bold indicate where 60% or less of parents show agreement.				

Parents at the high school levels reported the greatest levels of dissatisfaction with the above improvement areas.

Parents were also asked questions related to their satisfaction with their child’s 504 program, participation and progress. Parents did not report an overall high level of satisfaction in their responses

to these questions. Reported satisfaction is in general lowest at the high school level and highest at the elementary level. Items where less than 60% of parents showed agreement are bolded. Transition services across all levels appear to be an area of needed focus for the district. Please note, however, there was a decrease in the number of responses to questions about transition, which may have skewed the results.

Table 3b. Parent Satisfaction with Their Child's 504 Program, Participation, and Progress Responses by Grade Level				
Arlington Public Schools, VA				
	Grade Level			
	Across All Grades (N=62)	PK-5 (N=21)	6-8 (N=16)	9-12+ (N=25)
	% Agree	% Agree	% Agree	% Agree
<i>Parent Satisfaction with Their Child's Program</i>				
1. I am satisfied with my child's overall Section 504 program.	57%	70%	63%	44%
2. My child's teachers are aware of his/her learning needs.	69%	95%	56%	56%
3. The teaching staff have high enough expectations for my child to ensure continued progress.	73%	81%	81%	60%
4. I feel my child's academic program is preparing him/her effectively for the future.	62%	70%	69%	52%
5. Section 504 staff are skilled in providing the services and support my child needs.	57%	70%	63%	44%
<i>Parent Satisfaction with Their Child's Participation and Progress</i>				
1. I am satisfied with my child's overall academic progress in school.	62%	70%	69%	52%
2. My child is developing skills that will enable him/her to be as independent as possible.	66%	70%	75%	56%
3a. I am satisfied with school district transition services for my child (if applicable) from Preschool to Kindergarten. (n=27)	44%	57%	30%	50%
3b. I am satisfied with school district transition services for my child (if applicable): from elementary school to middle school. (n=33)	45%	22%	57%	50%
3c. I am satisfied with school district transition services for my child (if applicable) from middle school to high school. (n=33)	24%	29%	11%	29%
Note 1: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.				
Note 2: Percents in bold indicate where 60% or less of parents show agreement.				

Parents were also asked to indicate any training interests they may have. Those responses are listed in Table 4 below.

Table 4. Training Interest - Section 504 Parent Responses Arlington Public Schools, VA	
	Responses
	#
Understanding the Section 504 Process	9
Supporting Positive Behavior	19
Learning Homework Strategies	13
Other	11

Appendix Z. Special Education Survey Responses

Staff Survey Responses

There were a total 2,952 staff members asked to take one survey and identify the populations of students they work with. In total, PCG received 990 staff survey responses at a rate of 33.5%. Out of the 990 APS staff who took the survey, 892 of those employees identified themselves as working with students with IEPs. The IEP portion of the survey was designed to acquire their perceptions of the effectiveness of the IEP program. Relevant staff members were asked to complete the online survey by the APS central office, superintendent and school leadership.

In addition to background information on their position and the school population they served, the survey items focused on staff experiences with: 1) special education processes, service delivery, progress monitoring, and staffing; 2) staff communication and support within the school; 3) professional development; and 4) communication with parents and parent involvement. Staff were also asked to identify areas that were a major barrier or obstacle to special education services and the progress of special education students in the school. See Appendix I for a copy of the survey.

	Grade Level				
	Across All Grades	PK-5 (N= 440)	6-8 (N= 142)	9-12+ (N= 181)	More Than One
	% Agree	% Agree	% Agree	% Agree	% Agree
1. Overall, I believe that my school delivers highly effective education programs and services for students with disabilities.	90%	91%	85%	91%	92%
2. When relevant for the student, before the school makes a referral to special education, the school makes every attempt to meet the unique needs of students through the IAT process.	82%	89%	82%	72%	70%
3. If a student in dually identified, an ESOL/HILT teacher is consulted and participates in meetings.	61%	70%	49%	48%	59%
4. Our school has a well defined and systematic process for implementing interventions prior to referral.	72%	78%	68%	64%	64%
5. The ESOL/HILT checklist is utilized in the referral process for students who speak another language	47%	60%	25%	30%	48%
6. A lack of sufficient reading intervention support is a major reason for referral for a special education evaluation in this school.	15%	12%	21%	22%	9%
7. The ESOL/HILT checklist is helpful to me in making decisions or plans for students who are struggling.	35%	41%	23%	29%	36%
8. The evaluations conducted through the special education process are sufficiently comprehensive to identify students' specific strengths and needs.	83%	84%	79%	77%	88%
9. The results of special education evaluations are shared with me in ways that provide meaningful insights into students' educational needs.	82%	85%	76%	75%	90%
10. The Individualized Education Program (IEP) process in the school involves general and special education teachers as equal partners in making recommendations.	82%	85%	75%	82%	78%
11. Students with disabilities in the school receive instruction and supplementary aids and services in general education classes to the maximum extent appropriate.	81%	80%	79%	81%	84%
12. Students receiving special education services in separate classes who take Standards of Learning (SOL) assessments receive instruction in the core curriculum.	70%	71%	71%	69%	69%
13. Special education teachers instructing students in taking SOL assessments receive text books for their students that are relevant to their grade levels.	50%	50%	54%	51%	43%
14. Special education teachers instructing students in taking SOL assessments receive teacher versions of text books for the grade level of all their students.	40%	40%	42%	43%	34%
15. My students' IEPs include goals and objectives that are aligned with the general education curriculum.	88%	93%	85%	83%	81%
16. The special education/related services, accommodations, and/or modifications identified in my students' IEPs are provided as written.	89%	90%	87%	90%	84%
17. There is a consistent approach to progress monitoring in this school-there is a schedule and methods/tools for monitoring the progress of students receiving special education services.	77%	80%	68%	77%	75%
18. The school's report card (or other progress report) effectively communicates the progress of students with disabilities.	62%	66%	50%	62%	63%

The figures in the table below show the percent who agreed (i.e., checked either “Strongly Agree” or “Agree”). The percentages are based on the valid responses for each item, that is, those respondents who did not check “Don’t Know,” and thus the number of responses for each item varied somewhat. **Highlighted in bold are those items where 60% or less agreed with an item, indicating that 40% or more of the staff responding to the survey did not feel the special education program reflected effective practice in the particular area.**

Table 2b. Staff Perception of Communication and Support in the IEP Process—Responses by Grade Level Arlington Public Schools, VA					
	Grade Level				
	Across All Grades (N=891)	PK-5 (N=440)	6-8 (N=142)	9-12+ (N=180)	More Than One Grade (N=129)
	% Agree	% Agree	% Agree	% Agree	% Agree
1. There is sufficient communication between general education and special education staff about the needs and progress of students receiving special education services.	75%	80%	66%	73%	74%
2. There is sufficient communication between general education and related services staff (OT, PT, Speech/Language, etc.) about the needs and progress of students receiving services.	67%	73%	56%	58%	74%
3. Adequate time is available for general and special education teachers to collaborate in planning and delivering instruction to students.	32%	35%	23%	35%	30%
4. General and special education teachers follow established standards for co-teaching or collaborative instruction.	53%	60%	40%	53%	44%
5. General education teachers are provided with sufficient information and support for helping the students with disabilities in their classrooms.	66%	72%	54%	63%	61%
6. I receive the support I need from the administration when facing challenges related to teaching or serving students with disabilities.	75%	76%	66%	76%	77%
7. Paraprofessionals are effectively assigned in order to support the learning and progress of students with disabilities.	63%	69%	54%	56%	63%
8. Paraprofessionals are effectively utilized to support the learning and progress of students with disabilities.	63%	70%	50%	53%	65%
9. The training sessions I attended have been helpful to me in supporting the learning of students with disabilities.	68%	73%	50%	62%	78%
10a. The school district provides effective transition services from Preschool to Kindergarten.	36%	43%	12%	18%	65%
10b. The school district provides effective transition services from Elementary School to Middle School.	43%	50%	40%	18%	60%
10c. The school district provides effective transition services from Middle School to High School.	27%	13%	46%	40%	36%
10d. The school district provides effective transition services with planning for transition to post-secondary education, employment, independent living, and community living options.	29%	12%	26%	66%	36%

Note: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.

Table 2d. Staff Perception of Challenges to Special Education Services and the Progress of Students with Disabilities—Responses by Grade Level, Arlington Public Schools, VA					
	Grade Level				
	Across All Grades (N=890)	PK-5 (N=438)	6-8 (N=142)	9-12+ (N=181)	More Than One Grade (N=129)
	% Agree	% Agree	% Agree	% Agree	% Agree
1. Teachers in this school do not have high enough expectations for students with disabilities.	13%	10%	16%	16%	17%
2. Teachers in this school have too high expectations for students with disabilities.	9%	8%	11%	10%	7%
3. General and special education teachers don't have sufficient time to collaborate with each other.	67%	67%	73%	67%	62%
4. Progress monitoring for students with disabilities is not being implemented consistently.	27%	22%	40%	28%	27%
5. General and special education teachers need a toolkit of progress monitoring tools and training in how to use them.	52%	52%	58%	51%	45%
6. Our school needs more guidance in the selection and use of intensive reading interventions for students reading below grade level.	37%	35%	47%	43%	28%
7. Our school needs more guidance in the use of positive behavior supports for students with behavioral issues.	55%	49%	72%	49%	63%
8. General education teachers need more focused professional development on special education and teaching students with disabilities.	64%	63%	69%	58%	70%
9. General education teachers need more focused professional development on differentiating instruction.	57%	56%	57%	56%	63%
10. Paraprofessional teaching assistants need more focused professional development on providing instructional interventions to students.	69%	71%	77%	56%	69%
11. Paraprofessional teaching assistants need more focused professional development on providing positive interventions to students.	68%	69%	76%	57%	69%
12. Our school needs guidance and support on implementing a more systematic IAT process at the elementary level and a broader array of interventions before students are referred to special education at the middle and high school levels.	26%	20%	40%	26%	31%
13. There is insufficient communication and collaboration among general and special education teachers and parents to help special education students make an effective transition into our school.	23%	18%	28%	29%	21%

Note: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.

The survey asked staff to indicate their interest in specific professional development topics that were identified on the survey. Based on the responses in table 4 below, staff responses indicated high interest in professional development topics related to supporting positive behavior, co-teaching and inclusion, differentiated instruction, social skills and progress monitoring.

Table 4. Staff Professional Development Interests Related to Special Education, Arlington Public Schools, VA	
	Respondents (N=990)
	#
Differentiated Instruction	326
General Education Interventions	303
Co-teaching and Inclusion	332
Transition Planning	120
Supporting Positive Behavior	438
Progress Monitoring	310
Social Skills	328
Other	76

Parent Survey Responses

A total of 565 APS parents of students with an IEP completed an online survey (a response rate of 19.1%) designed to acquire their perceptions of the effectiveness of the districts' special education program. APS sent a letter home to parents encouraging their participation. Also, PCG kept the parent surveys available for an additional two week period and Arlington School Talk reminders were sent to parents to prompt them to respond to the survey.

Tables 1 and 2 depict the characteristics of the IEP parent survey respondents and indicates that they represented a cross-section of APS families.

Table 1. Survey of Parents of Children with Disabilities Arlington Public Schools, VA		
	Responses	
	#	%
1. Age of Child - Total Responses	565	
2	8	1%
3-5	80	14%
6-10	243	43%
11-13	130	23%
14-17	90	16%
18-22	14	2%
2. Gender of Child		
Male	411	73%
Female	154	27%
3. Current Grade Level of Child		
Pre-Kindergarten	71	13%
Elementary School (K-5)	281	50%
Middle School (6-8)	116	21%
High School (9+)	87	15%
Alternative Program	10	2%
6. Primary Disability of Child		
Autism	111	20%
Developmental Delay	68	12%
Intellectual Disability	19	3%
Multiple Disabilities	33	6%
Orthopedic Impairment	9	2%
Hearing Impairment including Deafness	4	1%
Specific Learning Disability	110	19%
Speech or Language Impairment	63	11%
Emotional Disability	36	6%
Other Health Impairment	92	16%
Traumatic Brain Injury	1	0%
Visual Impairment including Blindness	3	1%
Don't Know	13	2%
Unspecified	3	1%

Note: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.

Table 2. Survey of Parents of Children with Disabilities Arlington Public Schools, VA			
	Grade Level		
	Across All Grades		
	Yes	No	Don't Know
7. Does your child receive English for speakers of other languages (ESOL)/High Intensity Language Training (HILT) Services? (n=562)	3%	97%	---
8. If you moved into the Arlington Public Schools, did your child receive an IEP prior to enrolling in the Arlington Public Schools? (n=383)	20%	80%	---
9. If you moved into the Arlington Public Schools, was the district's reputation for providing special education services one of the reasons why you chose to move here? (n=345)	17%	83%	---

Note: Percents are based on the valid number of responses for each question. The number of resp

Table 2a. Parent Participation in the IEP Process—Responses by Grade Level Arlington Public Schools, VA															
	Grade Level														
	Across All Grades (N=565)			PK (N=71)			K-5 (N=281)			6-8 (N=116)			9-12+ (N=87)		
	Yes	No	Don't Know	Yes	No	Don't Know	Yes	No	Don't Know	Yes	No	Don't Know	Yes	No	Don't Know
1. Did APS staff explain to you why your child needed special education services in a way that you were able to understand?	89%	10%	1%	94%	6%	0%	91%	9%	1%	85%	12%	3%	83%	13%	4%
2. Are you offered a copy of your parental rights (procedural safeguards) from APS at least once each year?	98%	1%	1%	99%	0%	1%	99%	0%	1%	97%	2%	2%	97%	1%	2%
3. Did someone from APS offer to explain your rights to you or answer questions you have?	88%	10%	2%	93%	6%	1%	89%	8%	3%	82%	17%	2%	89%	9%	1%
4. Did you have the opportunity to take part in the development of your child's most recent IEP?	98%	2%	0%	97%	1%	1%	98%	1%	0%	98%	2%	0%	99%	1%	0%
5. Do you receive notice of an IEP meeting at least once a year?	95%	3%	2%	94%	1%	4%	97%	2%	1%	92%	4%	4%	94%	4%	2%
6. At your child's most recent IEP meeting, did the team discuss the possibility of receiving special education services in the general education class to the maximum extent appropriate?	80%	15%	6%	80%	16%	4%	81%	13%	6%	75%	19%	6%	82%	13%	6%
7. Is your child getting the number and amount of services that are listed on his/her IEP, e.g., speech two times a week for 30 minutes?	69%	12%	19%	87%	4%	8%	67%	11%	22%	61%	19%	20%	70%	12%	19%
8. Do you get routine reports, e.g., progress reports, on how he/she is meeting his/her IEP goals?	68%	29%	3%	76%	23%	1%	64%	31%	5%	66%	32%	2%	75%	23%	2%
9. Does the district offer opportunities for parent training or information sessions about special education services?	84%	5%	11%	79%	8%	13%	82%	5%	13%	89%	3%	8%	85%	6%	9%
10. In the past year, have you attended parent training or information sessions offered by the district?	30%	67%	3%	36%	60%	4%	30%	68%	2%	30%	68%	3%	27%	69%	5%
12. Have you visited the Parent Resource Center? (N=250)	46%	52%	2%	26%	71%	3%	44%	55%	1%	53%	45%	3%	54%	44%	2%

Note 1: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.
 Note 2: "Across All Grades" includes 10 parents of students from the Alternative Program.

Table 2b. Parent Participation in the IEP Process Arlington Public Schools, VA				
Answer only if your child is age 14 years or older	Across All Grades			
	N	Yes	No	Don't Know
13. Did your child receive an assessment to help develop age appropriate postsecondary goals related to training, education, employment and where appropriate independent living skills?	129	41%	33%	26%
14. Has the team developed individualized goals related to postsecondary education, employment, independent living, and community participation, as appropriate?	121	36%	44%	20%
15. Did the IEP team discuss transition to adulthood during the IEP meeting, e.g., career interests?	117	52%	37%	11%
16. Does APS actively encourage your child to participate in IEP meetings?	117	72%	18%	10%

Table 3b. Parent Satisfaction with Their Child's Special Education Program, Participation, and Progress— Responses by Grade Level Arlington Public Schools, VA					
<i>Parent Satisfaction with Their Child's Special Education Program</i>	Grade Level				
	Across All Grades (N=565)	PK (N=71)	K-5 (N=281)	6-8 (N=116)	9-12+ (N=87)
	% Agree	% Agree	% Agree	% Agree	% Agree
1. I am satisfied with my child's overall special education services.	72%	89%	71%	67%	68%
2. My child's teachers are aware of his/her learning needs.	84%	94%	89%	68%	78%
3. My child's therapists, e.g., occupational therapist, physical therapist, speech-language pathologist, are aware of his/her learning needs.	84%	93%	88%	72%	75%
4. My child's English for speakers of other languages (ESOL) needs are provided for in addition to his/her special education needs. (n=193)	23%	23%	25%	16%	14%
5. The teaching staff, including therapists, has high enough expectations for my child to ensure continued progress.	75%	89%	76%	70%	70%
6. I feel my child's academic program is preparing him/her effectively for the future.	68%	81%	72%	52%	64%
7. Special education staff, including therapists, are skilled in providing the services and support my child needs.	75%	90%	76%	67%	69%
8. A general education teacher comes to my child's IEP meeting when general education is being considered.	86%	64%	90%	88%	86%
<i>Parent Satisfaction with Their Child's Participation and Progress</i>					
1. I am satisfied with my child's overall academic progress in school.	69%	86%	70%	61%	62%
2. My child is developing skills that will enable him/her to be as independent as possible.	74%	86%	77%	67%	66%
3. My child has the opportunity to participate in school-sponsored activities such as assemblies, field trips, clubs, and sporting events.	93%	79%	97%	96%	93%
4a. I am satisfied with school district transition services for my child (if applicable) from Preschool to Kindergarten. (n=268)	57%	51%	64%	45%	47%
4b. I am satisfied with school district transition services for my child (if applicable) from elementary school to middle school. (n=251)	48%	13%	27%	67%	58%
4b. I am satisfied with school district transition services for my child (if applicable) from middle school to high school. (n=169)	34%	11%	7%	26%	61%
4d. I am satisfied with school district transition services for my child (if applicable) Planning for transition to postsecondary education, employment, independent living, and community living options. (n=177)	29%	11%	8%	4%	51%
<p>Note 1: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.</p> <p>Note 2: Percents in bold indicate where 60% or less of parents show agreement.</p>					

Table 5. Conflict Resolution—Survey of Parents of Students with Disabilities	
	Across All Survey Respondents (N=547)
	% Yes
1. Have you had disagreements with the School regarding your child’s eligibility, placement, goals, services, or implementation? (n=547)	41%
2a. If yes, did an APS representatives treated you with respect? (n=249)	73%
2b. If yes, were you satisfied with how the district or school attempted to resolve the disagreements? (n=247)	43%

Student Survey Responses

A total of 364 APS high school students with disabilities completed an online survey (a response rate of 41%) designed to acquire their perceptions of the effectiveness of the district’s special education program. While the survey period was extended to allow for additional responses to be captured, APS central office did a great job communicating to staff about the importance of having any high school student with an IEP take the survey. Please note that not all survey participants responded to each survey question asked. In each table, the percentage for each response reflects the number of people who responded to a question, not the percentage based on the total number of participants.

In addition to background information on their age, school, gender and grade, the survey items focused on student experiences and satisfaction with school and the special education process. They were also asked about different learning opportunities in which they might want to participate. See Appendix J for a copy of the survey.

Table 1 provides a description of student respondents. All secondary grades 9-12 and APS high schools were represented.

Table 1. Survey of Students with Disabilities Arlington Public Schools, VA		
	Responses	
	#	%
1. Age - Total Responses	364	
14 Years	50	14%
15 Years	81	22%
16 Years	89	24%
17 Years	81	22%
18-22 Years	63	17%
2. Gender		
Male	246	68%
Female	118	32%
3. Current School		
H-B Woodlawn Secondary Program	4	1%
Wakefield High School	76	21%
Washington-Lee High School	182	50%
Yorktown High School	85	23%
New Directions Program	1	<1%
Career Center	10	3%
ISAEF	1	<1%
Arlington Parenting Teens	5	1%
4. Current Grade Level		
9th	106	29%
10th	87	24%
11th	85	23%
12th	79	22%
I Don't Know	7	2%
5. Primary Disability		
Autism	11	3%
Developmental Delay	3	1%
Intellectual Disability	4	1%
Multiple Disabilities	9	2%
Orthopedic Impairment	2	1%
Hearing Impairment including Deafness	3	1%
Specific Learning Disability	117	32%
Speech or Language Impairment	5	1%
Emotional Disability	24	7%
Other Health Impairment	88	24%
Traumatic Brain Injury	1	<1%
Deaf-Blindness	1	<1%
Other	61	17%
Unspecified	35	10%

Table 2. Student Participation in the IEP Process Arlington Public Schools, VA			
	Grades 9–12+ (N=363)		
	Yes	No	Don't Know
1. Did APS staff explain to you why you needed special education services in a way that you were able to understand?	70%	14%	17%
2. Did you attend your most recent IEP meeting?	80%	10%	10%
3. Did you feel that your views and comments were respected and considered by the IEP team?	67%	12%	21%
4. Do you have most of your classes in general education, in classes also attended by students without IEPs?	67%	15%	18%
5. Do you know what goals your IEP expects you to achieve?	73%	13%	14%
6. Do you know what accommodations are on your IEP (if any)?	59%	16%	25%
7. If you feel you are not receiving an accommodation or service that you are supposed to, do you ask someone for help?	68%	21%	11%
8. Do you receive the services on your IEP?	68%	8%	24%
9. Do you think that you are spending too much time in special education classes?	34%	49%	18%
10. Do the special education services you receive help you in other classes?	69%	16%	15%
11. I have NOT been suspended from school.	66%	29%	5%
12. Do you speak a language at home that is different from school?	42%	54%	4%
13. Do you get information about the progress you are making on your IEP goals?	60%	21%	19%
14. Did someone talk to you about what you want to do after you graduate from high school?	82%	12%	6%
15. Did someone talk to you about your career interests?	84%	10%	7%
16. Are you learning things in high school to help you with your goals after you graduate high school?	75%	14%	12%
17. If you are 18 years of age or older, are you offered a copy of your rights from APS at least once each year and answers to your questions?	20%	33%	47%
Note: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.			

Table 3. Student Satisfaction with The IEP Process Arlington Public Schools, VA	
	Grades 9–12+ (N=363)
	% Agree
1. I feel OK about asking questions about my IEP at meetings.	80%
2. School staff (for example, teachers, transition coordinators, and speech therapists) talk with me about my IEP.	71%
3. My teachers have high enough expectations for me.	80%
4. My teachers talk with me about my progress in school.	84%
5. I receive the help I need to do well in school.	83%
6. I do not need help with my behavior.	75%
7. My teachers are giving me the help I need.	87%
8. My teachers understand me and support me.	76%
9. If I want, I can be in after school activities like clubs, sports, etc.	86%
10. Other students treat me fairly.	85%
11. I am welcomed, valued, and respected in school.	83%
12. I receive the help I need to do well in school.	87%
13. I am getting skills that will help me be as independent as possible after high school.	79%
14. I like school.	58%
<p>Note 1: Percents are based on the valid number of responses for each question. The number of responses varied slightly across the items.</p> <p>Note 2: Percents in bold indicate where 60% or less of students show agreement.</p>	

Appendix AA. Special Education Policy & Procedures Implementation Manual

APS provided its *Special Education Policy and Procedures Implementation Manual (PPIM)*, which begins with a copy of the state's special education regulation and is followed by 28 appendices (not including six that are not in use).

This information was reviewed to determine the extent to which the Special Education Policy and Procedures Implementation Manual (PPIM) provides information that is comprehensive, reader-friendly and easily assessable format. Suggestions for improvement are provided for specific sections below and overall recommendations are provided at the end of this section.

Overall Comments

- Although APS has developed information regarding the district's local practices, it is provided in a series of appendices that are not ordered in any particular manner. For example, preliminary information about the age of eligibility for special education services is not provided until Appendix M; multicultural assessment procedures are not provided until Appendix EE; VA regulatory definitions are provided in the main portion of the document and repeated in Appendix Q.
- This PPIM has some information that is outdated, and does not include information regarding all areas of the special education process. Many of these areas are described below in comments on the appendices.
- The PPIM does not have an overall table of contents with page numbers for easy reference; page numbers in the PPIM are not sequential throughout all appendices, making it difficult to locate each appendix.
- There is no consistent formatting for the information included in the appendices; sometimes the information is outlined and other times it is not.
- Consider developing an online comprehensive special education PPIM consistent with the comments above that will provide links to additional information and resources. Publish the PPIM on a universal Student Services website so that it is available to all stakeholders. In this event, ensure that staff is available to update the PPIM regularly with current information and provide orient school-based staff and parents to its organization and contents.
- An electronic version of the PPIM would allow for links to important information (e.g., more in depth information, resources, and an automated table of contents) would facilitate the document's readability, use and modification based on new information or additional resources.
- It was noted in focus groups and case studies that many teachers and administrators were not aware of the existence of the PPIM and/or did not use it as a resource on a regular basis.

The discussion below provides comments about the various PPIM sections and by bold text suggests considerations for review and amendment.

Regulations Governing Special Education Programs for Children with Disabilities in Virginia

The PPIM provided to the PCG team begins with the *Regulations Governing Special Education Programs for children with Disabilities in Virginia* (VA Regulations). Although it may be useful for APS stakeholders to have easy access to the VA Regulations, the primary purpose of a district's PPIM is to provide

information regarding how these regulatory provisions will be implemented locally. **Present this district-based information in an order that is aligned with district practices, e.g., beginning with an overall introduction and moving on to Child Find, evaluation, etc. Relevant rules regarding time frames, notice/consent, and forms may be referenced when applicable throughout the document and summarized in some location.**

The VA Regulations included in the PPIM are dated July 7, 2009. The VA Regulations were reissued on January 25, 2010 to include technical amendments. **Although the PCG team did not analyze the VA Regulations amendment, the newer version should be used, preferably as an electronic link. In addition, links to the IDEA regulation as well as to other useful relevant websites would be beneficial.**

Analysis of PPIM Appendices

Appendix A. Preschool Referrals

A few lines of information are provided regarding procedures for referred to the SSC. **Such information could be included in a general section on procedures to follow when a student is referred for an SSC, with particular information provided for preschoolers. In addition, information could be provided regarding ages applicable to preschoolers, requirements regarding transition from Part C's infants and toddlers services, and any screening procedures in place.**

Appendix B. Student Study Committee (SSC)

This appendix describes the district's school-based child study approach. It describes the purpose, requirements, timelines and notices. It also describes procedures for limited English students.

The appendix should include the following information:

- The required SSC activity when it decides to proceed with an evaluation for a student: to review and determine what information is currently available for the student's evaluation and any additional information that must be obtained following parental consent.
- The SSC option to refer a student for a Section 504 evaluation (with a possible link to Section 504 criteria and considerations).
- A reference (and possible electronic link) to the district's comprehensive Bridge Manual that contains critical information relevant to the assessment process.

Appendix C. Description of Evaluation Components (Procedural Safeguards)

This appendix includes only the form used to notify parents about the evaluation components of a recommended evaluation. **This form, which is used to provide notice and obtain parental consent for a child's evaluation, should be included with the associated information described in Appendix B.**

Appendix D. Minimum Evaluation Components Required for Initial Eligibility Considerations

This appendix includes a one-page form that describes potential disability areas and what is stated as "minimum evaluation components required for initial eligibility consideration."

In many areas, the minimum evaluation components exceed state and federal regulatory requirements. The state regulation, which is identical to the federal regulation, states the following:¹⁶⁵

¹⁶⁵ 34 CFR 300.305 and 34 CFR 300.507

- B. Determination of needed evaluation data for initial evaluation or reevaluation.
1. Review of existing evaluation data. A group that is comprised of the same individuals as an IEP team and other qualified professionals, as appropriate, shall:
 - a. Review existing evaluation data on the child, including:
 - (1) Evaluations and information provided by the parent(s) of the child;
 - (2) Current classroom-based, local, or state assessments and classroom-based observations; and
 - (3) Observations by teachers and related services providers; and
 - b. On the basis of that review and input from the child's parent(s), identify what additional data, if any, are needed to determine:
 - (1) Whether the child is, or continues to be, a child with a disability;
 - (2) The present educational needs of the child;
 - (3) The child's present level of academic achievement and related developmental needs;
 - (4) Whether the child needs or continues to need special education and related services; and
 - (5) Whether any additions or modifications to the special education and related services are needed to enable the child to meet the measurable annual goals set out in the IEP of the child and to participate, as appropriate, in the general education curriculum.
- C. The local educational agency shall establish policies and procedures to ensure that the following requirements are met.¹⁶⁶
14. Each child is assessed by a qualified professional in all areas relating to the suspected disability, including, **if appropriate**, health, vision, hearing, social and emotional status, general intelligence, academic performance, communicative status, motor abilities, and adaptive behavior. This may include educational, medical, sociocultural, psychological, or developmental assessments. (Emphasis added.)

As indicated above, the state/federal requirements do not require any specific minimum evaluation requirements based on a student's suspected disability. Rather, the assessment is based on all areas relating to the suspected disability, *as appropriate*. Thus, the state/federal rules do not require (like APS) a psychological, socio-cultural or physical evaluation for every student's evaluation.¹⁶⁷ **Review APS's expansive evaluation components in light of the "appropriate" standard of state/federal requirements.**

Appendix E. Preparation for an Eligibility Meeting

The appendix provides some information about the eligibility determination process, primarily focusing on high level activities (e.g., reviewing the evaluation components for completeness, time frames, required notices and minutes, etc.) The information does not include the many important considerations for determining whether a child has a disability and what this decision must be based on. While the appendix states that the Committee should be responsible for "[k]nowing the State

¹⁶⁶ §22.1-214 of the Code of Virginia; 34 CFR 300.304 and 34 CFR300.310

¹⁶⁷ The VA Regulation does require an observation to be an evaluation component for every student.

regulations and guidelines regarding the characteristics and identification of students with disabilities and presenting and clarifying these standards at the Eligibility Committee meeting,” **Link information and any local eligibility criteria that explains in more detail the state criteria.**¹⁶⁸

Appendix F. Adaptive Physical Education

The appendix provides information about the consideration of adapted physical education. **Provide information about the broader area of related services and their purposes, including possible links to a description of the various services and any local/state eligibility criteria for them.**

Appendix G. IEP

The appendix provides some useful information about the IEP process, including its purpose and functions; and limited information about its development. Also, the information states that any change in an IEP must be made in an IEP meeting. The VA Regulation, which is provided below, is identical to IDEA’s and offers a more flexible option to parents and district representatives who may agree not to convene an IEP meeting for the purposes of making such changes. **The VA Regulation requires parental consent prior to the implementation of such changes; apply the flexibility offered by the state/federal regulations to APS’s process.**

Individualized Education Program.

B. Accountability.

9. In making changes to a child’s IEP after the annual IEP team meeting for the school year, the *parent(s) and the local educational agency may agree not to convene an IEP team meeting* for the purposes of making those changes, and instead may develop a written document to amend or modify the child’s current IEP.¹⁶⁹
 - a. If changes are made to the child’s IEP, the local educational agency shall ensure that the child’s IEP team is informed of those changes.
 - b. Upon request, a parent shall be provided with a revised copy of the IEP with the amendments incorporated.
 - c. This meeting is not a substitute for the required annual IEP meeting.

In addition, stakeholders could benefit from a more robust description of the various components of the IEP and what should be considered when developing the document. For example, the following areas could each be described with pertinent standards and linked resources for more information: the development of present levels of academic and functional performance, goals, objectives and benchmarks, assistive technology, accommodations/modifications, transition, etc. Of utmost importance are standards for determining the educational setting for the provision of special education and related services, and computing the overall time and percentage of time a student will be educated within a regular classroom. As part of this consideration would be the model of support that could be provided to a student within a regular class, e.g., co-teaching, consultation and collaboration, etc.

Of concern is the APS Continuum of Services Options Vertical Planning Chart that categorizes resource services as less than 15 hours of special education services and self-contained as being more than 15

¹⁶⁸ See VA DOE Eligibility Worksheets as an example.

http://www.doe.virginia.gov/special_ed/disabilities/sample_eligibility_forms.doc

¹⁶⁹ 34 CFR 300.324(a)(4) and (6)

hours of such services.¹⁷⁰ While this criterion may be used for other purposes, it is not one that is related to a continuum of services model; rather, it is based on an *amount* of special education services a student receives and not the *location* of services that is associated with the IDEA concept of continuum. The U.S. Department of Education monitors states, and states monitor schools districts on a continuum of services that includes three categories for students receiving special education who attend regular schools, which is based on the percentage of time a student is educated in a regular class (at least 80% or more of the time; between 79 and 40% of the time; and less than 40% of the time).

Additional comments about these educational settings and their calculation are provided below at Appendices S and T. **Modifying the Continuum to align with the U.S. Department of Education's criteria for the three regular school educational settings.**

Appendix H. Procedures & Guidelines for Reevaluations & Appendix I. Procedures for Establishing Eligibility & Delivery of Special Education Services for Transfer Students

These sections provide clear and concise procedures for these processes, including a flow chart in Appendix H. They provide a good example of what could be provided for initial evaluations and other sections pertaining to the special education process.

Appendix J. Special Education Procedures for Private School Students

A general description is provided regarding procedures relevant to students who are placed by parents in a private school. The procedures do not describe the different purposes of an IEP and a service plan and the parameters for determining the services a student may receive pursuant to a service plan. **Clarify this information to be consistent with this comment.**

Analysis of Appendix K. Comprehensive Services Act (CSA)

Information is provided regarding a interagency services available pursuant to the state's Comprehensive Services Act of 1993. **The material in this appendix could benefit from electronic links that would provide ready access to additional resources and more in depth information. Also, the information inadvertently includes reference to the Special Education Review Committee (SERC), which is discussed in Appendix L.**

Appendix L. Special Education Review Committee (SERC)

The SERC is an internal process that APS uses when there is a difference of opinion between schools or parents/guardians regarding special education. This section describes an overview, process and referral form. **If the PPIM were written as a comprehensive document, the SERC is an example of information that would be described with the first reference to a circumstance where parents and the SSC may disagree regarding recommendations for a student, i.e., decision not to refer a student for a special education evaluation. It would also be referenced thereafter as a link back to the information whenever relevant, including available procedural safeguards and the informal resolution of disagreements.**

Appendix M. Age of Eligibility for Special Education Services

This section provides a one-paragraph statement regarding the ages at which students are eligible for special education services. In a comprehensive PPIM, this information would be provided in the introductory or Child Find section. Also, although the information matches the VA Regulation, **state it more clearly and state at the beginning that students are eligible to receive special education services**

¹⁷⁰ http://www.apsva.us/cms/lib2/VA01000586/Centricity/Domain/152/vertical_planning.pdf

if they are between the ages of 2 and 21 (inclusive). Then provide the following clarifying information: the second birthday must be on or before September 30; if the 22nd birthday is after September 30, the student remains eligible for the remainder of the school year; and that the age criteria applies to students who have not graduated with a standard or advanced studies high school diploma.

Appendix N. Virginia State Assessment Program

This section provides detailed information from the VA Department of Education regarding the participation of students with disabilities in VA's accountability system, including test accommodations and participation criteria. **In a comprehensive PPIM, provide this information as part of a chapter describing the IEP content, in the section pertaining to a student's participation in VA's statewide assessments. Summarize the state's document so that pertinent points are readily identifiable (including a list of all permissible accommodations) and provide the full document and any other relevant resources through an electronic link. In addition, because this document includes information about assessment accommodations for students receiving Section 504 services; reference this information also in the Section 504 Guidelines.**

Appendix O. Your Family's Special Education Rights

The notice to parents about their procedural safeguards is provided in this appendix. In a comprehensive PPIM, **describe the procedural safeguards the first time it is relevant, i.e., when a student is referred for an evaluation, and provided as a link. Thereafter, link the document whenever it is mentioned in the text.**

Appendix P. Compensatory Services

Compensatory services may be requested if a student's IEP is not implemented within 20 school days and if services are interrupted for more than 20 school days. In a comprehensive PPIM, **include this information at the end of a chapter on the IEP process. Stress the importance of ensuring that IEP services are provided to students and the principal's accountability in this process. Given that a student's removal from school for more than 10 consecutive school days constitutes a significant change in placement and triggers various procedural safeguards, the use of a 20 school day time frame to initiate consideration of compensatory services may be reconsidered.**

Appendix Q. State Definitions

This appendix repeats the definitions that are provided in the VA Regulation that was included in the main portion of the PPIM. **Include definitions once only, and then group them as an appendix to a comprehensive PPIM. Terms could be defined that are used by APS and that are not included in the VA Regulation, e.g., SERC. In addition, have an appendix that lists all of the acronyms used in the PPIM.**

Appendix R. Matrix (Timelines)

This appendix includes a document that describes special education timelines for the 2009-2010 school year. This document provides a good summary of relevant time frames that could be referenced as a link whenever one of the various activities is referenced in the text. **Format the information to be more user friendly. Further, the detailed table provided for school year 2009-2010 to reflect various due dates based on the relevant time frame should be information that is built in the district's IEP Online (or electronic process) so that a paper reference would be unnecessary. Any information referencing specific dates for the current year need to be updated annually.**

Appendix S. Sample Letters & Appendix T. (IEP Online) Special Education Forms

Appendices S and T include many sample letters and forms. In many cases, these documents are duplicates of others that appear throughout the PPIM. In particular, Appendix T has three copies of the Prior Notice and the Meeting Notice forms. As discussed above, **provide a link to these documents when referenced in the text and then, if desired, attach in one appendix. In addition, to the extent feasible, link copies of these forms in other languages.**

One area for further consideration pertains to the IEP and the components relevant to determining placement (Services and Least Restrictive Environment). The form (page 21) does not provide for a total and percentage of time a student will be receiving services in a regular class. This information is extremely important to help school-based staff monitor placements in various educational settings by the same criteria that is used by the state and U.S. Department of Education, e.g., in regular class at least 80% or more of the time; between 79 and 40% of the time; and less than 40% of the time. **Add the percentage of time a student receives instruction in a general education class and giving notice of which of the three educational settings the percentage reflects.**

The IEP form does not consider placement continuum options that include general education classes and special classes. **Ensure that these options are included for consideration on the IEP.**

Appendix V. Intervention Assistance Team

This section provides information about the IAT process, which was discussed in greater detail above. In a comprehensive PPIM, **provide information about the IAT process at the beginning of the document. Provided this information in a streamlined manner with links to more detailed information and additional resources.**

Appendix Z. Special Transportation

Two pages are provided with comprehensive and explicit information about transportation: the first includes about half a page of general information about transportation; the second provides more detailed information about special transportation. Also included is a detailed form that describes consideration of the transportation related services needed for a student. **Combine the information on these two pages and eliminate duplicative information. In addition, include the information in the chapter on IEP content, under a section that addresses the section pertaining to transportation. Link the form, Evaluation for Special Transportation."**

Appendix BB. Procedures to Follow to Update Evaluation Components & Use Non-APS Reports

This section includes information pertaining to procedures for updating evaluation components and specifically addresses medical, psychological and the information includes the requirement that every evaluation must include a medical and psychological evaluations. **Include this information in a chapter that describes the evaluation process.**

Appendix EE. Multicultural Assessment Procedures

This section of the PPIM includes information pertaining to multicultural assessments and multicultural assessment teams. The document is dated 2007. The district has developed a very comprehensive Bridge Manual that contains detailed information pertaining to the special education process for ESOL/HILT students, including the SSC and eligibility, multicultural assessment team, and IEP considerations. **This document, dated 2008, is more recent and comprehensive than the 2007 information included in the PPIM and should be used as reference.**

Additional PPIM Areas for Consideration

The following are a few examples of additional topics that could be included in a comprehensive PPIM:

- Roles and responsibilities of various individuals involved in administrating the special education process, e.g., various central office personnel, principal, case managers, special educators, general educators, paraprofessionals, related services personnel, etc.;
- Special education caseload staffing requirements;
- Student age of majority;
- Students placed by parents in private schools because their parents do not believe they are receiving an appropriate education;
- Procedural safeguards relevant to the removal of students from school because of suspensions or expulsions;
- Informal and formal dispute resolution; and
- Confidentiality of records.

Potential Resources to Link to the PPIM

The following information on the Special Education or Pupil Support webpages provide valuable resources to summarize and link to a comprehensive PPIM, and add information for the Special Education PTA:

- **Arlington Special Education Advisory Committee and Special Education Parent Resource Center.** Offers important information to link to text related to parental involvement in the special education process, which could be in an introduction section of the PPIM.
- **Child Find.** Provides links to APS's parent brochure describing the process in English and Spanish provides a well-written and easy to follow document for the reader. (May link to relevant information describing child find in the PPIM.)
- **ADHD Services.** Provides links that describe parent resources, related web sites, articles, professional development and resources. (May link to PPIM information about ADHD that may be discussed under the disability area of other health impairments).
- **Autism Services.** Comprehensive information links resources, types of programs, and a clear description of each program. (May link to PPIM information about the area of autism.)
- **Hearing & Audiological Services.** Describes the services with links for more information. (May link to these related services.)
- **Hearing Tips and Resources.** Describes sign language and communication tips for teachers; this information may be merged with hearing and audiological services. (May link to pertinent IEP sections.)
- **Assistive Technology.** Provides a brief description of assistive technology. The site could benefit from links to other valuable and research-based information available through the Internet about this topic. (May link to relevant section in the IEP.)
- **Mandated Services.** Lists some mandated and related services in alphabetical order with brief descriptions; some areas have links to other resources. The mandated services lists the following:

audiology services, child find, discipline, extended school year services, hearing screening, hearing services, itinerant vision program, medical services, and preschool programs. Also, the following related services are briefly described: adapted physical education, occupational therapy, physical therapy, orientation and mobility services, recreation, transportation, assistive technology, speech-language services, and transition services. The related services do not address the following: audiology, counseling services, interpreter services, psychological services, social work services, health, etc.

- **Mental Health Services.** Provides a good description of services but could benefit from additional links to additional resources in the community and information about this topic. (May link to counseling and other related services.)
- **Psychological Services.** The Pupil Services website includes a description of psychological services. (May link to text related to this related service in the PPIM.)
- **Reading Services.** Describes various researched-based intervention programs available with resources listed and links to programs and frequently asked questions. The program link is very helpful, listing reading programs used in APS, a fluency chart, reading intervention chart, and a Wordstudy Parent Brochure. This brochure is a colorful, well-written guide for parents on understanding reading issues. (May link to special education services.)
- **Countywide Programs.** Lists and describes each of the countywide programs listing school location, and contact person. The information is very clear and easy to follow. (May link to relevant IEP section.)
- **Special Education Cycle.** This page describes the special education process from beginning to end in a clear and concise manner, including a very good flowchart, narrative descriptions, and other important information that seems to be designed for parents. (May link to an introductory section of the PPIM.)
- **Transition Services.** Very good information is provided about various stages of transition for students: from a hospital, to post-secondary activities, and between various grade levels. (May link various sections to relevant text in the PPIM. Note that there is a large amount of research-based information and websites available about post-secondary activities that would be useful resources for parents, students and staff.)
- **Special Education Preschool to Kindergarten.** Provides a description of the transition process, facilitators, registration procedures, developmental information, county resources and forms for teachers, and links for additional information. (May link to information related to this issue in the PPIM.)
- **Staff Lists.** Provides a special education staff directory with names, titles and assigned location; the information does not provide email addresses, which may be helpful to parents. (May link to information about special education staff in an introductory chapter of the PPIM.)
- **Glossary.** Provides an explanation of 13 basic terms; this list could be expanded and merged with VA Regulation definitions. (May link to the PPIM as an appendix.)
- **Forms.** Easy access to IEP Forms, Parents Rights in English and Spanish by clicking on a link.

Appendix BB. 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. Appendix CC lists the terms by their acronyms.

Americans with Disabilities Act (ADA). The ADA is a federal wide-ranging [civil rights](#) law that prohibits, under certain circumstances, discrimination based on disability. ADA and Section 504 of the Rehabilitation Act have the same requirements for school districts. (<http://www.ada.gov/>)

Attention Deficit Hyperactivity Disorder (ADHD) is a chronic condition that affects millions of children and often persists into adulthood. The condition can make it hard for a person to sit still, control behavior, and pay attention. These difficulties usually begin before the person is 7 years old. However, these behaviors may not be noticed until the child is older. ADHD includes some combination of problems, such as difficulty sustaining attention, hyperactivity and impulsive behavior. (<http://nichcy.org/disability/specific/adhd>)

Arlington Special Education Advisory Committee (ASEAC). The Virginia Department of Education requires each school district to have a special education advisory committee to provide advice about the unmet needs in the education of children with disabilities; assist in the development of long-range plans designed to provide needed services for children with disabilities; participate in the development of priorities and strategies for meeting the identified needs of children with disabilities; submit periodic reports to the school board; and assist the school division in interpreting educational plans to the community for meeting the needs of children with disabilities. ASEAC carries out this purpose for the Arlington Public Schools (APS). (<http://www.apsva.us/page/1290>)

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>)

Beginning of Year Math Assessment (BOY) is a progress monitoring tool currently available in the district.

Bridge Manual. A document developed by APS that contains detailed information pertaining to the special education process for ESOL/HILT students, including referral and eligibility, multicultural assessment team, and IEP considerations.

Bridge Teams ensure that all students who need ESOL/HILT and special education are properly identified and are receiving the required services. They include at least one special educator and one ESOL/HILT specialist. They are also charged with providing professional development and instructional guidance to colleagues about how to best address the learning needs of this population.

Center for Applied Linguistics (CAL) is a private nonprofit organization dedicated to the study of language and culture and to the application of research on language and culture to educational and social concerns. (www.cal.org)

Coordinated Early Intervention Services (CEIS) are defined by the Individuals with Disabilities Education Act (IDEA) as services provided to students in kindergarten through grade 12 (with a particular emphasis on students in kindergarten through grade three) who are not currently identified as needing special education or related services, but who need additional academic and behavioral supports to succeed in a general education environment. Under specified circumstances, school districts may or must spend 15% of Individuals with Disabilities Education Act (IDEA) funds for these services. (http://www2.ed.gov/policy/speced/guid/idea/ceis_pg3.html)

Classroom Assessment Scoring System (CLASS) provides an observational tool that was developed at the University of Virginia's Curry School of Education. It is based on the idea that interactions between students and teachers are the foundation of student development and learning and aims to break down the complex classroom environment in order to help educators increase the effectiveness of their interactions with all types of student learners. (www.teachstone.org/about-the-class/)

Courageous Conversations. APS administrators are engaging in "Courageous Conversations about Race," as a part of the school district's Cultural Competence work. Principals, supervisors and senior staff members are meeting monthly to talk about how individual perceptions of race impact the academic, social and emotional growth of students and the performance of staff. Cultural competence is defined as the attainment of attitudes, skills, knowledge and behaviors that enable staff and students to develop positive relationships and work effectively in cross cultural situations. PCG recommends that these discussions be expanded to incorporate issues involving individuals with disabilities. (<http://www.apsva.us/Page/2324>)

Department of Instruction for APS. Provides leadership in the development of curriculum and the implementation and evaluation of the instructional program including the required content and skills which students must learn, alignment with national and state standards and legislation, appropriate professional development, international and national studies, and local school and community input. (<http://www.apsva.us/site/Default.aspx?PageID=1094>)

Department of Student Services for APS. Provides leadership for a wide range of support services to all APS students. The department has two offices: the Office of Pupil Services and the Office of Special Education. (<http://www.apsva.us/Page/13534>)

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>)

Developmental Reading Assessment (DRA) is a progress monitoring tool currently available in the district.

Degrees of Reading Power (DRP) is a progress monitoring tool currently available in the district.

English Language Learner (ELL). Individuals learning the English language in addition to their native language.

End of Year Math Assessment (EOY). A progress monitoring tool currently available in the district.

Elementary and Secondary Education Act (ESEA). First enacted in 1965 and most recently reauthorized in 2001 as the No Child Left Behind Act. The primary federal law that impacts K-12 public education. The Act emphasizes systematic, comprehensive educational reform through improving academic accountability, as well as curriculum, resources, and teacher quality. All students are expected to be proficient in core subjects by 2014. (<http://www2.ed.gov/policy/elsec/leg/esea02/index.html>)

English for Speakers of Other Languages/High Intensity Language Training (ESOL/HILT). The ESOL/HILT office collaborates with APS staff to guide, support and monitor instruction that develops academic language and content knowledge to accelerate student progress. The ESOL/HILT Office also collaborates with APS staff to build effective parental and community involvement that promotes student achievement. (<http://www.apsva.us/esolhilt>)

Experience-Based Career Education (EBCE) provides students with a combination of academic preparation and unpaid career explorations at work sites in the community. EBCE is open to students with an IEP who are in their last year or two of high school, can function independently at community work sites, and who are able to take public transportation independently after minimal training. (<http://www.apsva.us/site/Default.aspx?PageID=8775>)

Free Appropriate Public Education (FAPE). Both Section 504 of the Rehabilitation Act and the Individuals with Disabilities Education Act (IDEA) require school districts to provide FAPE to students identified as having a disability. Section 504 covers students with disabilities who receive special education and/or supplementary aids and services, including related services. IDEA excludes students with disabilities who do not need special education services and only need supplementary aids and services, including related services. (<http://www2.ed.gov/about/offices/list/ocr/docs/edlite-FAPE504.html>); and <http://www2.ed.gov/about/offices/list/osers/osep/index.html>)

Family Educational Rights and Privacy Act (FERPA). Federal legislation that protects the privacy of students' personally identifiable information. The law applies to all schools receiving funds from the U.S. Department of Education. (<http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>)

Functional Life Skills is a countywide program designed for students with significant cognitive impairments coexisting with significant deficits in adaptive behaviors. The program includes a focus on functional daily living skills and communication.

Intervention Assistance Teams (IAT). The IAT is an informal collaborative process that is designed to help promote students' success in the regular education classroom. Intervention strategies such as alternative or modified learning instruction and/or behavior management techniques may be developed to: improve the student's academic performance, improve the student's behavior, or improve and refine teaching skills so that the classroom teacher is able to teach students with diverse educational needs. (<http://www.apsva.us/page/1979>)

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/>)

Individual Education Plan (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>)

Interlude is a countywide program for students struggling with emotional and behavioral challenges. It provides academic, clinical, therapeutic, interagency and family resources. Staff members are highly trained; and each class has a teacher, resource assistant, and therapist. (<http://www.apsva.us/Page/2870>)

Local Education Agency (LEA) includes school districts such as the Arlington Public Schools.

Limited English Proficiency (LEP) is a term used to describe a student who is limited in English proficiency and who has not mastered English in the four domains: reading, writing, listening, and speaking. Another term often used to describe Limited English Proficient is ELL, English Language Learners. (<http://www.education.com/definition/lep-limited-english-proficient/>)

Least Restrictive Environment (LRE) is a core principle of Section 504 and IDEA that requires to the maximum extent appropriate, students with are educated with those who are not disabled, and special classes, separate schooling, or other removal from the regular educational environment occurs only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.

Making Action Plans (MAPS) is a planning process used by teams to help students plan for their futures. It is directed and guided by the student and family and is facilitated by the team members. The MAPS process is based on student need and student participation which is at the core of the IDEA mandate for transition planning for students, beginning at age 14. The MAPS process provides a structured format that helps with the task of gathering information for a transition plan that is an integral part of the IEP. (<http://www.wiu.k12.pa.us/cms/lib6/PA14000132/Centricity/Domain/12/MAPS.pdf>)

Medicaid. Enacted in 1965 through amendments to the Social Security Act, Medicaid is a health and long-term care coverage program that is jointly financed by states and the federal government. Each state establishes and administers its own Medicaid program and determines the type, amount, duration, and scope of services covered within broad federal guidelines. States must cover certain mandatory benefits and may choose to provide other optional benefits. (<http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-State/virginia.html>)

Multi-Intervention Program for Students with Autism Spectrum Disorder (MIP-A) is a countywide program designed to meet the needs of students with Autism Spectrum Disorders, the program focuses on communication, social skills, academics, and independent life skills.

Minority Student Achievement Network (MSAN) is a national coalition of school districts that have come together to study achievement gaps that exist in their districts between students of color and

their white peers. APS is not a part of the MSAN but MSAN data was used in comparison with APS data. (<http://msan.wceruw.org/>)

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*](#))

No Child Left Behind Act of 2001 (NCLB) aims to bring all students up to the proficient level on state tests by the 2013-2014 school year, and to hold states and schools more accountable for results. NCLB requires all districts and schools receiving Title I funds to meet state "adequate yearly progress" (AYP) goals for their total student populations and for specified demographic subgroups, including major ethnic/racial groups, economically disadvantaged students, limited English proficient (LEP) students, and students with disabilities. (<http://www.greatschools.org/definitions/nclb/nclb.html>)

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 Pupil Services is one of the two offices within APS's Department of Student Services. The Office provides system wide services in school psychology, social work and counseling. (<http://www.apsva.us/site/Default.aspx?PageID=2761>)

Office of Special Education is one of the two offices within APS's Department of Student Services. The Office provides support for students with disabilities, parents, principals, and school staff in the evaluation, identification, placement, instruction, and transitional services. (<http://www.apsva.us/site/Default.aspx?PageID=2865>)

Phonological Awareness Literacy Screening (PALS) is a progress monitoring tool currently available in the district. (<http://pals.virginia.edu/>)

Special Education Policy and Procedures Implementation Manual (PPIM). APS's PPIM, begins with a copy of the state's special education regulation and is followed by 28 appendices.

Parent Resource Center (PRC). APS's PRC is a resource and information center for families, staff and community members with programs and activities designed to provide support to families. The PRC has a great deal of materials geared toward families of children with special needs, yet also has many resources for families seeking information on general parenting topics as well. (<http://www.apsva.us/Page/2882>)

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. (<http://www.rti4success.org>)

Secondary School Program for Children with Asperger's. This middle and high school program is designed to supplement the general education curriculum. Students are provided specific instruction in development of social skills, organizational skills, and a challenging academic experience.

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. (<http://www2.ed.gov/about/offices/list/ocr/docs/edlite-FAPE504.html>)

Special Education Parent Teacher Association (SEPTA). APS's SEPTA is a county-wide PTA organized for the specific purpose of providing information and support to families of children with special needs. (<http://www.arlingtonccpta.org/web-links/arlington-public-school-resources.html>)

Sheltered English Instruction Observation Protocol (SIOP) is a research-based and validated instructional model that has proven effective in addressing the academic needs of English learners throughout the United States. (<http://www.cal.org/siop/about/index.html>)

Standards of Learning (SOL) describe the Commonwealth's expectations for student learning and achievement in grades K-12 in English, mathematics, science, history/social science, technology, the fine arts, foreign language, health and physical education, and driver education. (http://www.doe.virginia.gov/testing/sol/standards_docs/index.shtml)

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. (http://www.doe.virginia.gov/special_ed/reports_plans_stats/index.shtml)

Student Study Committee (SCC). Each school's SCC assesses the problems and needs of any student referred by APS personnel, parents/guardian/surrogate parents, or others. Within 10 working days of the referral, the SSC may recommend either continued use or modification of regular education resources or refer the child for consideration for eligibility for special education and related services.

School Test Coordinators (STCs) are responsible for ensuring that students with IEPs receive appropriate accommodations on state tests.

Supported Work and Transition Program (SWAT) is open to students in their last few years of high school who are in need of support to explore career options and learn to use public transportation. SWAT offers students a combination of functional, community-based academic skills and unpaid career exploration experiences in the community. (<http://www.apsva.us/site/Default.aspx?PageID=8777>)

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. (<http://www.greatschools.org/definitions/nclb/nclb.html>)

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. (http://www.doe.virginia.gov/special_ed/transition_svcs/index.shtml)

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 prevention model, universal screening occurs for all students to help identify those who are at risk for learning difficulties. (www.rtinetwork.org)

Virginia Commonwealth University's Autism Center for Excellence (VCU-ACE). VCU-ACE is a university-based technical assistance, professional development, and educational research center for Autism Spectrum Disorders in the Commonwealth of Virginia. (<http://www.vcuautismcenter.org/>)

Washington Area Boards of Education (WABE) previously known as the Metropolitan Area Boards of Education, was first established in 1971 as a means for area school divisions to share information, study common problems, and enhance cooperation among educational organizations. Each year, the group surveys its members to publish the annual WABE Guide. This guide enables local school systems to learn about each other by reporting comparable information in a standardized format. In addition, the WABE Guide is meant to be used by citizens as a source for consistent, reliable educational data. (<http://www.fcps.edu/fs/budget/wabe/>)

Appendix CC. Acronyms

ADA	Americans With Disabilities Act
ADHD	Attention Deficit Hyperactivity Disorder
APS	Arlington Public Schools
ASD	Autism Spectrum Disorder
ARRA	American Recovery and Reinvestment Act
ASEAC	Arlington Special Education Advisory Committee
AT	Assistive Technology
BOY	Beginning of the Year Math Assessment
CAL	Center for Applied Linguistics
CEIS	Coordinated Early Intervention Services
CPI	Crisis Prevention Intervention
CLASS	Classroom Assessment Scoring System
DD	Developmental Delay (disability)
DRA	Developmental Reading Assessments
DRP	Degrees of Reading Power (progress monitoring tool)
EBCE	Experience-Based Career Education
ED	Emotional Disability
ELA	English Language Arts
ELL	English Language Learner
EOY	End of Year Math Assessment
ESEA	Elementary and Secondary Education Act
ESOL/HILT	English for Speakers of Other Languages/High Intensity Language Training
FAPE	Free Appropriate Public Education
FERPA	Family Educational Rights and Privacy Act
IAT	Intervention Assistance Teams
ID	Intellectual Disability

IDEA	Individuals with Disabilities Education Act
IEP	Individualized Education Program
LEA	Local Education Agency
LEP	Limited English Proficiency
LRE	Least Restrictive Environment
MAPS	Making Action Plans
MIP-A	Multi-Intervention Program for Students with Autism Spectrum Disorder (MIP-A)
MSAN	Minority Student Achievement Network
MTSS	Multi-Tiered System of Supports
NCLB	No Child Left Behind Act of 2001
OCR	Office for Civil Rights
OHI	Other Health Impairment (disability)
PALS	Phonological Awareness Literacy Screening
PD	Professional Development
PPIM	APS's Special Education Policy and Procedures Implementation Manual
PRC	Parent Resource Center
PCG	Public Consulting Group
Rtl	Response to Intervention
Section 504	Section 504 of the Rehabilitation Act
SEPTA	Arlington Special Education Parent Teacher Association
SIOP	Sheltered English Instruction Observation Protocol
SIS	Student Information System
S/L	Speech/language Impairment disability
SLD	Specific Learning Disability
SOL	Virginia Standards of Learning
SOPM	Standard Operating Procedures Manual
SPP	State Performance Plan

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SCC	Student Study Committee
STC	School Test Coordinators
SWAT	Supported Work and Transition Program
UDL	Universal Design for Learning
VCU-ACE	Virginia Commonwealth University's Autism Center for Excellence
WABE	Washington Area Boards of Education